

SUBMISSION TO NATURAL RESOURCES COMMISSION

COMMENTS ON THE REVIEW OF PEST ANIMAL MANAGEMENT – DRAFT REPORT

Commissioner,

DEER MANAGEMENT – SUPPORTED, WITH RESERVATIONS

I have over 40 years of experience of managing populations of wild deer in both the UK and Australia and hold a Certificate in Game Management from the University of Queensland. **Something new needs to be done to manage wild deer* because what we are all doing now is clearly not working.**

(*I dislike the emotive term “feral”, too easily applied to both animals and people. Deer were present in NSW at least 50 years before Federation, they are “wild”).

“Deer have increased 30% over a five year period to 2010” – my direct personal experience is that a mere 30% increase over 5 years would pass largely un-noticed on the sparsely-populated and well-wooded landscape of eastern NSW. The real growth rate for populations of Fallow deer, the most common species in NSW, is likely to be of the order of 20-30% *PER YEAR*, implying a 10-fold increase in numbers each decade. To illustrate: 1990 (the original releases from uneconomic deer farms) – 10 deer, by 2000 – 100 deer, by 2010 – 1000 deer, by 2020 – 10,000 deer.

My recommendation: That the Commission review the scientific evidence for the claim of “30% increase over 5 years”, and seek the advice of qualified game management biologists with a view to revising it to a more realistic evidence-based figure.

Hot Spots – the draft report identifies four main wild deer hotspots requiring urgent attention: Upper Hunter/Northern Tablelands, Mid-north Coast, Illawarra/South Coast, and The Snowy Mountains. The Commissioner will be aware that there were over 18,000 NSW citizens licenced by the State Government to hunt deer on public land in May 2016 (source: DPI Game Licencing Unit). Why then are these citizens denied hunting access to wide areas of these very hotspots, especially the Illawarra/South Coast and Snowy Mountains, primarily by the NPWS?

My recommendation – That the entire National Park estate in these hot spots be opened to recreational deer hunting immediately, without further prevarication by NPWS, subject only to the public safety criteria already established for other NSW public land by the DPI Game Licencing Unit.

Restriction on deer control under the Game & Feral Animal Control Act 2002 – It is asserted that “these restrictions support deer as a recreational hunting resource”. Closed seasons for Fallow, Red & Wapiti deer were placed into the Act, as correctly stated on the DPI website today, because they “have specific times of the year when they breed. Hunting at these times is restricted due to an increased likelihood of animal welfare concerns.”

<http://www.dpi.nsw.gov.au/hunting/rules-and-regulations>

Virtually all adult females of these species produce young in November/December and conceal them until mid-February. Is it to be NSW Government policy to destroy lactating females with dependant young leaving the latter to die of starvation in the bush?

My recommendation – that pest control programmes targeting deer take into account the breeding seasons of female Fallow, Red and Wapiti deer in order to avoid adverse animal welfare outcomes for dependant young.

RECREATIONAL HUNTING RECOMMENDATIONS – NOT SUPPORTED

Overall this part of the draft report makes only minor cosmetic changes to licencing and other programmes with no significant impact on the problems as defined in the report. Recreational hunters already have access to many state forests and to a reducing stock of private land as family contacts with the land literally die out. Programmes to link landowners with recreational hunters like Farmer Assist, ineffective and irrelevant to date, can only be to the good but they are unlikely to change rural attitudes which are still based on personal relationships between landowner and hunter.

Regional pest animal management strategy documents *ad nauseum* have included deer and other pest animals for many years. For example, see ee page 41 and table 5 of the Draft Hunter Regional Pest Management Strategy Part B: 2012-2015

<http://www.environment.nsw.gov.au/resources/pestsweeds/110892draftHunterRPMS.pdf>

However, in the absence of serious government investment to implement these plans they will continue to fail to address the problem adequately for lack of funding. The writing of 83 page strategy documents is not a substitute for boots on the ground – an under-funded Parks organisation will never have nearly enough of them to effectively carry out their plans.

Most importantly, there is no mention here of any concrete recommendations to use the massive free resource of over 18,000 licenced recreational hunters to address the core problem identified in the report: the explosion of the deer population on public land and especially National Park estate in the Hot Spot areas of the eastern seaboard.

The Victorian Government actively encourages recreational hunters from both NSW and Victoria to hunt deer in the Alpine National Park and many other National Parks south of the Murray River, the NSW Government forbids it north of that river. Same deer, same terrain, same hunters, just different attitudes.

My recommendation – That the entire National Park estate in these Hot Spots be opened to recreational deer hunting immediately, without further prevarication by NPWS, subject only to the reasonable public safety criteria already established for other NSW public land and administered by the DPI Game Licencing Unit.

SUPPLEMENTARY PEST CONTROL TRIAL NTERIM EVALUATION - REJECTED

This programme is included in the draft recommendations “Continued access for volunteer shooters to national parks through the Supplementary Pest Control Trial”. The Commission website today further claims “Early positive results from trialling volunteer pest control in national parks”.

The SPC programme is a sham. It was rejected from inception by all the main-stream recreational hunting organisations of NSW as counter to their historic hunting culture, family traditions and hunting ethics. It was taken up only by the SSAA who, at that time, run rifle ranges and target shooting competitions and who had a minimal presence in recreational hunting prior to the SPC trial.

The trial was designed by NPWS to support the claim of the discredited O’Farrell government, surprisingly repeated here in the NRC draft recommendations, that there actually exists “Continued access for volunteer shooters to national parks”. There is clearly not and cannot be under the SPC:

| | Supplementary Pest Control Programme | Actual situation |
|---|--|---|
| 1 | <u>Access to parks</u> “Continued access for volunteer shooters to national parks”. | <ul style="list-style-type: none"> • NSW R-Licensed recreational hunters at MAY16: 18,000 • Volunteer shooters active in SPC: <100 • Involvement: 0.05% • Exclusion rate: 99.95% |
| 2 | <u>Ecological outcomes</u> “Targets 12 reserves in <u>western</u> NSW totalling nearly 500,000 hectares” | <ul style="list-style-type: none"> • “Ecological outcomes from the program are uncertain” - None found. • the Hot Spots identified in NRC report are all located in <u>eastern</u> NSW • Specific Impact on Hot Spots: - Nil |
| 3 | <u>Pest control outcomes</u> “2846 target pest animals taken FEB14-JUN15” | <ul style="list-style-type: none"> • Results are insignificant relative to the effort and costs: <ul style="list-style-type: none"> ○ Goats 55%, (1565) “no impact” ○ Rabbits 31% (882) ○ Pigs 11% (313) • No deer, no foxes, no cats, no horses. Impact on critical species listed by NRC - Nil |
| 4 | <u>Viability</u> “Program costs to 30 June 2015 are \$3.63 million” | <p>\$3,630,000/2846 pests = \$1275 per animal!</p> <ul style="list-style-type: none"> • Similar to the real NPWS costs of the failed Deer Management Plan in the Royal National Park and elsewhere. • This level of expenditure is clearly unsustainable outside the trial. |
| 5 | <u>Scaleability</u> Can the SPC be extended 1000-fold to meet the challenges of the Hot Spots? | <ul style="list-style-type: none"> • No fiscally responsible government would fund the extension of the SPC trial to the scale required. • The pest control objectives of the trial can be upscaled at zero cost by providing reasonable access for all 18000 licenced recreational hunters |

The SPC trial has been outstandingly successful in its primary purpose, delaying indefinitely the implementation in NSW National Parks of the existing and successful programmes for access to public land by recreational hunters already operating in both NSW and Victoria. The SPC is about

preventing recreational hunting access to NSW National Parks on doctrinal grounds, it is not about encouraging the use of recreation hunters to supplement pest control measures.

My recommendation – That the entire National Park estate in these Hot Spots be opened to recreational hunting immediately, without further prevarication by NPWS, subject only to the reasonable public safety criteria already established for other NSW public land and administered by the DPI Game Licencing Unit.

Roger Thornback

21MAY16