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The Chairman,
Mr Ian Rickuss MP
Agriculture, Resources and Environment Committee
Parliament House
George Street, Brisbane Q 4000

29th December 2013

Submission to the AREC re the Biosecurity Bill 2013

To the committee.

I would like to offer you the benefit of the experience and knowledge gained through full-time involvement with wild deer capture, farming and hunting in Australia and overseas, as well as that which has been gained over 10 generations of my family on the land in this country raising cattle. This includes the feral animal control work required on large and small holdings plus the experience gained through the establishment of guided hunting industries over a combined 70 years by myself, my parents and grandparents.

This has included trapping, farming, guiding, live export, aerial and ground control work, market development and research on many of this country's introduced feral species. It has required the development of best practice procedures and the involvement on various industry and Governmental boards and committees.

I would like to now comment on the proposed Biosecurity Bill 2013, detailing how I feel it will affect my personal business and those of my family, friends and associates. I will try and identify what I feel are short-comings of this Bill and offer possible solutions to these issues.

Overview of the Biosecurity Bill

My impression from the proposed Biosecurity Bill is that it intends to ensure compliance from everyone and the vast list of fines and penalties within will be used to actively enforce the yet-to-be-written regulations in an attempt to try and reach that goal.

This Bill appears to recognise the individualistic qualities of the Australian country people and aims at controlling them with threats, surveillance and inspections backed up by jail terms. If this underlying philosophy is maintained, it can only create division between the people of the land and Government, which will lead to the failure of what I feel, is the necessary intent of this legislation, i.e: the protection of this country's resources.

I find this Bill personally quite objectionable in many ways. It has been presented in current form due to the fact that "the length and expense of conducting a new review or drafting a new Bill," (Ashurst, Trade and Transport Alert 2nd Dec 2013) meant it was preferable to present second-hand policy rather than wait and get it right.

The reason the LNP was swept to power in a landslide was due largely to unpalatable policies both implemented and proposed by the former Government. This policy was no exception, in fact quite likely one of the leaders in invoking voter disquiet. For the now incumbent Government to propose it without significant changes, is a slap in the face for so many voters who were incensed by the original deeply flawed ALP policy.

This Bill deserves to be done correctly, not simply conveniently. If additional cost is necessary then so be it as good policy is worthy of sufficient initial outlay. I would recommend that the commitment to a far more cooperative and harmonious approach is clearly included in the *Biosecurity Bill 2013* to ensure that the support and compliance necessary is received from the community in a voluntary manner.

A “One Plan” System.

Some years ago Frank Keenan from Biosecurity Queensland and I discussed the concept of a “One Plan” system for farm management. This was a holistic approach to the complex problem of managing the myriad of issues facing landholders and their associated suppliers, transporters, contractors, hunters and visitors.

This concept is what I would call a **Property Based Management Plan** (PBMP), something my business has been developing for over 20 years in conjunction with the Research into Deer Genetics and Environment group (RIDGE). This plan would in itself be a voluntary alternative for landholders but if accepted by them, would open opportunities and free up their resources.

A PBMP would cover at least the following topics:

- Water utilisation - storage, quality, creek and stream conservation etc.
- Soil utilisation - erosion control, quality and maintenance.
- Chemical usage- storage and recording.
- Stock management - transport, recording, welfare and stocking rates.
- Vegetation management – regrowth control, sensitive area protection etc.
- Native plant and animal welfare – predator control, habitat retention etc.
- Pest management - weeds, animals, insects, pathogens.
- Fire control - rotational burning, permitting etc.
- Occupational Health and Safety - training, recording etc.

Each topic would have the ability to split into as many sub-sections as required to cover the issues related to the individual property or group of properties. Landholders accepting the system would be able to access and share information online with Government staff, thus reducing the need for on-ground inspections to address compliance issues.

A pro-forma for such a system could be presented in electronic form so that it was available via such mediums as Iphone, Ipad and computer as an online interactive system. Landholders embracing such a system would have access to the latest information and techniques available to assist them with better managing this country's resources.

Under a PBMP, each section could be immediately linked back to the plan, even while a landholder is still in the field. For example, if a landholder was making a decision on an issue related to land clearing, it would have associated judgements required regarding erosion control, pest weed infestations, chemical usage, animal welfare and OHS.

Very seldom is it possible to make an entire judgement on the land without it having associated and often more complicated, associated judgements. By having all topics under the one system, it would give landholders and contractors/workers etc, the chance to make better informed and more ecologically sustainable decisions.

Pest Control

One of the suggested topics under a PBMP would be the control of all species and things regarded as “Pests”. One of the best ways to manage some “Pests” is to stop regarding them as a Pest and start managing them as a resource. While it is true that some pest species would be undesirable, difficult or impossible to utilise in any known way, it is true that many of our well established farm species could become a pest overnight. Whether a species is a pest or an asset depends on if they are an economic burden or benefit. To highlight this fact, we need to use the example scenario which would face the cattle industry after a major crisis.

If all of this country’s markets for cattle suddenly were taken away due to i.e: the outbreak of a serious infectious disease, we would soon have the problem of vast herds of unwanted cattle causing environmental issues across all areas of the country. With landholders and associated businesses bankrupted and broken, there would be no ability or incentive to manage, muster, brand or treat cattle and very soon they would be a “Pest” species on an enormous scale.

Industry has controlled and will control introduced species in the future, far better on a voluntary basis than if threats or intimidation are used, as long as there is a value for landholders in that resource. The ability for industry to obtain a return from species regarded as pests is a vital component of any successful PBMP.

Wild Deer. Pest or Resource?

Wild deer are one such resource that is now seen by some as a “pest” simply due to a drop in their perceived value. To understand why and how this happened, I will supply the following information.

Wild deer were introduced to this country from the early 1800's with the full permission of the Governments of the time and have been regarded as “Introduced Fauna” “Game” or “Stock” under various Acts until recently, when pressure from the ALP Governments of the time, reduced its status in some States to that of a “Pest”.

The regal red stag has been held in such high regard that it was placed on the Coat of Arms of Queensland. One of the first actions of the Campbell Newman led Queensland Government was to reinstate the red stag and brolga to their rightful place on our Coat of Arms, a symbolic and historic gesture depicting the unity of both European and Indigenous cultures.

Deer Farming

Deer farming has had a troubled start but existing and emerging opportunities give positive indication for the future. This industry was progressing into a vibrant and quite viable rural industry during the early 90's but unfortunately met with demise due to a number of reasons.

1. A collapse in the Asian economy resulting in a sharp drop in export orders for Australian venison.
2. The collapse of communism in Russia resulting in unprecedented pressure on Eastern bloc deer herds and huge competition for deer velvet antler markets.
3. Sharp drops in the price of deer velvet in NZ which led to huge numbers of deer being slaughtered; also resulting in unfair competition with Australia for domestic venison markets.
4. The resulting total collapse of both domestic and export markets for Australian venison and velvet due to these external influences.

5. The worst drought conditions in recorded history across most deer farming areas of Australia for a period of over 10 years.
6. No Government assistance or support towards alternative market development for the deer farming industry from levies previously paid to the Rural Industries Research and Development Committee (RIRDC)

Deer Farming Today.

The restaurant and retail markets for venison are now at an all-time high with the supply coming almost entirely from New Zealand and some southern growers.

Deer velvet antler prices have grown steadily to approximately 75% of pre-crash prices. Extensive testing and product development has shown it has a place in modern society as a health supplement.

Deer farming in Australia has the potential to develop again into a strong domestic and export industry due to historically high numbers of wild deer in each State and established and growing markets for product.

Deer Farm Costs.

Excessive regulation will result in the industry losing the chance to again become viable. Standard fencing methods are expensive (\$20,000 per km minimum) and when added to establishment or refurbishing of yards and handling facilities, transport vehicles, market development and staff training, unnecessary red-tape will severely compromise the re-establishment of this rural industry.

Control of deer through shooting vs trapping and farming.

Shooting and trapping of deer can be wasteful and ineffective if not done correctly. Many of the techniques used by local authorities to trap or shoot wild deer are outdated, poorly designed or ineffective due to the burden of red-tape and regulations imposed upon operators. Humane and effective trapping methods are available from within the deer farming fraternity.

Shooting as a control method.

When deer are subjected to extensive shooting operations, the surviving population is forced and repelled back into the most inaccessible country nearby (often National Park or Forestry areas) and become either partially or totally nocturnal. These densely vegetated and difficult to access areas will provide sanctuary for remnant populations, making eradication efforts impossible or exorbitantly expensive.

Some areas are not suitable at all to recreational shooting due to the close proximity of houses but can be possible if the shooting is carried out by highly trained professionals. It has been suggested that the use of shooters with bow and arrows be used in this situation and while bow-hunting can be a very humane and effective method to be included wherever possible, it should be avoided in urban areas as a struck animal may move very quickly into the public's view before expiring and a visible protruding arrow may be highly upsetting to by-standers.

Shooting is more effective because head shots can be used to instantly drop an animal. There are concerns about noise and stray bullets which can be somewhat managed by low velocity or reduced power ammunition. Noise attenuators or silencers are legal in New Zealand but are totally illegal for any class of licence under the Queensland Weapons Act. The concern regarding stray bullets can be managed by using proper planning and by selecting tactical projectiles as used by police in urban environments.

Game Meat Harvesting

Herd quality and the inherent value to the associated recreational hunting and professional guiding industry are reduced rapidly if the herd is culled by professional game harvesters who only select the larger and more profitable animals. This has been well documented for buffalo, kangaroo, pig and goat harvesting operations. From personal observations, many landholders have seen no noticeable reduction in overall feral numbers, only in the larger weight and age brackets within each herd, a

response known as “Density Dependent Compensation”. (Management of Harvested Wildlife Populations, Riffell.S.K and White.D, 2009)

It is very difficult, expensive and impractical to try for total eradication in all but a few cases. Many landholders have well established control programs in place already which focus on keeping a well regulated herd of quality animals. This can be achieved at a low or neutral cost basis to the landholder by the inclusion of volunteer and/or fee paying recreational hunters. Unless ongoing control operations are desired by landholders and continued relentlessly, the numbers of animals will increase due to the lack of sustained population control.

One example of this cooperative style of management is the system used by the Department of Conservation in New Zealand to control introduced species such as Tahr and Wapiti in Conservation areas and National Parks. Recreational hunters are welcomed into Conservation areas during a balloted hunting period which concentrates on the harvesting of mature “Bull” tahr or wapiti and some females/hybrid animals. The funds raised during this period helps to continue female and hybrid culling operations later in the year in conjunction with recreational hunters. The outcome is a strong tourism industry, reduced feral populations and the protection of the environment.

Total Eradication

If it becomes perceived that the aim of Government is to effectively eradicate wild deer, there will be a considerable negative back-lash from those within the community who hold strong values for species such as wild deer. Although I do not condone the spread of any introduced species, history has proven that there will be vigilant protection of hunt-able populations of species such as deer and far more incidents of isolated new releases into the thickest and most remote areas of the country.

Younger age deer can and will be moved easily to new areas and even with an intensive and sustained inspection regime similar to the Papaya Fruit Fly inspection strategy; there is little hope of controlling new releases of deer. By enlisting the

voluntary support of industry through a cooperative approach which recognises recreational hunting and the historic deer areas, it will reduce the desire to establish new populations and will bring about positive outcomes.

Trapping as a control method.

Trapping can be an effective control method but is expensive and requires high level of expertise. A common error is to use inappropriate small traps. Traps for larger, more flighty herbivore prey species such as horses and deer are very different to traps for smaller carnivores and scavengers such as pigs, wild dogs and cats

The objectives of trapping are to capture and remove animals from an area where they are not desirable. Trapped animals are either used for meat and other products or as establishment animals for farming purpose. Trapping can be used in both rural and peri-urban settings.

Trapping of deer, using trap designs perfected by industry from the 70's onwards, can provide far more effective control of deer than eradication shooting methods. To trap deer successfully it is best to do so in a quiet and unobtrusive manner; to lure them out of thick bush country with a food source which is attractive to them.

The techniques used were so successful, that during the period between 1977 and 1996 when wild deer were classified as "Introduced Fauna" under the Nature Conservation Act 1952, Government saw the need to impose restrictions on trapping so that the deer herds were not reduced to what was regarded as an "unviable" level.

Trapping is complimentary to hunting ventures as it predominantly targets excess females within a herd as they are the quietest to handle and less likely to stress, leaving recreational hunters to target larger "trophy" males within the herd. If trapping is done correctly, it reduces animal numbers in Forestry and National Park (NP) areas adjacent to freehold land, brings forward cooperation with landholders and hunters and produces a quality product/farm animal.

Impediments to Deer Farming within the Biosecurity Bill

The main source of deer for farming is traditionally from trapped feral deer and these points need to be taken into consideration:

- Trapping deer is a very expensive exercise. Fences for trapping have to be of a high grade and design, especially if the trap is under 1 hectare in size.
- It requires considerable expertise and time to correctly and humanely trap deer.
- Trapping can be cost effective if there is a high enough final value placed on each animal.
- Trapping will not be economically viable unless the operator has the ability to use the animal trapped for farming purposes.

Once an animal has been trapped and relocated to a deer farm, there must be the minimum of restrictions on these farmers if they are to remain competitive with other states of Australia or other countries.

Part of the regulations which will make up the Biosecurity Bill is the Feral Deer Strategy 2010-15. Within these documents there are references to “Deer Proof Fence” (DPF) and “Escape proof Enclosures” (ESE) being required for all deer farming enterprises within Queensland. These are very loose and potentially disastrous terms which should be avoided in this legislation.

Construction requirements for a DPF/EPE

To build a DPF or ESE would be a totally cost prohibitive and unviable exercise as there would be a minimum standard required. Fences would need to be similar to what is described as a “Barrier Fence” (Biosecurity Bill 2013, Part 2 section 89) for the control of other introduced species classed as Restricted Invasive Animals, Category 3,4,6 under the Biosecurity Bill.

In practice a DPF or EPE would require the following:

- 20 m cleared on each side of the fence-line or 4ha per km.
- Continuous vegetation management via slashing and/or spraying.
- Adequate erosion and fire management control measures.
- A minimum of 2.1 m fence height netting fence with 17 lines horizontal and 150 mm vertical spacing.
- Posts at no more than 6m spacing, steel or hardwood construction.
- A minimum of 3 peg-downs between posts.
- Posts bored and tied, not stapled.
- Multiple strand, angled electric barrier fences on ground to preclude entry from dingoes, fox or pigs (which if not done would allow entry points for deer)
- Flood prevention gates and pipes on each water course and gully.
- Locked gates to preclude entry by unauthorised people
- Access roads along each side of the fence.
- Constant and regular surveillance and monitoring. (This would have to be of a high level as even this fence could be breached by illegal activity within minutes)

An estimation of the cost of such a fence would be in excess of \$50 per meter with additional annual costs of \$5 to \$10 / m for maintenance and surveillance.

At 200% to 300% more expensive than a standard deer fence, the requirement for deer farmers to comply by erecting a DPF/EPE to keep farmed deer behind would make the industry totally unviable and not achieve a single useful outcome.

This would then also preclude trapping as a control method except in the situations where Government, or the landowner subject of an order, is footing the exorbitant expense.

Points to consider.

There is little or no value of the inclusion of the terms DPF or EPE in future Acts and regulations, unless Government intends to actively police and enforce them as implied in the Feral Deer Management Strategy 2010-15 with penalties for non-compliance of up to \$80,000.

In the preparation of this submission, I have taken the view that Government will require local authorities to enforce these sections of the *Biosecurity Bill and Feral Deer Management Strategy 2010-15*. (1.1.4 Legislation). This will require a huge burden of administration and unnecessary red-tape.

Deer farmers within historically defined feral areas (*Deer Farming Act 1985, Gov. Gazette, Order in Council, Pages 383-84*) will be required to keep their deer behind a DPF or EPE, even when there are wild deer of the same species immediately outside of the enclosure.

If introduced, this regulation would require the following:

- Inspections on every deer farm and potential deer farm (Biosecurity Entity, *Biosecurity Bill 2013, section 141*) on a regular basis by DAFF or local Government staff to ascertain compliance and to issue infringement notices on farmers if their fences are not up to the regulation standard.
- A well-defined code of conduct and fence design policy so that farmers can repair existing fences or construct new ones to a legal standard.
- Fines and penalties to be associated with fencing breaches as described in the regulations.
- A method of handling disputes over issues such as non-standard fences being used for temporary grazing of livestock and the identification between farmed and feral animals both on farm and in the event of an escape.
- An auditing process to establish if deer are being removed from farms back to the wild without permission.

I believe section 1.1.4 of the Pest Act 2002 has no value to this Biosecurity Bill and should be not be included in future regulations. It only has the potential to restrict or stop a vital activity needed ie: deer farming/trapping, by making it unviable for landholders to proceed. It will create division between Government and industry and has no visible or positive environmental value.

Suggestions.

- A. In the RIDGE policy, it is suggested that the historic areas for wild deer be recognised and landholders within these areas be subjected to no extra fencing restrictions or requirements.
- B. For areas outside these historic areas, RIDGE suggests local councils be allowed to set standards for fencing and handling. It may be possible that some areas are designated as off-limits for farming species such as deer, goats or camels.

I personally endorse these suggestions as examples of practical solutions to complex problems identified within the *Biosecurity Bill 2013*.

Environmentally Significant or Sensitive Areas.

In the *Feral Deer Management Strategy 2010-15 (P. Jesser)* it is suggested that landholders have the option to retain a Pest Level 3 classification for deer within their holdings but adjacent to an Environmentally Significant Area (ESA) by installing a DPF. This suggestion has the potential to cause disputes between landholders and between landholders and Government. It also will cause huge environmental damage and should be removed from the legislation.

1. Initially, the term adjacent must be clarified. A. Does this term refer to an entire property even if the ESA is only on one small boundary? B. Will there be a buffer zone area between permitted Level 3 deer and restricted Level 2 deer? C. How will this be monitored and policed? D. What is the estimated cost of enforcing such legislation?
2. If one or more landholders adjacent to an ESA decide and agree to fence an area off but one bordering landholder does not agree, it will create an issue between these landholders. Can landholders be forced to fence?
3. If a freehold landholder decides to fence their boundary of the ESA but the majority of the ESA boundary is in council or NP control, disputes over the payment for the fencing would develop. (ie: Conondale NP, Sundown NP)
4. If all neighbours agree, an Environmental Impact Study would be required but would be extremely difficult if not impossible to achieve.

5. If an ESA was situated entirely on a landholder's property and was encircled by a DPF, thus limiting any grazing by deer or domestic stock, the resulting vegetation fuel build up would make it a high fire risk area. If accidentally burnt, it could negatively affect the environmental value of the entire ESA.
6. A barrier fence of this style would require over 4 ha of tree clearing per kilometre for the entire circumference of the ESA. Using the example of Conondale NP, it would require over 80km of fencing, a minimum of 300ha of tree clearing, for the cost of over \$4,000,000 initially.
7. This style of fencing (designed to be "deer proof") would become a death-trap to all native wildlife within as they would be easy prey along fence-lines for predators, would be severely impacted by the electric fencing required to stop pigs, fox and dingo and would be unable to migrate or access feed and water outside the ESA in times of drought.
8. Each ESA would need extensive predator control within the fenced area to provide some security for native species.

Suggestions for the control of species regarded as Invasive Animals:

My suggestion is that the *Biosecurity Bill 2013* and subsequent regulations include the following:

1. A section which defines the acceptance and use of Property Based Management Plans (PBMP). Any person or entity which adopted such a voluntary plan for their holding or group of holding would then be subjected to a far more cooperative, interactive and harmonious level of regulation.
2. Recognition is given to the defined historic areas for introduced species. Landholders within historic areas with a PBMP, can instigate or continue sustainable management practices for species acceptable to local authorities.
3. Unnecessary restrictions such as DPF/EPE are removed from the regulations on the condition that landholders within these areas establish a PBMP. Landholders farming deer be encouraged to maintain a secure fencing system which is regarded as "Normally Escape Proof" for deer and other farmed species (camels, alpacas, goats, buffalo etc). This can be assisted by the development of a commercial value for farmed stock.

4. Impacts of feral species on ESA's be managed under these PBMP's by the adoption of an overall holistic approach between adjoining landholders which avoids the use of DPF/EPE principles but instead adopts "Best Practice" concepts such as the use of fodder crops to attract feral species away from an ESA and the use of recreational hunters.
5. Local authorities are given the role to assist landholders with the establishment of these plans. Much of the interaction could be done online.
6. Recognition of a "HuntEasy" style system to provide self-regulation of all animal matter being transported from one Property Identification Code (PIC) land- holding to another or to a private residence. Landholders within historic areas, with a PBMP can then adopt the "HuntEasy" system to self-regulate animal matter movement by recreational and professional hunters.

Areas of concern for recreational hunters and professional guides within the Biosecurity Bill 2013.

In the letter from Dr John Robertson, Director Invasive Plants and Animals, Biosecurity Qld, to RIDGE Inc, dated the 6th September 2013, there are a number of questions raised from his statements that must be addressed if there is to be any certainty for guided hunting operators within this State.

Personal Use of game meat and other animal matter

Dr Robertson states that, *"..it is permissible under the Food Safety Act 2000 for an individual to move harvested deer meat from the premises where it was harvested only when it for the individual's personal use."*

In truth, the majority of all hunters in this country who harvest game meat for personal consumption supply this meat to other people; their wives, children, parents and guests in their homes. The official definition of *"individual's"* (singular, possessive) limits the use of this game meat to the person who has taken the animal.

This excludes most of the traditional use practices established for game meat in this country, from feeding your family, to two mates sharing a deer taken and even to a guide utilising the venison from a deer that an overseas client has taken as a trophy.

These statements also bring into question the legality of selling, supplying or transporting parts of feral animals listed as Restricted Invasive Animals as these parts (skins, horns, antlers, tusks, tissue etc) is clearly defined within the Bill as *“animal matter or material”*.

This regulation promotes wastage of a resource, promotes an indiscriminate “shoot and let lie” ethos and breaks with the very traditions that led to the red stag being on our Coat of Arms. If this is not the intent of this Bill, this section needs to be clarified and remedied.

Ecological Deer Management (EDM) and Quality Deer Management (QDM).

EDM is simply the scientific approach to establishing a balance of deer on any given property or group of properties. This can be done to suit a landholder’s personal requirements and can involve severe control measures if required.

QDM is the system many landholders are now using to bring forward the best results from a deer herd which will be utilizing recreational hunters as a harvesting method.

Dr Robertson (2013) states, *“The guide who leads a hunter to the location of a free roaming deer is neither offering nor supplying the feral deer, as the deer is not in the guides possession”*.

He also states that *“A landholder who allows a hunter to hunt on his property is not supplying a declared pest as the feral deer is not in the owner’s possession; it is simply on his land.”*

These statements show that the legalistic approach of Government is out of step with both the guiding industry and the proven management principles for deer known as Ecological Deer Management and Quality Deer Management. The implications of this misinterpretation of basic deer management principles, in place now for decades, if allowed to continue will have a devastating effect on guided and recreational hunting across all deer areas.

The combination of Guided and Recreational Hunting as a Management Tool

Quality deer do not simply appear, as if from a beam of light from Heaven, they are the result of careful planning over many decades based on the dedication to sensible and sustainable management of the entire deer population of an area.

These are some of the basic QDM principles used for deer in Queensland.

- Top quality male deer, carrying the best sets of antlers are known loosely as “trophy stags or bucks”, depending on the species of deer.
- These trophy stags in breeds such as red, rusa and chital are usually from 6 to 14 years old when taken.
- Successful QDM requires an unbroken “chain” of age groups within a herd to be maintained prior to harvesting at a given age i.e: 6 ½ years or older.
- This “unbroken chain” requires a landholder to knowingly and wilfully allowing these deer to remain on his/her holding for a given length of time prior to harvesting.
- QDM requires calculated and measured responses to the overall population level of each herd, with control targeted at any age, quality or gender excesses within.
- The QDM approach provides the best results from a herd when kept at a low overall population number within a given ecosystem, taking into account all other primary production activities being conducted in the area.
- QDM is a primary production activity based on managing free ranging deer while on the freehold and leasehold country of one or more landholders, acting in unison or individually.
- QDM is a method of “farming” a wild species using “Best Practice” procedures such as herd monitoring and research, hunter based harvesting, strategic cropping and fencing plus self-regulatory initiatives instead of high fences.

In essence, a landholder or a guide operating as the contractor to the landholder, are actively “husbanding” these wild deer as part of their primary production activities on the property. They actively promote for hunters to assist with this management as it produces better quality trophies for the future and therefore, higher hunter success

rates which in turn leads to more participation and better control of overall deer numbers.

If Dr Robertson's statements reflect the intent of this legislation then it is possible that intentional husbanding of free ranging deer by using recreational hunters to either protect or harvest sections of deer herds at given times of each year, is now an illegal activity. This issue requires immediate clarification if there is to be any certainty for the recreational and professional hunting industry as this issue affects not just deer but all other "game" species as well. The issue will also concern landholders as any activity which could be taken as being "illegal", would not be covered by insurance in the event of an accident.

Examples of QDM in action within Queensland.

Example 1.

A 60,000ha cattle property in North Queensland was historically carrying over 4,000 head of chital deer with a sex ratio of approximately 3 females to every 1 male deer. This imbalance was due to a pet meat shooting initiative which mainly targeted older age male deer (heavy carcasses). The herd was scattered, nocturnal and the trophy potential of the herd was negligible; the property was seen as undesirable by guides conducting business in the area.

Once QDM principles were applied by my business AWCA in conjunction with the RIDGE group, the overall population has been cut to 2,500 animals and the sex ratio is now 1 male to 1 female. Undesirable trophy antler trait stags have been severely culled as well as excess mature females for skins. The trophy potential of the herd is now on par or better than any other property in the area and sustains regular guiding operations. Other feral species such as wild pigs, dingoes, cats and rabbits are targeted during culling and trophy hunting events.

This property generates the income required from this operation to purchase quad-bikes and spray tanks plus chemical which is then used to control pest weeds like Parkinsania, Chinee apple, Box-thorn, Groundsel and others. Under a carefully monitored system, each vehicle entering or leaving the property is given a full wash-down to prevent pest weed spread to other properties. Details of all deer taken are

kept and regular health checks are conducted in conjunction with the University of Western Sydney and Dr Andrew Moriarty.

Example 2.

A 6,000ha cattle property was running approximately 150 red deer in a very nocturnal and pressured state due to indiscriminate shooting operations and poaching by locals. This population level was reduced by trapping from a historic level during the early part of last century of approximately 1,200 deer. Since the deer farming period, it had produced no income back to the landholder in any way.

Under a QDM project, the property is now running a herd of 400 top quality red deer. This sustains a regular guided and non-guided hunting season as well as regular culls for excess female and lower quality genetic animals.

The annual economic return from this project is hard to determine as many hours of volunteer work is done to protect the property from illegal hunting operations and to remove other more important pests like dingoes. Ongoing monitoring and evaluation by the RIDGE group would suggest a return of over \$20 per cattle grazing area/year.

The funds returned are directly put towards spraying invasive lantana and Giant Rats Tail Grass (GRT) which is re-infecting from the huge burden of these serious pest weeds within nearby crown land areas.

Unless there is clarification of the legality of sustainable management practices for certain species listed as Pests within the legislation, there can be no future for what is considered to be “Best practice” management.

Feral Animal and Weed Control

Most landholders have adopted the responsibility to control feral animals and pest weeds. My personal opinion is that Government legislation should assist landholders to manage this responsibility in a cooperate manner and should remove unnecessary legislative obstacles. These points will also need clarification:

- A landholder with Forestry leases has the obligation to control feral animals and pest weeds. Are leaseholders allowed to use firearms to control these animals and to assign this task to people working under their direction? It is suggested under the RIDGE Wild Deer Policy 2013 that a PBMP system would address this issue and others such as pest weed spread, while allowing for full traceability, high safety standards and safeguards.
- Under the *Weapons Act*, there is a requirement for only firearms registered for Primary Production to be used for pest control on some feral species. Can this issue be clarified and amended if necessary to allow landholders and their associated recreational hunters to comply in an unrestricted manner?
- Can a landholder, fulfilling his/her obligation to control pest animals/weeds on their leases, utilize these pests in any manner?
- The biggest invasive pests within most parts of the main deer range in South East Queensland are without doubt, the Lantana, GRT and Cat-claw weeds with the biggest infestations of these pests on Crown land. Can Biosecurity justify the emphasis being placed on deer control in comparison to the pests which are causing landholders huge financial loss and inconvenience?

Camels and Buffalo

Under the proposed *Biosecurity Bill*, species such as Camels and Buffalo are non-declared. Both camels and buffalo have caused extensive environmental damage across wide areas of inland and Northern Australia. The population of wild camels is now estimated by many within the industry at over 1,000,000 animals and the area they inhabit is made up of many NP's and fragile ecosystems. This area is absolutely huge in comparison with the area inhabited by deer.

If the markets for wild camels are subject to the same fate as befell the deer industry, will landholders simply release these camels back into the environment as deer farmers did?

- What safe guards are in place to address this issue?
- How can a major invasive pest such as camels, once taken outside their known feral area, be allowed to be contained behind fences that they are well

known to destroy totally, when it is suggested that farmed deer within feral areas be subjected to extreme regulations?

Hunting as a different activity to Shooting

Hunting as a part of a person's culture is clearly recognised under the Animal Care and Protection Act 2001, page 14, section 8 which deals with exclusions from the Act for persons of Aboriginal or Torres Strait Island descent. People of this area almost totally, "hunt" for their traditional animals (dugong, turtle, birds, fish, pigs and deer) with a high level of respect.

The bond between the Kaurareg traditional owners of the area and wild deer is linked with their deep history of trade between Indonesia, PNG and mainland Australia developed over the centuries. To simply "shoot" deer as part of eradication or control strategies is a wasteful concept which is entirely abhorrent to them.

With the exception of the Kaurareg people, whose ancestry is suggested as being close to 3000 years old and linked with Papua New Guinea, many people of Torres Strait descent trace their ancestry back to the influences of South Sea islanders (Western Pacific), Chinese, Japanese and other nationalities from the early 1800's onwards. (Torres Strait: A history of Colonial Occupation and Culture Contact 1864-1897, Mullins, S 1995)

As a European Australian, who can also trace my family history in this country back to the early 1800's as well, I sincerely believe I can also rightfully claim a similar "hunting heritage". This hunting heritage is linked with the animals introduced to this country for that very purpose.

I firmly believe all Australians who wish to recognise a "hunting heritage" which is imbedded in their ancestry, should be allowed to do so and this should never be confused with eradication shooting. Any legislation which excludes one part of our society from a right which is given to another is being discriminatory and should be amended immediately.

Closing Comments

The areas that I have addressed above are just a few of the many which will affect a wide range of businesses and individuals within our community. I would hope that others have been able to prepare submissions in the unrealistically short period of time allowed, so that their individual concerns can be properly addressed.

I find the proposed *Biosecurity Bill 2013* and associated documents such as the *Feral Deer Management Strategy 2010-15*, to be inconsistent, biased, overloaded in unnecessary red-tape and lacking totally of the indication of any cooperate or harmonious relationships being developed with rural people. I believe it will be absolutely detrimental to my business across all of its inter-related activities which have been established legally over many generations.

This Bill should protect and enhance tourism and agriculture by lowering the burden of red tape which is stifling these industries but I feel it will have the opposite effect. Hunting, fishing and adventure tourism has the ability to build links between city and bush folk, promotes and strengthens the parent/child relationship and produces an income stream which flows directly into local communities. I would respectfully ask the AREC to treat this proposed Bill with absolute caution and request significant changes before it is allowed to be passed into law.

Yours sincerely,

Clark J McGhie