Address for reply: PO Box 818, Katoomba NSW 2780

May 2023

Lazare Eloundou Assomo
Director, UNESCO World Heritage Centre
7 Place de Fontenoy, 75352 Paris
CEDEX 07, France
Email: L.Eloundou-Assomo@unesco.org

CC:
Himalchuli Gurung, Chief of Asia Pacific Unit, UNESCO World Heritage Centre
Peter Shadie, Director of IUCN's World Heritage Program
Peter Cochrane, IUCN Councillor, Oceania
The Hon Tanya Plibersek, MP, Australian Minister for Environment and Water
Roger Jaensch, MP, Tasmanian Minister for Environment and Climate Change
Jo Palmer, MP, Tasmanian Minister for Primary Industries and Water
The Hon Ted Baillieu AO, Chair, Australian Heritage Council

Invasive deer threaten Tasmanian Wilderness World Heritage Area

Dear Mr Eloundou Assomo,

We are writing about our great concern over the increasing biosecurity threat that invasive species, particularly invasive fallow deer, pose to the natural values of the Tasmanian Wilderness World Heritage Area (TWWHA).

The 2015 IUCN Reactive Monitoring Mission to the Tasmanian Wilderness highlighted biosecurity as a major concern and management priority. However, the actions of Australia (the State Party) and Tasmania (the subnational entity) on biosecurity, and especially deer, in the TWWHA remain inadequate in relation to the extent and severity of the impacts on the Outstanding Universal Values.

While the Tasmanian government has plans to manage biosecurity threats in the TWWHA, we are concerned that these plans and the dedicated resources are insufficient to mitigate the negative impacts posed by deer and other invasive species in the area.

The current situation

- Over 150 invasive species have been documented in the TWWHA, including fallow deer [1]
- Climate change and fire interactions will likely facilitate the spread of invasive species within the TWWHA, particularly deer, rabbits, European starlings, and exacerbate their impacts [2]
- The deer population across Tasmanian is increasing at a rate of approximately 11.5% per annum [3] and is likely approaching 100,000 [4]
- It is projected that, without significant intervention, one million deer could range over 56% of Tasmania within 30 years [5]. This includes the eastern regions of the TWWHA and the bordering regions
- Without serious intensification of control efforts in the bordering regions, deer will establish a contiguous population along the TWWHA's northern and eastern borders, allowing continued invasion of the TWWHA
- The latest habitat suitability modelling demonstrates that several areas of the TWWHA could suit deer [3] (see Appendix A). Climate change and changing fire regimes will increase the areas of suitability, enabling deer's further incursion into the TWWHA [2]
- Invasive deer damage native vegetation and ecologically sensitive areas, including hindering post-fire recovery of the slow-growing, fire-sensitive vegetation found throughout the TWWHA, with negative impacts for both biodiversity and the Aboriginal cultural landscape
- There has been a 19-fold increase in deer activity in areas burnt in 2019, compromising the recovery of these fire-sensitive ecosystems [6]

Invasive deer reduce the resilience of the property to climate change impacts

- Invasive species and bushfires are key drivers of biodiversity loss in Australia as climate change continues to alter fire regimes [7]
- The TWWHA is already facing record droughts and increased fire frequency, which are predicted to worsen into the future [8]

---

[1] Tasmanian Wilderness World Heritage Area Biosecurity Strategy 2021-2031
[2] Press, AJ (Ed.) 2016 Tasmanian Wilderness World Heritage Area Bushfire and Climate Change Research Project. Tasmanian Government, Hobart.
[3] Cunningham, C., et al. (2021) Dynamics and predicted distribution of an irrupting 'sleeper' population: fallow deer in Tasmania. Biological Invasions, 24(4), 1131-1147.
[4] Invasive Species Council (2021). Feral Deer Control: A Strategy for Tasmania.
[5] Potts, J. M., et al. (2015). Predicting the future range and abundance of fallow deer in Tasmania, Australia. Wildlife Research, 41(8), 633-640.
[6] Driessen, M., et al. (2020) Monitoring priority wildlife in the Tasmanian Wilderness World Heritage Area: A pilot survey on the Central Plateau. Nature Conservation Report.
[7] Australian State of the Environment. (2021)
[8] Intergovernmental Panel on Climate Change (2022) IPCC Sixth Assessment Report

- The growing pressure of invasive species populations alongside climate change threatens to lead to persistent and potentially irreversible negative impacts on the natural and cultural values of the TWWHA
- The increasing impacts of invasive deer on the Outstanding Universal Values of the TWWHA will reduce the resilience of the property to ongoing effects of rapid climate change

Australian and Tasmanian Government action to date

The Invasive Species Council last wrote to UNESCO about the risks posed by the expanding invasive deer population in 2020. Since then, notable progress has been made, including:

- The Tasmanian government's TWWHA Biosecurity Strategy 2021-2031, backed by $3.27 million over the next four years
- A commitment to eradicate deer from the TWWHA in the Tasmanian government's 2022-2027 Fallow Deer Management Plan, supported by $2 million over the next four years
- An aerial cull trial to occur in the Walls of Jerusalem within the TWWHA in May 2023 and May 2024, supported by $440,000 from the Australian government
- A Draft National Deer Action Plan for Australia that recognises the serious environmental impacts of feral deer and the urgent need for significant control efforts across Australia

While these are positive steps, these actions are insufficient to meet obligations to protect the outstanding natural and cultural values of the TWWHA from biosecurity threats, especially from invasive deer.

Issues include:

- The scale of planned shooting operations in the Walls of Jerusalem is likely below what is required to eradicate deer from the entirety of the TWWHA within the planned timeframe
- The current financial commitment is below what is required for successful eradication of deer and biosecurity management more generally in the TWWHA
- Most of the land adjacent to the northeastern region of the TWWHA is in the 'Sustainable hunting zone' in the 2022 Tasmanian Fallow Deer Management Plan (see Appendix B). Within this zone, deer are partly protected under Tasmanian law. This legislation mandates the existence of deer and hinders effective control, thereby allowing reinvasion of the TWWHA

What is needed

To protect the TWWHA, it is vital that the Australian and Tasmanian Governments commit the resourcing required to eradicate invasive deer from the TWWHA and ensure the population in the adjacent lands is effectively managed to prevent reinvasion. To this end, it is vital that invasive deer are no longer afforded partly protected status under Tasmanian law.

We acknowledge the positive steps the Tasmanian government has made towards addressing biosecurity threats to the TWWHA, including invasive deer. However, as long as invasive deer remain protected in the adjacent region and without a long-term commitment of resourcing, the State Party will fail to meet its obligations.

When it comes to invasive deer, the State Party has yet to fully implement all the recommendations made by the 2015 Reactive Monitoring Mission to the Tasmanian Wilderness Report (RMM), specifically:

> *Recommendation 18*
>
> *The State Party should fully reflect biosecurity as a cross-cutting and permanent management priority in the Management Plan and ensure and, as required, step up financial and human capacity to monitor, prevent and manage biosecurity risks.*
>
> *Recommendation 19*
>
> *The State Party should fully consider the linkages between the property and adjacent lands, including the increased length of boundaries shared with private land as a result of the 2013 Minor Boundary Modification.*

We therefore request that you remind the State Party of its obligations under the World Heritage Convention to prioritise action on biosecurity threats both within the TWWHA and the adjacent lands. This will require greater investment into long-term, coordinated management across the TWWHA and the adjacent regions.

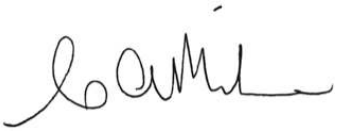
We ask that you seek an update from the State Party on how it plans to address these biosecurity issues in the long term and what steps it is taking to fulfil its commitments. The most recent State Party Report on the State of Conservation of the Tasmanian Wilderness (2022) makes no mention of invasive deer, invasive species, or biosecurity, despite the increasing threat these issues pose to the Outstanding Universal Value of the property in the face of climate change.

The rapid growth of invasive deer populations and the increasing pressure of climate change means that decisive action is urgently needed to protect the outstanding natural and cultural values of the TWWHA.

If you have any questions or wish to be briefed on this matter, please contact Dr Tiana Pirtle at tianap@invasives.org.au.

Yours sincerely,

Andrew Cox
CEO, Invasive Species Council of Australia



Christine Milne AO
Ambassador, Invasive Species Council of Australia

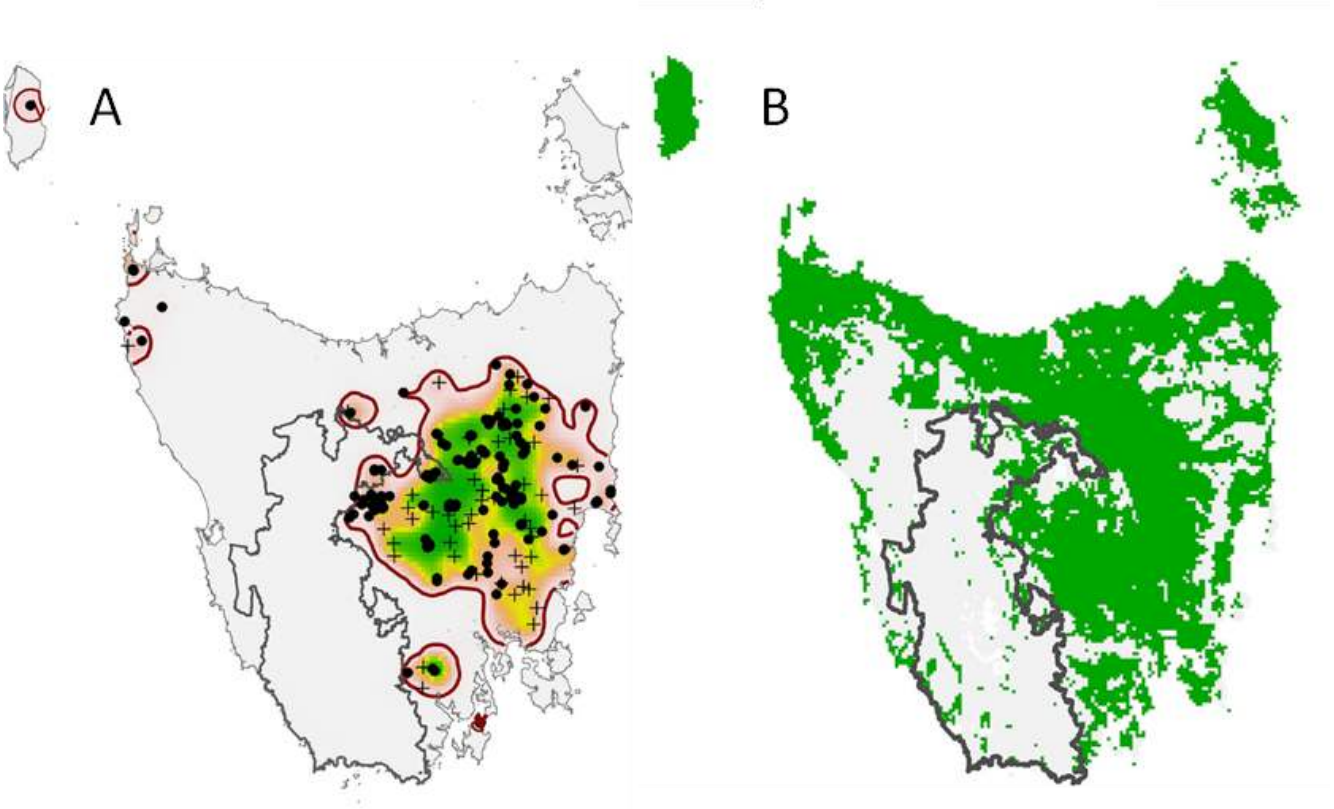
Nicholas Sawyer,
President, Tasmanian National Parks Association

Jimmy Cordwell
Tasmanian Wilderness Campaigner
Wilderness Society Tasmania

Andry Sculthorpe,
Tasmanian Aboriginal Centre

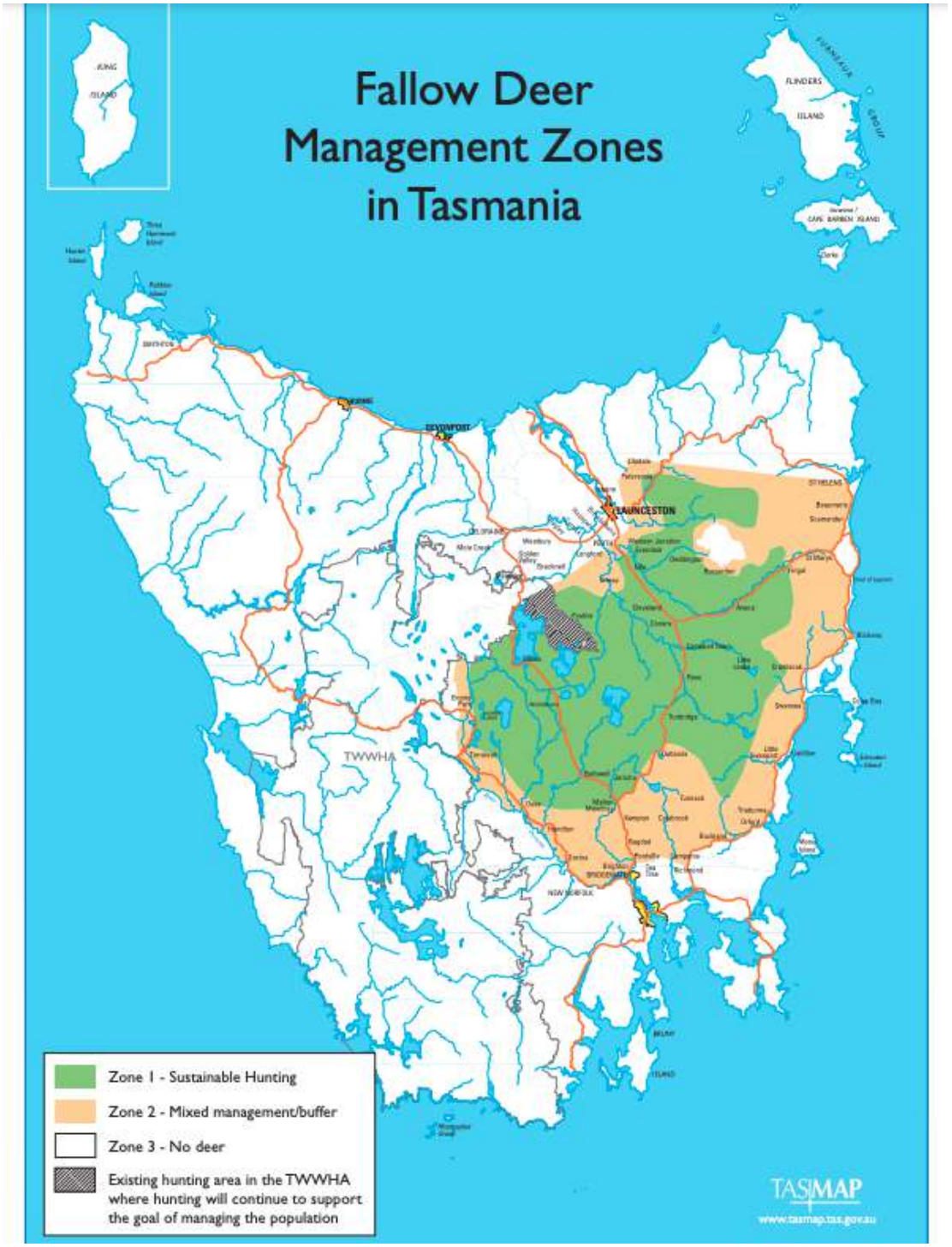
Bob Brown,
Bob Brown Foundation

Appendix A



Conservatively estimated fallow deer distribution in Tasmania (A). Dots and crosses indicate deer observations, with colour denoting probability of deer detection. The bold grey line indicates the boundaries of the TWWHA. Habitat suitability modelling suggests 56 % of Tasmania is suitable for fallow deer (B), including several areas of the TWWHA. Figures from Cunningham et al. (2021).

Appendix B



Management Zones from the 2022 Tasmanian Fallow Deer Management Plan. The adjacent lands around the northeastern part of the TWWHA (light grey line) are surrounded by the Sustainable Hunting Zone, in which the goal is to maintain a deer population as a hunting resource and as such there are restrictions on deer management.