

29 March 2023

Dear Annelise,

WILDLIFE HEALTH AUSTRALIA SUBMISSION ON THE DRAFT FERAL DEER ACTION PLAN 2022-2027

Thank you for providing Wildlife Health Australia with the opportunity to provide feedback on the Draft Feral Deer Action 2022-2027.

In this submission we provide comments on areas where we feel more clarification or explanation is required. In addition to this, as the majority of emerging infectious diseases affecting humans and animals in Australia and worldwide arise in wildlife, we provide suggestions of where we feel the Action Plan can be strengthened from a wildlife health perspective.

Thank you again for the opportunity to comment and good luck with this important work.

Best wishes,

Rupert Woods AM

CEO, Wildlife Health Australia

WHA COMMENTS ON THE DRAFT FERAL DEER ACTION PLAN 2022-2027

Wildlife Health Australia support the need for a national approach to feral deer management, and the Draft Feral Deer Action Plan (the action plan) is a good first step. The following comments are predominantly around disease and biosecurity, surveillance, and wildlife health management. We also provide general comments, observations and suggestions for additional text and actions to be included in the action plan on economic and social impacts and specific activity for First Nations Peoples.

Feral deer and disease

- WHA note that feral deer and the risk of transmission of diseases and parasites are referred to in the action plan. Seventy per cent of infectious diseases come from the environment and sixty per cent of those from wildlife. Despite a number of recent projects studying disease in deer in Australia, there are significant gaps in deer disease prevalence data requiring the need for more surveillance and monitoring.
- Surveillance is mentioned several times in the document mainly in terms of mapping where and how many deer there are, for example around peri-urban areas/ cities. Surveillance is not referred to in terms of the potential for disease surveillance and monitoring of wildlife and environmental health. There is an opportunity in the action plan to include disease monitoring and surveillance as a priority action area for the benefit of broader biosecurity and environmental outcomes in support of reducing impacts on agricultural, environmental, cultural and social assets.
- There are a number of diseases that infect deer that are on the [national notifiable animal disease](#) list. In addition to the above, a comprehensive list of feral deer endemic and exotic disease risks could be included in the document. The list could include information outlining the disease name, the type of organism (e.g. virus, bacteria fungus or parasite), and whether the disease poses risks to human (e.g. zoonotic), agriculture and the economy and native species. WHA have developed fact sheets that provide information on [endemic](#) and [exotic](#) feral animal diseases, including deer related diseases that can assist with this task.
- Of note, a disease of concern that impacts farmed and free-ranging (and is on the national notifiable animal disease list) is [Chronic Wasting Disease](#) (CWD). It is from a disease group known as [transmissible spongiform encephalopathies](#) that include diseases like bovine spongiform encephalopathy (mad cow disease) in cattle and scrapie in sheep and goats. Although there have been no cases in Australia to date, the disease has been found in the deer, elk or moose in the United States, Canada, South Korea, Norway, Finland and Sweden. In affected species it is transmissible and always fatal. There have been no reported cases of CWD infection in humans. However, concern over the potential for [CWD to be transmitted to humans has been raised](#) following successful experimental infection of two species of nonhuman primates. In the United States, the Center for Disease Control and Prevention advise against human consumption of CWD-infected animal parts or products.

Biosecurity

- Biosecurity is referred to several times in the action plan, in terms of risk and community safety. However, there are significant biosecurity risks should an emergency animal disease involve feral deer. There are also potential general biosecurity risks to people and the environment from feral animal carcasses. Therefore, it is important to emphasise the need for biosecurity guidance to be in place to cover a broad range of hazards.
- Biosecurity protocols are referred to (page 41) however what protocols or risk analysis framework will be utilised is not articulated. WHA have developed the [National Wildlife Biosecurity Guidelines](#). These guidelines help people to understand disease risks and how to protect themselves, and better understand the disease risks specific to their own situation and improve their biosecurity practices.

One Health

- There are also opportunities for the action plan to articulate linkages to One Health approaches. The One Health approach recognises that the health of humans, domestic and wild animals, plants, and the environment (including ecosystems) are closely linked, and interdependent. [Actions within the One Health](#) approach are aimed at reducing the impact of zoonotic disease, [food safety risks](#) and antimicrobial resistance.
- International studies from Japan, UK, Portugal, Italy, and North America are also detecting antimicrobial resistance bacteria in multiple species of deer. Feral deer may act as reservoirs and contribute to the spread of antimicrobial resistant bacteria between human, livestock, and natural environments.

General Comments

- **Indigenous groups** – Indigenous groups are mentioned in terms of the action plan’s guidance and action “Indigenous groups seeking to protect areas of cultural values” (page 5) and again in terms of damage to traditional owners cultural sites from feral deer. However, WHA note that there are no specific strategies proposed that include Indigenous groups. WHA are aware that although it is not specifically referenced, the National Feral Pig Action Plan has an [Indigenous Advisory Panel](#) as part of its governance structure. This approach could be useful as part of the governance structure for the Feral Deer action plan to inform and guide future activities when the action plan becomes operational.
- **Economic impacts**- WHA note that economic impacts are described for agriculture and primary industries (page 8), however there are economic impacts to human populations that are not involved in these industries. Economic impacts can also arise through impacts on wildlife that in turn can impact tourism and human movement. Economic impacts also arise from costs to address conservation and repairs of social and recreational assets.
- **Social impacts** – In addition to the health and wellbeing risks identified in the social and cultural impacts section (e.g., vehicle collisions and potential disease reservoirs), there are other impacts that could be included in the text along with activities on how to address them. For example, the social impacts to mental health from dealing with the ongoing

incursion of feral deer; costs and financial security at the family and community level; community conflict and tension; and impacts to quality of life.

- **Baiting** – In the Action 1.5 section (page 22), “Ensure *current best practice tools and approaches for managing large feral deer populations, and those in peri urban environments, are consistent and updated in COPs, SOPs, manuals, planning guides and cost-benefit summaries, and that best practice considers animal welfare and impacts on both feral deer and non-target wildlife*”. WHA would like to see that it is clearly articulated in the action plan how risks to non-target wildlife will be addressed.
- **Technical terms** - There are many technical terms in the document that require more explanation or definition. WHA suggest a glossary of terms.
- **Communication messages** – The communication messages (page 38) overall are comprehensive. However, WHA would like to highlight that the second dot point “*Feral deer have impacts on agriculture, the environment, threatened species, cultural assets, our special places, regenerating bushland, community safety, and they pose risks of disease transmission to livestock and wildlife*” does not include the risk of deer acting as a potential reservoir for disease for humans. WHA suggest that humans are added to the sentence in line with social and cultural impacts described on page 8. WHA would also like to suggest that there are opportunities to include, as part of the communication plan, health messages to raise awareness and provide advice on how to manage health risks to humans, livestock, wildlife, and environment.

ABOUT WILDLIFE HEALTH AUSTRALIA

Wildlife Health Australia (WHA) is the peak coordinating body for wildlife health in Australia and operates nationally. The head office is in Sydney, NSW. Our mission is to lead national action on wildlife health to protect and enhance the natural environment, biodiversity, economy and animal and human health through strong partnerships.

WHA has 45 member organisations and over 750 individual members. Our membership operates as a network that includes government agencies (including environment, health, and agriculture portfolios) and non-government partners (including universities, independent researchers, zoos and aquariums, private veterinarians, and rehabilitators). We work with up to 120 different government and non-government agencies and organisations on a regular basis and our members are invariably requested to assist with any wildlife health issues occurring within Australia.

WHA activities focus on the increasing risk of emergency and emerging diseases that can spill over from wild animals and impact on Australia's trade, human health, biodiversity, and tourism. We provide a framework for Australia's general wildlife health surveillance system that allows Australia to better identify, assess, articulate, and manage these risks. WHA assists Australian governments as the central part of our national wildlife health system and reports to the Agriculture Senior Officials Committee (AGSOC) via the Animal Health Committee and the National Biosecurity Committee and has observer status on the Environment and Invasives Committee and the Consultative Committee for Emergency Animal Diseases. WHA is custodian of the [National Emergency Wildlife Disease Response Guidelines](#).

WHA is increasing its capacity to engage with a broader network of key stakeholders that have not been previously involved with the organisation, and this includes stakeholders in feral animal disease surveillance and feral animal management.

More information on Wildlife Health Australia is available at:

<http://www.wildlifehealthaustralia.com.au>.