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This response from the Friends of the Gippsland Lakes Parks and Reserves (FOGL), because of our area of interest, focuses on locations such as the Lakes National Park and the Gippsland Lakes Coastal Park. There are issues, particularly where unfenced boundaries on public and private land allow deer to roam free, which create unique management concerns. However, many of our comments should be applicable to the overall management of Hog Deer.

In the last four years, FOGL has been involved in many activities and projects to upgrade the amenity of the east section of the Coastal Park (Boole Poole) and encourage wider use. This has included reopening the walking track along the north side of Bunga Arm (now known as Leune Beeuke track). We have worked cooperatively with Parks Victoria to gain funding and have a new Interpretive sign erected at the Silver Shot entrance to the park. There have been field trips and wetland walks organised. A major initiative is project, Burragarra, ("the returning") which aims to re-establish indigenous flora & fauna. As part of this we gained a \$15,000 Envirofund grant for a program to eradicate wild pigs and we are involved in other initiatives to further extend Burragarra

A. Ecology and conservation of Hog Deer

Is all the information correct? No

Is there anything you can add? Please quote the source.

Over the past 10 years where feed has been limited by drought deer have fed from almost all forms of native vegetation. Source – personal Observation.

B. The Strategy (pages 10-17)

Do you see the strategy assisting in planning for public and private land?

There is an admission that management to date has been limited and ineffective. This strategy could assist in planning as far as it goes in some areas. However, without resourcing for implementation, enforcement and evaluation the new strategy will also fail. There is little consideration of other landholders and the general public who are also stakeholders with rights to utilise their own and public land affected by the provisions made for deer management. There is no documented evidence to prove that hog deer have not had a negative impact on native flora & fauna

The table below may be a useful guide for your comments and thoughts on the objectives.

Objectives (see pages 10-16)	Do you agree? (include any supporting information if you disagree)	Were there any gaps in information?	Do the strategic actions match the objective?	Is the responsible agency correctly identified?
<p>1. Management of Hog Deer</p> <p><i>Objective: Maintain ecologically sustainable Hog Deer populations in Victoria</i></p>	<p>No</p> <p>The draft refers to maintaining an ecologically sustainable population, while minimising any impacts on natural values. As no study has been undertaken to determine actual impacts then how can decision making occur in relation to biodiversity conservation. (Parks Management Plan Strategies encourage investigation of the effect of Hog Deer on native flora and fauna but has not happened).</p>	<p>A more accurate means to ascertain numbers is needed as the ranges in the size of populations shown in Figure 2 appears very broad. In total it would appear there could be any where between 1350 and 2130 hog deer across the populations identified.</p> <p>Until there is documented evidence to prove that hog deer have not had a negative impact on native flora & fauna then there is no benchmark for the number of deer appropriate to any area.</p>	<p>Depending on the defined impact of deer, management objectives will need to be reviewed</p>	
<p>2. Sustainable, quality hunting opportunities</p> <p><i>Objective: Ensure that management strategies provide for the sustainable annual harvest determined by the priorities of individual site plans.</i></p>	<p>No</p> <p>A major issue not covered by the terms of reference or the draft plan is the cost of implementation. It is admitted in the draft plan that the limited forms of management already in place do not work. How will the management strategies in the draft plan be achieved without resources to implement, supervise and evaluate?</p>	<p>A strategy is urgently required to address the situation where populations of hog deer are totally out of balance (male to female) and numbers are increasing. The strategy needs to include measures which would have to be taken in the short term to address this. While local individual site plans will be based on this overall strategy delays could lead to irreversible damage from the ever expanding population of hinds.</p>	<p>Depending on the defined impact of deer management objectives will need to be reviewed</p>	
<p>Sustainable, quality hunting opportunities</p> <p><i>Objective: Promote and provide for diverse, quality recreational opportunities and experiences on public and, where possible, private land.</i></p>	<p>No</p> <p>The bias towards stag harvesting that has occurred has lead to a disproportionate number of hinds occurring. (DSE 2007 quoted ratio of hinds to stags was 6:1) and given the harvesting practices must continue to widen</p>	<p>Being realistic can area specific management overcome this on public/private land eg Boole Poole where hunters are either balloted in the park or private land holders.</p>		

<p>3. Minimise impacts and enhance biodiversity values where Hog Deer occur</p> <p><i>Objective: Minimise impacts and enhance biodiversity values where Hog Deer occur.</i></p>	<p>No</p> <p>How does the government justify introduced species in the light of its policy to preserve and enhance biodiversity?</p> <p>Has any scientific research been undertaken to prove that hog deer are not a threat to any species.</p> <p>Plants expected to be present in the Ecological Vegetation Classes described in the Coastal Park are not apparent</p> <p>It would appear that managers of public land do disagree with the assertion that the hog deer have no detrimental effect on the flora & fauna. In the past, draft plans drawn up by Parks and Catchment Management Authority have expressed this view only to find the reference withdrawn in the final document.(see Lakes National Park and Gippsland Coastal Park draft 1996 p14)</p> <p>presumably because the protected species status is maintained without challenge</p>	<p>Local management plans need to consider the biodiversity specific to that area and not be based on generalisations.</p> <p>Without evidence to the contrary any planned "regeneration burn" is likely to produce revived species which will be vulnerable to browsing by deer and defeat the purpose of the burn. By the same reasoning a wildfire could have an even more devastating impact.</p> <p>See also attachment which describes observations based on local knowledge much of which is directly applicable to the Coastal Park</p>		
<p>4. Private land</p> <p><i>Objective: Encourage partnerships between landowners and hunters to provide for quality Hog Deer hunting on private property, economic incentives for wildlife conservation, assistance with reducing impacts of Hog Deer on agriculture and improved relationships between landowners and hunters.</i></p>	<p>No</p> <p>The way in which this part of the plan is described it makes the property based game management sound very attractive to the benefit of landholders and hunters. Strict guidelines, effective supervision, monitoring and enforcement would need to be prescribed to ensure that hog deer management on private land was contained and real conservation outcomes resulted. There is a potential danger that expansion in total numbers would occur without any environmental gains and no offset elsewhere to meet the management objectives</p>	<p>A distinction needs to be made between permanent residents and unoccupied or holiday homes which border public land. This applies particularly in areas where all the public land (eg Coastal Park) and private land is unfenced. Absentee owners who hold these properties primarily for deer shooting do nothing to contribute to the welfare of deer, have no consideration for permanent residents' use of the land or contribute to habitat regeneration</p> <p>The rights to amenity for non-hunting landholders is affected because they are forced to incur costs to exclude invasive deer (or where deer have access they are "maintained" free of charge for the benefit of hunters on other properties in the area.</p>		

Draft Hog Deer Management Strategy 2008

		This is grossly inequitable when owners charge large sums for visitors to shoot deer)		
5. Partnerships <i>Objective: Foster and strengthen relationships between hunters, public and private land managers and the broader community for mutually beneficial outcomes.</i>	No The Strategy claims it will foster increasing understanding of the benefits of Hog Deer management and will gain broader community support. Conservation groups and other users of public land already hold contrary views on biodiversity and sustainability so clear evidence of the viability of this strategy would need to be part of any education program.	There is a need to take seriously the other non hunting stakeholders. An extreme example is a hunters' allotment which is landlocked within the Gippsland Lakes Coastal Park. It is encompassed by a biosite to protect the endangered Sea Eagle and has the main park access track running through it. Users of the coastal park unwittingly use this track during the deer shooting season. The ballot which takes place in the park also restricts the public use of the park during a popular period of the year.		

Any other comments:

Attachment **Native Plants - Indigenous to Boole Poole Only**

Observed Behaviour of Hog Deer on Private Property at Pt Tyers & Jubilee Head

Detrimental Actions	Common Outcome	
Grazed to Ground	Survived, stunted, seed loss	S
Grazed	Fatal	F
Grazed	Trimmed only	T
Rutted	Major destruction	M
Rubbed	Ring barked, diseased	R

Botanical Name	Common Name	Comment
Acacia longifolia	Sallow Wattle	M,T
Acacia melanoxylon	Blackwood	S, B
Acacia mearnsii	Black Wattle	S
Banksia integrifolia	Coast Banksia	S,T
Banksia serrata	Saw Banksia	S, B
Bursaria spinosa	Sweet Bursaria	S, R
Casuarina stricta	Drooping Sheoke	F
Hymenanthera dentata	Tree Violet	M

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Indigofera australis	Austral Indigo	F,
Melaleuca	Paperbark	M
Myoporum ins ulare	Common Boobialla	S,M
Pittosporum Undulatum	Sweet Pittostrum	F
Pomaderris aspera – Rhamnaceae	Hazel Pomaderis	S,R
Rhagodia candolleana sp.candolleana	Seaberry Saltbush	T
Solanum aviculare	Kangaroo Apple	F
Stypandra glauca - Liliaceae	Nodding Blue Lily	F
Wahlenbergia stricta	Tall Bluebell	T,F
Orchids & Lilies		
Diapodium -	Pink Hyacinth	S
Caledenia	Pink Fairies Aprons	S
	White Fairies Aprons	S
	Donkey Orchids	F
	Green Hoods	S
	Bulbine Lilies	S
	Blue Flax Lily	S
	Blue Fringed Lily	S

Notes

- Plants shown grow naturally including some that have been re-established on Boole Poole.
- Other plants which are also grazed by deer not included are
 - Native plants not indigenous to the area.
 - Any exotic species including domestic fruit & vegetables
- Plants which are continually grazed or rubbed do not flower as well and are more prone to disease and drought
- Plants destroyed unless fully fenced or provided with robust wire netted tree guards
- Hog deer and kangaroos are the only grazing animals in significant numbers
- Kangaroos have not been observed feeding on anything other than native grass and kikuyu.
- Kangaroos only contribution to plant loss occurs through damage to fencing and tree guards thus providing access for deer

Submissions close on 17 December 2008.