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Natural Resources Commission,

GPO Box 5341,

Sydney NSW 2001.

I write in response to the draft report into the State-wide review of pest animal management.

Firstly, it must be stated that the draft report is widely considered by my peers and I to be disappointing both in its objectivity, and in the quality of its contribution towards advancing the important issue of pest animal management in NSW. A disinterested observer could well see it as a very thinly disguised grab for cash by LLS and CRC interests.

The CRC and their ilk have been endeavouring to elevate the level of concern relating to wild deer for at least 10 years. The proceedings from the national feral deer management workshop held in Canberra in November 2005 document essentially the same narrative. The draft NRC report is, in many ways, a continuation of that agenda. Lots of talk and taxpayer funds later, not much has changed on the ground.

As an ex RLPB Director, I understand firsthand the level of discontent that will arise should the funding proposals in the report be enacted. There was considerable objection when RLPB rates were levied on holdings of >10Ha. To take that threshold down to >2Ha would be political suicide. Regardless, if it truly is “shared problems, shared solutions” why should rural residents carry the cost burden? Any initiatives emanating from the draft report should be centrally funded so that the cost burden is shared equally by all tax payers, just as the public benefit is.

The report appears to stray from the terms of reference, for example;

- By failing to compare and contrast the impacts of ALL pest species, how can NSW maximise the benefit per dollar invested?
- By failing to explore ALL potential approaches towards better community engagement on pest animal issues, and going straight to the preferred “solution” of paid pest animal co-ordinators inside LLS. Jobs for the boys?
- By ignoring policy barriers and red tape issues which work against effective and efficient pest animal management at the coal face, for example much of the unnecessary and ideology driven regulation around firearm ownership and use, suppressors, etc.
- By not seeking examples of good practice that works outside NSW, and conveniently overlooking current examples which, if included, would cast doubt on the recommendations (e.g. the current pest listing of deer in Qld and SA, both of whom continue to experience the same general issues as are present in NSW, and steps being taken towards wild harvest game meat processing in the NT).

- By introducing the concepts of biosecurity and biodiversity which were out of scope for the TOR. It has been suggested that for many in the conservation sphere it has been self-evident that introduced species are a biosecurity issue and entirely detrimental to biodiversity. However, that fundamentalist thinking has been challenged in papers to prestigious journals like Nature and Science in recent years, arguing for a more pragmatic approach, recognising that introduced species actually might contribute to biodiversity, especially in environments highly modified by humans and no longer suitable for many native species.

Many of the claims made simply repeat tired old rhetoric, and fail to establish as fact many of the claims and assertions put forward. This is simply unacceptable as a basis upon which to develop public policy and to commit taxpayer funds.

The report is internally inconsistent in its logic and its recommendations. For example;

- Recognising the cultural significance of wild horses without also recognising the cultural significance of wild deer can only suggest a failure to understand the brief, or a deliberate attempt to placate one interest group for political reasons, whilst dismissing the claims of others.
- Stating in section 7.3 that;

*“Control of pest birds is difficult due to the widespread and erratic distribution of introduced birds, a lack of technically feasible control techniques, the absence of specific legislation or policy direction for bird management and the lack of both reliable data and scientific research”*

Clearly this statement also applies to wild deer.

- Applying selective evidence to justify “best practice” control methods, e.g. accepting protocols and codes of practice which exclude helicopter based shooting of wild horses, and not applying that same rational to equivalent species, such as wild deer.
- Accepting the triple bottom line benefits derived from trout fishing, yet ignoring that triple bottom line effect for wild deer.
- Excluding native animals from scope, and then recommending that markets be developed for kangaroos (recommendation 25).
- Acknowledging in section 1.1 that data gaps exist in some important areas, yet in recommendation 26 seeking to make taxpayer funds available to the successor of the CRC to explore potential control techniques for problems which facts may well prove to be over stated. All available funding should be prioritised towards quantifying and qualifying the problem before tasking publically funded think tanks to seek out unorthodox solutions.

The draft report allocates many column inches to the costs currently incurred by Government and private landholders in combatting “pests”. This assumes some relationship between cost and effectiveness. Clearly, the whole approach has failed us and needs revisiting. Failing to do

that is the equivalent to a fat lady spending a fortune on active wear and then bemoaning her inability to lose weight whilst laying on the lounge eating pizza.

One point which became obvious during the public meetings was that many landholders are ignorant of the provisions already available to them to legally manage wild deer on their properties, yet the draft report fails to mention an awareness campaign in its recommendations. A deliberate omission, or a desire to down play alternative approaches like the DPI GLU model?

Recommendation 23 advocates the abolition of the NSW GLU G license, when the public meetings clearly identified illegal hunting as a major issue. It must have been clear that the revenue from the G license underpins a large part of the budget for GLU enforcement activities. Assuming this foregone revenue is not replaced from other means, this recommendation must also cause doubt around the ingoing viability of public land hunting in NSW.

The SSAA NSW Sydney centric head office view is not well supported amongst rank and file shooters, including many SSAA members. Alienating 180,000 NSW firearm owners with rec hunting firearm licenses is not my idea of a good way to build community engagement.

Recommendations 2 and 12 put forward the idea that the LLS should be the lead agency for established pest populations. The LLS suffer from a very low nett promoter score amongst private land holders, and would appear to be biased towards public land managers. To quote the May 2016 Customer Satisfaction survey results;

*“Areas for improvement in LLS values include enhancing the perception that it delivers good value services, is accountable, alert customers to new ideas and offers new ways of doing things. These aspects are of high importance to private land managers and currently LLS is scoring lower than the average for all the values measured.”*

In terms of new ideas, the draft report acknowledges in section 2.2.4. that “best practice” for community facilitation and evaluation has not been advanced since 1984. Even then, best practice only engaged 739/6000 landholders, (12.3%). Hardly an inspiring figure to base a future strategy around.

Before LLS can even be considered for the role of lead agency, an independent needs and capability assessment should be carried out, and plans to close the skills gaps identified be developed and costed, given that Bryant first observed back in 1984 that “*officers employed to coordinate control programs needed to be more highly trained and skilled in advisory services for landholders*” and the absence of any statement to explain why that situation has changed since then.

In short, when enthusiastic amateurs such as I can see through the recommendations in the draft report, there can be no doubt that the report should be considered with great caution within Government.

Regards,

David Voss.