

20 August 2012

Mr Zachary Powell
Game Victoria
Department of Primary Industries
1 Spring Street
Melbourne Vic 3000

Dear Zachary,

DRAFT WILDLIFE (GAME) REGULATIONS 2012

The Victorian Farmers Federation (VFF) welcomes the opportunity to submit on the draft Wildlife (Game) Regulations 2012.

The VFF would like to raise a number of issues with the Wildlife (Game) Regulations 2001 that have not been adequately addressed in the proposed replacement regulations. The key issues from our perspective are the impact of:

- deer on private land productivity and conservation works
- licensing/permitting requirements and limitations on private landholder control of deer
- poor deer hunting practices on wild dog populations

Impact of deer on private landholders and barriers to control

Deer can impose substantial costs on private landholders, including consuming pastures, damaging fencing, and damaging private land under conservation management. It is critical that private landholders are able to take practical measures to remove deer from private property and there are no unnecessary barriers to these measures.

The current licensing requirements – either a hunting license or an Authority to Control Wildlife permit – represent a substantial barrier to the control of deer on private land. Seasonal limitations on hunting on private property in the past, and the exclusion of some private land from deer hunting also represented barriers.

The VFF welcomes the removal of restrictions placed on the hunting of deer on private land that are included in the draft regulations. We support a year-long open season for all deer (except Hog deer) on private land and the clarification that deer can be hunted on private land within Prohibited Deer Hunting Areas.

To further remove barriers to the control of deer on private land the VFF would also like to see the waiving of licensing requirements for deer hunting on private property by the owner or occupier of the property. This could be achieved by either removing deer from the protected species list under the Wildlife Act and/or by waiving the requirement to have a hunting license.

Recommendation 1: The requirement for a Game License for hunting should be waived on private land for the owner/occupier of that private land, provided they have the appropriate firearms license; and/or

Deer be removed as a protected species under the Wildlife Act 1975, such that they can be controlled on private land without the need for an Authority to Control Wildlife permit.

Impact of poor hunting practices on wild dog populations

While hunters are entitled to shoot deer, and the VFF supports the hunting of deer on both public and private land, there is potential for adverse side-effects from poor hunting practices. In particular the VFF is concerned at the potential for deer carcasses on public land to provide a food source for wild dogs. Given the substantial cost imposed by wild dogs on agricultural production (recently estimated at \$18m per annum in Victoria) we believe it the regulations should create an obligation of hunters to responsibly dispose of the remains of deer. The Department of Primary Industries website provides guidance on this matter:

"Disposal of deer remains

To protect the environment and reputation of hunters, deer hunters should be considerate of how and where they dispose of deer remains. Dispose of all deer remains responsibly (through burial if possible) and no less than 100 metres (300 feet) from waterways. Remains, including entrails, should never be disposed of or left in rivers or other bodies of water. The improper disposal of deer remains can pollute waterways, contribute to sustaining wild dogs and foxes, and portray a negative image of hunters and hunting. Look after your recreation and do the right thing."

The VFF believes this issue could be better addressed by including a requirement in the Wildlife (Game) Regulations.

Recommendation 3: Include a regulation on the disposal of deer remains. Deer hunters must make every reasonable effort to responsibly dispose of deer remains, including through burial or the complete removal of the carcass.

If you wish to discuss any issues raised in this submission further, please contact the VFF's Land Management Policy Adviser, Jacob McElwee, on 03 9207 5552, or at jmcelwee@vff.org.au.

Yours Sincerely



Gerald Leach
Land Management Committee Chair