



THE COLONG FOUNDATION FOR WILDERNESS LTD.

Thursday May 19th, 2016

Pest Animal Review
Natural Resources Commission
GPO Box 5341
Sydney NSW 2001
email nrc@nrc.nsw.gov.au

Dear Sir/Madam,

**Submission to Natural Resources Commission NSW regarding
the Draft Pest Animal Management Review Report**

The Colong Foundation supports most of the recommendations made by the Natural Resources Commission in its draft report *Shared Problem, Shared Solutions - Pest Animal Management Review*, in particular the recommendation to declare deer a pest in NSW.

As the Commission would know, large pest species have become a threat to public safety. In the Illawarra Region collisions between motor vehicles and feral deer have caused nine human fatalities in a seven year period, and there have been a hundred collisions between deer and trains. Similarly the growing number feral horses in Kosciuszko National Park are now starting to increase horse on motor vehicle accidents.

It is wrong to have special treatment of feral deer and horses when public safety is in question. The Commission's recommendations in relation to deer should apply to feral horses. Recommendation 20 should be amended to require feral horses to be removed from national parks and other environmentally sensitive areas by the most effective and humane method – aerial shooting.

Aerial shooting of feral cattle in environmentally sensitive areas should also continue in national parks for example.

The Colong Foundation does not, however, support recommendation 24 of the report, as the creation of a market for pest animals creates an incentive for the retention of breeding females, as evidenced by the poor pest control of feral goat populations in Mutawintji National Park. Commercialisation of feral animals has a second adverse consequence. It creates an incentive for the spread of pests to create new populations of the pest to increase financial opportunities.

Red tape regarding hunting on private land should be retained

Given the above concerns regarding hunting and the associated spread of pest species for game purposes, the Colong Foundation does not support **Recommendation 23**, and in particular Recommendation 23(ii).

Promotion of the use of approved hunting organisation membership and programs to link hunters with landholders will lead to perverse outcomes where “canned hunting” of pest occurs and populations of vertebrate pests are retained on farms to encourage hunting opportunities for commercial gain.

Red Tape is needed because it is necessary to prevent perverse outcomes by hunters (and farmers) who are more concerned with their individual pleasure from hunting or financial benefit than the welfare of the community or protection of the natural environment. “Canned hunting” is a real prospect in the Central West where it may be more profitable to run a small leasehold property for hunters than it is to effectively manage vertebrate pest populations.

The Colong Foundation also opposes **Recommendation 1(iv)** as it is simplistic nonsense. Removal of red tape improves nothing as far as pest control is concerned. It can only reduce paperwork, governance and oversight.

If paperwork is truly needless, then it should be done away with, but usually there is a sensible method and reasons for the red tape. Often a better solution is the development of more efficient processes, not abolition of oversight. For example, there are now on-line webform software technologies that make the paperwork quicker and easier. Such technologies can be accessed from the farm and can work efficiently.

Fixing the paperwork is better than abolishing it, and ensuring it is fit for purpose. The other advantage with on-line paperwork is that it can be adapted and modified easily.

The Colong Foundation supports the following recommendations:

- Feral deer should not be a game animal (**recommendation 16**), and must be managed as a pest animal to stop curb environmental harm. The rainforests of Royal National Park have, for many decades, had a ‘browse line’ below which everything has been eaten by deer. These deer impacts are now being expressed in our rainforest heritage across the state, slowly destroying this internationally important element of our State’s ecology. Further, deer eat vital wildlife habitat, eliminating important bird habitat.
- A state-wide feral deer containment plan (**new recommendation**). This recommendation will ensure limited resources are used most efficiently to contain and suppress these pests.
- Mandatory cat desexing and designation of areas requiring cat containment (**recommendation 17**) (see further comment below).
- Remove game status for invasive exotic birds (**recommendation 5**) (see further comment below).
- Stronger controls on keeping invasive pet birds (**recommendation 5**) and compliance for illegal pet collecting (**new recommendation**) (see further comment below).

- Support aerial (as well as ground) shooting of feral goats, cattle and camels under RSPCA endorsed protocols (**new recommendation**).
- More emphasis on prevention (**recommendation 1**), surveillance and early eradication of pest species (e.g. imported red fire ants).
- Support aerial (as well as ground) shooting of feral horses under RSPCA endorsed protocols (add to **recommendation 20**).
- More resources for strategic pest control and research, including research for novel approaches such as rewilding (**recommendations 1 and 26**).
- Act to prevent the spread of aquatic pests such as carp and tilapia and preventing new escaped aquarium fish (**new recommendation**).
- Build a barrier according to the guidelines of Knight (2010) to prevent redfin perch colonising the Kedumba River and harming endangered Macquarie perch. The same barrier protection should be constructed for the Grose and Wollangambe Rivers to protect populations of endangered Macquarie perch present in those streams (**new recommendation**) [reference <http://www.molecularecology.flinders.edu.au/uploads/54834/ufiles/pdf/63-mp-coge09.pdf>].
- Retain dingo conservation areas inside national parks under the Biosecurity Act (**recommendation 18**).
- “Non-managed” honeybees should be subject to a pest animal determination (**new recommendation**) (see further comment below).
- Make the release of feral animals a serious environmental crime subject to fines commensurate with the ecological impacts that they could instigate. The ecological costs should be determined by best practice analyses by independent economists (**new recommendation**).

Remove the dingo from the list of pest animals

Current wild dog management in NSW aims to protect Dingoes in their core habitat areas. But, as a previous Regulatory Review Committee of the NSW Parliament has noted, “it is however anomalous that the main NSW initiative to conserve existing Dingo populations is being undertaken under an Act that will classify them, state-wide, as a pest requiring eradication.”

Dingoes play a useful ecological role by preying on feral pigs, goats, deer, and also kangaroos which, in high numbers, deplete rare plants. Dingoes suppress foxes, and there is evidence that they also suppress feral cats, although scientists disagree about the extent to which this occurs.

Aggressive eradication of wild dogs and tokenistic Dingo conservation efforts are not going to reverse the extinction of the Dingo, which is primarily caused by interbreeding with feral dogs.

A Dingo protection program should be developed by those with expertise in the Dingo's role as a top predator. These experts must be independent population/community ecologists - not individuals primarily concerned with stock losses (add to **recommendation 18**).

Future research should aim to build on data that has substantiated the positive role Dingoes play in suppressing cats and foxes, and NSW pest animal policy should be adjusted to reflect this.

Effective Oversight for regional pest management committees and their operations

The Local Land Services (LLS) Boards must possess skills in natural resource management, biodiversity conservation and environmental biosecurity if it is to provide oversight for regional pest management committees (**Recommendation 3**). Without these skills, which currently are not mandatory, then the LLS Board will not provide effective oversight of pest management operations.

The responsibilities of State-level Pest Animal Council and the Biosecurity Advisory Committee include review the operation of current pest management activities so as to identify gaps in current programs and opportunities to improve these programs. The Council and Committee should also respond early to future risks identified during consultations with LLS Boards and regional pest management committees.

Control of feral bees

"Non-managed" honeybees should be subject to a pest animal determination due to their listing as a key threatening process (**new recommendation**). The listing confirms the significant negative impact of honey bees on forest ecosystems, particularly old growth forest ecosystems. Just as large feral mammals, such as deer, goats, horses and cattle, have a significant negative impact on national parks, so too do smaller invertebrates. =. Honeybees impact on indigenous species in two broad ways, firstly via competition for tree hollows, and secondly via competition for floral resources ... In view of the above points, the Scientific Committee was of the view that competition from feral honeybees *Apis mellifera* L. could cause species that are not threatened to become threatened. Consequently, this process is listed as a Key Threatening Process in Schedule 3 of the Threatened Species Conservation Act 1995. See <http://www.environment.nsw.gov.au/determinations/FeralHoneybeesKTPListing.htm> (09052016)

"Australian fauna, particularly birds and mammals, make extensive use of this structural element of habitat, and at least 20% of bird species (Saunders et al., 1982) are hollow-dependent. All arboreal marsupials use tree hollows, and all except the Koala are dependent upon them for shelter and breeding sites (Lindenmayer et al., 1991). Tree hollows are also used by many species of *microchiropteran* bats and small *scansorial* mammals (Dickman 1991, Lumsden and Bennett 2000) ... Threatened species which are likely to be affected by competition from honeybees for hollows include the Brush-tailed Phascogale, *Phascogale tapoatafa*; Squirrel Glider, *Petaurus norfolcensis*; Yellow-bellied Glider, *Petaurus australis*; Major Mitchell's Cockatoo, *Cacatua leadbeateri*; Glossy Black Cockatoo, *Calyptorhynchus lathami*; Superb Parrot, *Polytelis swainsonii*; and Regent Parrot, *Polytelis anthopeplus*. Populations of protected species that may become threatened include the Common Brushtail Possum, *Trichosurus vulpecula*; Greater Glider, *Petauroides volans*; and Sugar

Glider, *Petaurus breviceps* (Garnett 1992, Oldroyd et al. 1994, Paton 1996, Soderquist et al. 1996, Trainor 1995, Wood and Wallis 1998, Pyke 1999, Soderquist 1999).” See <http://www.environment.nsw.gov.au/determinations/FeralHoneybeesKTPListing.htm> (09052016)

Honeybees, both feral and managed, are frequent visitors at flowers, and often remove 80% or more of the floral resources produced (Paton 1996, 2000). This can result in competitive displacement of native fauna that use the floral resources, including honeyeaters (Paton 1993) and native bees (Sugden and Pyke 1991, Paton 1996, Sugden et al. 1996, Schwarz and Hurst 1997, cf. Spessa 1999). See <http://www.environment.nsw.gov.au/determinations/FeralHoneybeesKTPListing.htm> (09052016).

Better control of cats is supported

The Colong Foundation strongly agrees that feral cats should be treated like feral pigs and goats that also cause significant damage. Cats are a major killer of wildlife and can be present at high densities but unlike pigs and goats are cryptic and solitary.

The proposed **recommendation 17** is strongly supported including the recommendation that requires local government to declare and enforce appropriate containment areas for domestic cats to prevent predation of native wildlife in urban areas, and the escape of domestic non-desexed cats.

The Colong Foundation also strongly supports the evaluation of cost-effective and humane control techniques prioritising feral cat control. A safe biological control to eradicate feral cats is badly needed as there are so many in the natural environment that effective control by trapping or baiting has proven difficult.

The Colong Foundation also supports strategies that encourage and require responsible cat ownership. The Colong Foundation supports Australian Government’s Threatened Species Commissioner call for ‘24-hour containment requirements for domestic cats, particularly close to identified conservation area of significance.’

The Colong Foundation supports amendment of the *Companion Animals Act 1998* to provide local government with powers to impose and enforce cat containment rules.

Ban Game Birds farms and include these non-native birds on the list of pest species

There seven feral bird species listed as game birds which do not occur in the wild in NSW. These are Bobwhite Quail, California Quail, Guinea Fowl, Partridge Europe, Peafowl, Pheasant and Turkey. All have formed feral populations elsewhere in the world. Five have formed feral populations in other states of Australia.

These birds can only be hunted if they are released into outdoor situations, creating a risk of the formation of t feral populations.

Hunters have been responsible for some of Australia’s worst pest problems, including the red fox, an agent of extinction and major agricultural pest.

Game birds are the next pest after deer that hunters will release. This must be stopped. The Colong Foundation strongly supports the proposed removal of Game birds from the *Game and Feral Animal Control Act 2002* and prohibition of their release in NSW. Gabe birds, , as with deer, horses and cattle are feral pests in national parks. For these reasons **Recommendation 5** is strongly supported.

Make the release of feral animals a serious environmental crime

Release of feral animals, such as the release of deer on public lands, and the release of so-called "game birds" are criminal offenses. Jail terms should apply for offences involving large pest numbers or multiple release sites (**new recommendation**).

Pest cause millions of dollars in damage and destroy nationally and internationally significant natural habitats. They are ruining national parks in NSW. The wilful release of pest species such as yellow crazy ants would have a devastating impact of Australia and should carry a very heavy penalty, even greater than that applying to arson.

Thank you for the opportunity to comment on this draft report.

Yours sincerely,



Keith Muri
Director
The Colong Foundation for Wilderness Ltd