

Natural Resources Commission  
GPO BOX 5341  
Sydney NSW 2001  
By e-mail to [nrc@nrc.nsw.gov.au](mailto:nrc@nrc.nsw.gov.au)

**Re. Recreational Hunting. Pest Animal Management Review. Draft Report**

The Rural Hunters Association (RHA), representing the memberships of the South Coast Hunters Club and the Snowy Mountains Conservation Hunters Inc., is pleased to provide the following submission, regarding the Natural Resources Commission's draft report on the role of Recreational Hunting in the current Pest Animal Management Review.

Like all responsible hunting clubs and organisations in the state of NSW, RHA has ongoing concerns that recreational hunters are an undervalued and under-utilised resource in the management of vertebrate pest species. While we don't see recreational hunters as a stand-alone answer to the many problems involved, as a representative group within the community at large, we do have a great deal to offer in terms of practical experience and knowledge. Our capacity to be utilised as another management tool in the burgeoning problems of pest animal control should not be underestimated.

A seminal aim of the RHA is to have recreational hunters recognised, trusted and working on pest management control in their communities in the same way as other volunteer organisations such as the Rural Fire Service or State Emergency Service – just two organisations to which our members already contribute their time and efforts. Accordingly, we offer the following comments on the draft report for consideration.

- *Feral deer should be no longer listed as game.*

Changing the status of deer from game to pest animal won't make any difference to the management of their numbers.

Having them declared a pest brings with it the legal requirement for land holders to continually suppress and control numbers. If they don't, they may be forced to do so by legislation, or have to pay for the animals to be controlled by regulatory authorities.

This hasn't worked for other feral species, so why would we expect it to work for deer?

How would this improve management levels?

Would NPWS be subjected to the same requirements?

It is suggested that deer on private property be returned to their original status as stock. This would allow landholders to manage the animals as they see fit – treating them as a pest species if required or using the animals as a resource to generate another income stream at other times.

NPWS has been doing just that in parts of Western NSW for years. Why should landholders be denied the same opportunities just because the animals happen to be deer instead of goats?

- *'Fair chase' restrictions including a ban on night shooting should be removed.*

'Fair chase' restrictions are part of the personal hunting ethic or code that demands game animals only be taken in a way that provides them with a fair chance of being able to escape. It relates to the recognition and respect for deer as game and comes to us from other hunting cultures and countries where the deer are natural to the environment.

While all responsible hunters accept fair chase hunting as a personal ethic, many also recognise the limitations it imposes on those tasked with controlling deer numbers.

Given the growing need for feral deer control and the impediment fair chase restrictions present in that situation, it makes good sense to remove those restrictions if recreational hunters are to become involved in widespread control efforts, including night shooting.

This should apply to private property only, with the written consent of the landholder required.

On public land 'Fair chase' conditions should still be applied in the interests of public safety, under a credible licencing system enforced by the Police rather than DPI Compliance Officers. Heavy penalties must be applied for infringements.

- *There should be no loss of access for recreational hunters. Access to the target pest animals on private land should be further improved.*

Many recreational hunters have difficulty accessing private property for hunting, especially those from city and urban areas who lack the necessary landholder contacts.

There are also insurance problems which the G and R-licence system currently in place, has helped to address. Insurance remains as a significant financial issue for many small clubs, usually addressed by insisting their members have an R-licence or are members of other larger clubs and organisations that have public liability insurance policies in place.

Access to target pest animals has recently been addressed by the introduction of programmes such as Farmer Assist, but more needs to be done to improve the situation.

The introduction of a compulsory and credible hunter education programme needs to be considered as an essential and integral part of involving recreational hunters in broad scale pest animal management programmes on both private and public land.

Of necessity, such training would include practical firearms training, humane harvesting techniques and navigation competencies.

Additionally, more opportunities need to be made available for appropriately trained and qualified recreational hunters to access public land.

Hunting in State Forests has proved itself to be an effective and worthwhile management tool.

The system now needs to be expanded to include National Parks wherever possible.

NPWS estate acts as a reservoir for deer in many parts of the State and current levels of control being undertaken by NPWS staff DO NOT adequately address the problems.

Nor are they cost effective when there are volunteers capable of doing the work for no more than supervision costs

- *Recreational hunters will no longer require a licence to target deer on private land, reducing costs and red tape.*

This proposal is an important step for involving more hunters in deer control programmes. The current requirement to hold a G-licence to hunt deer on private property has long been an impediment to deer management.

Many hunters and landholders see it as being little more than a revenue raising exercise, though it does supply an insurance advantage. A licence for hunting deer or any other pest species on private property should not be required.

Credible training, a current Shooters Licence and written consent to access private property from the land holder are essential.

- *The management of feral deer should be included with other pest animals into regional pest animal management plans.*

The management of feral deer should be equally applied across all regional land tenures, including National Parks, where, despite the best of intentions, efforts are mostly seen as inadequate and inefficient when compared to other land tenures.

To be fair, funding for pest management in NPWS is often limited and there are priority species such as wild dogs.

That said, recreational hunters have the capacity to extend and intensify a wide range of pest animal programmes at little cost to management authorities or the public purse.

- *Recreational hunters should be invited to be involved in regional pest animal planning and in delivering regional pest animal programs.*

Recreational hunters have a broad range of practical experience and knowledge with and about deer. All responsible hunting clubs and organisations would relish the opportunity to be involved in the planning and implementation of pest animal programs as a public service to their respective communities.

Apart from the costs of training, funding requirements would be minimal.

If required, training could also include the collection of biological data to improve understanding of the deer and how they impact the various land tenures with the long term aim of providing more comprehensive management planning.

If regional pest management programs are to succeed, a “no borders” approach needs to be adopted to ensure the issues are addressed holistically, not on a piece meal basis as has been the norm in the past

- *Increased support for programs that link landholders with recreational hunters.*

These programs exist but need to be enlarged to involve more hunting clubs and organisations. Again the need for appropriate, recognised training programs need to be pursued to ensure the competencies involved are of a professional standard, to maximise the humane demise of target species. This is important, not just for the peace of mind of landholders, but would go a long way towards debunking the negative images that Green groups and some of the media routinely attribute to hunters.

- *Continued access for recreational hunters to selected State Forests and continued access to volunteer shooters to national parks through the Supplementary Pest Control Trial.*

As noted previously, recreational hunting in State Forests by approved hunters has been a major boon to the control of deer and other pest species in those areas.

Logically, it should be extended to include selected National Parks to increase not just the sweep and efficiency of the management programs but to involve more recreational hunters on a managed basis.

If this Pest Animal management review is to be seen as a credible process, then all the options available need to be assessed honestly.

Cultural change is required on a number of fronts.

That comments from recreational hunting groups have been asked for is a great start.

That said, the lock it up and leave it approach traditionally applied by NPWS to public land needs to be scrutinised carefully.

So do the politics of “Conservation” in NSW – especially the shaped- to -suit scare mongering tactics of the extreme Green and Animal Liberation groups.

These must all be laid aside so the planning process can evolve in the most practical and productive way possible, devoid of the emotional clap trap that is the stock in trade of the anti-hunting lobby.

That hasn’t happened in the past and if it doesn’t change then the pest animal problems in NSW will continue unabated.

John Dunn  
President, Rural Hunters Association

Dan Field  
President, South Coast Hunters Club

Geoff Levey  
President, Snowy Mountains Conservation Hunters Inc.