

## Introduction

Recreational hunting is a viable and cost effective means of controlling feral animal populations that is largely being underutilised due to political motives and misinformed public debate surrounding animal welfare.

The NRC draft report published in March 2016 grossly undermines the value of recreational hunting in the management of feral animals, particularly deer, whilst “failed” and questionable projects, such as the volunteer pest control program operated between National Parks and Wildlife Services and the SSAA are incorrectly heralded as the best thing since sliced bread.

The successful State Forests public hunting model should be expanded into appropriate State Forests and National Parks before the NRC deems recreational hunting as ineffective, or not as effective, as other control methods.

Further, the recreational hunting of game birds should be expanded under the current licensing arrangement, rather than a new restrictive license.

Expansion of the bow hunting for carp program.

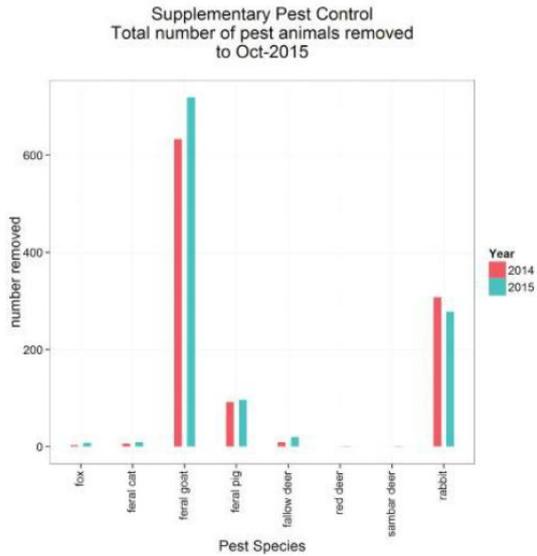
## Supplementary Pest Control Program (SPC)

This program design is deeply flawed as it can't differentiate between SPC and non-SPC pest management<sup>1</sup>. This is fundamental because it's entire raison d'être is pest management and if it can't provide accountability then why should it be maintained?

Considering the pests animals removed, the small number and high concentration of pest species makes its impact abysmal for the price tag as the graph shows below.

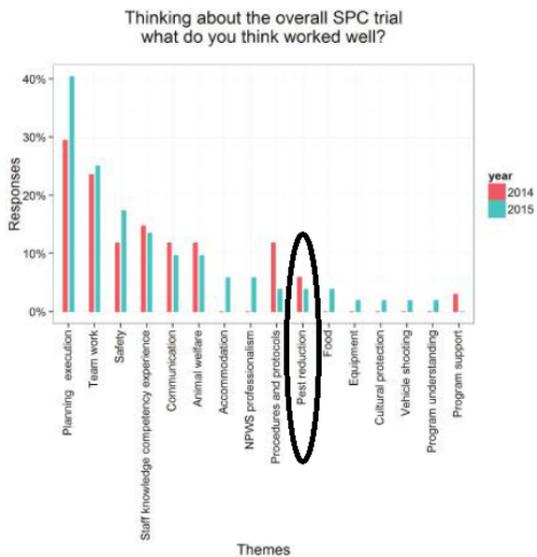
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<sup>1</sup> Natural Resources Commission, *Supplementary Pest Control Trial Interim Evaluation*, 2016, Page 3.



Source: <http://ssaansw.uberflip.com/i/607896-nsw-shooter-quarterly-review-december-2015>

Finally, according to results from surveying Volunteers involved in the program, less than 10% of them believed that it had worked well in terms of pest reduction. Hence attempts by the commission to hail it as an ongoing success is highly suspect. This program should be scrapped.



Source: <http://ssaansw.uberflip.com/i/607896-nsw-shooter-quarterly-review-december-2015>

## Draft Report

The draft report makes a number of unsubstantiated statements, the main ones are listed below:

**Statement:** “The declaration of a species as a pest by the state government is an effective mechanism for raising community awareness and shifting attitudes towards the management of that species.” Page 71.

**Question/Position:** The NRC provide no reference or scientific evidence in support of this statement. It is misleading and it is disingenuous to formulate public policy on unsubstituted claims.

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**Statement:** Recommendation 15(i) suggests that in order to improve enforcement and compliance for pest animals through consistent and streamlined regulation, the NSW Government should develop mandatory pest control practices under NSW Biosecurity Act 2015. Page 72.

**Question:** The Game and Feral Animal Control Act 2002 effectively does this already. Landowners, particularly farmers, and recreational hunters enter into private agreements on a regular basis. This recommendation would increase the red tape regulation surrounding recreational hunting and potentially force certain landowners to control feral animals.

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**Statement:** “Recreational hunting is the method used to control deer in 90 percent of cases, an approach that is both inconsistent and inadequate (Braysher, 2013).” Page 73.

**Question/Position:** A heavily regulated and apprehensive form of recreational public land hunting is used to control deer populations. In order to effectively comment and provide guidance on the value of recreational hunting of deer in NSW, said hunting needs to be greatly expanded.

Further, it appears as though the publication the NRC are relying on in making this statement is from Dr Mike Braysher’s assessment of fox control in Tasmania, nothing to do with recreational hunting of deer in NSW.

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**Statement:** “However, the use of recreational hunting as the primary population control measure for deer is ineffective.” Page 74.

**Question/Position:** Again, this is a pretty broad statement to make in the absence of reference and scientific evidence. Further, the current restrictive model of public land hunting is the major contributor to the ineffectiveness of any recreational hunting, not the hunting itself.

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**Statement:** Box 7.9: Bounty system. Page 96.

**Question/Position:** Despite the fact that the NRC admits that they received several submissions calling for the introduction of a bounty system on feral animals they have rejected this sound and reasonable proposition by choosing to rely on data from Victoria from 2003.

A bounty of any feral animal population should be seriously considered and implemented immediately. The Government is just too lazy and scared to do so.

With extension to the deadline to 30 May, I wish to include the following supplementary comments to my submission (case number 8231002).

First off I am a member of the Sydney branch of the Sporting Shooters Association of Australia and I would like to state that I wasn't consulted by the SSAA prior to their submission on the draft report. I do not agree or support the contents of their submission and they do not speak on my behalf.

Plus I have additional remarks to make on the following recommendations of the draft report

**1. NRC Recommendation 5: That the regulation of non-indigenous species is commensurate with the risks they pose.**

I don't agree with this recommendation. These species need to be dealt with under the NSW Non-Indigenous regulation 2012 where they are placed under category 4 because they are unlikely to present a threat to the environment or agriculture. Undermining these regulations serves no purpose.

**2. NRC Recommendation 16: Manage deer as a pest animal.**

I don't agree with this recommendation and think it is totally unjustifiable. Declaring them as pests won't guarantee any improved outcomes especially for private land holders when the deer are not adequately controlled on public lands. In fact this will create a legal obligation on private landholders to control the deer that come from adjacent public land with no support from government. Just look at Queensland where the pest declaration has not resulted in improved deer management outcomes<sup>i</sup>

Furthermore there are existing arrangements that enable private landholders to effectively control wild deer on their land but it appears that they are not aware or fully understand them.

**3. NRC Recommendation 22: Actively engage recreational hunting groups in regional pest animal management.**

I do support this recommendation and I believe that currently recreational hunters are underutilised. There should be more effort to encourage the engagement of recreational hunters with both public land managers and private landholders.

The Native Game Bird Management Program<sup>ii</sup> that is coordinated and run by the Department of Primary Industries is an example of how recreational hunters engaging with farmers can be utilized as a strategic resource at no further cost to the farmer. There is no reason that this can't be expanded to enable the controlling of deer.

In addition the National Parks and wildlife service should get rid of the politics and institutional bias and actively involve recreational hunters. After all appropriately licenced recreational hunters have been successfully controlling feral pests in State Forests for a decade with no incidents.

Infact the contribution of recreational hunters in the achievement of NSW Biosecurity strategy is recognised by the Local Land Services<sup>iii</sup>



**4. NRC Recommendation 23: Reduce red tape surrounding recreational hunting on private land.**

I disagree with this recommendation. That red tape relates to training and accreditation. The training ensures that hunters comply with code of practice which underpins safety and covers everything from the handling of the firearm in the field to when it is appropriate to take a safe shot. It also ensures that animal welfare is of paramount importance to the hunter. Now removing this red tape will create loop holes which will undermine safety and animal welfare.

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<sup>i</sup> <http://www.brisbanetimes.com.au/queensland/more-feral-deer-to-be-caught-up-in-urban-warfare-20150326-1m8qlf.html>

<sup>ii</sup> <http://www.dpi.nsw.gov.au/hunting/game-and-pests/native-game-birds>

<sup>iii</sup> <http://www.ils.nsw.gov.au/biosecurity/pest-control/hunting>

<sup>iv</sup> <http://www.tendersonline.com.au/TenderDetails.aspx?uid=cctol278341>