

Submission

to the

NSW Natural Resource Commission

Pest Animal Management Review

Draft Report March 2016

Stephen Larsson

Introduction

On Thursday 31 March 2016 the NSW Natural Resources Commission issued a media release announcing the release of the Commission’s draft report: *Shared Problem, Shared Solutions: Pest Animal Management Review, Draft Report March 2016*.

The terms of reference guiding the preparation of the report, issued by the Premier of NSW in September 2015, broadly required the NRC to “review the management of pest animals in NSW” with the purpose “to identify opportunities to improve the management of pest animals in NSW across all land tenures for environmental, economic and social benefits.”

The Commission was *inter alia* tasked to investigate and identify the quality of the evidence base and processes supporting prioritisation decisions.

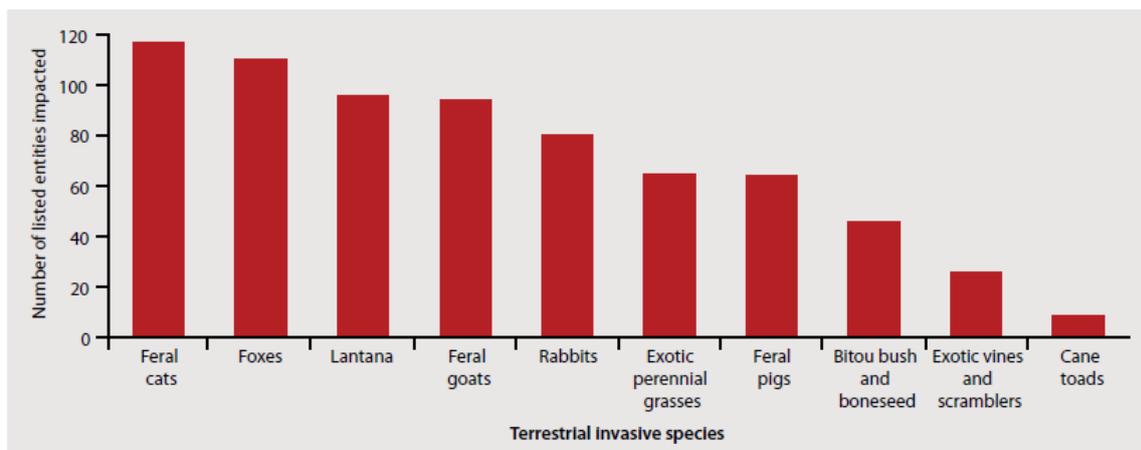
The issues paper issued by the Commission stated: “The review will be consultative and evidence-based.”

Comments

The Commissions draft report and accompanying documents indicate that either the Commission or the Advisory Committee convened to steer the review, have an inordinate interest with deer and game birds, which I suspect is due, in part, to the former positions held by committee members.

My view is supported by the following figure from Chapter 7 of the NSW State of the Environment 2009 report which shows that neither deer nor game birds are ranked in the top environmental threats in NSW.

Numbers of NSW species, populations and ecological communities threatened by selected terrestrial invasive species



Source: Modified from Coutts-Smith & Downey 2006

Notes: The threatened species, populations and ecological communities are those listed under the TSC Act.

The invasive species selected are generally those listed as key threatening processes.

Data was compiled by aggregating the threats affecting each threatened species, identified at the time of listing, across all threatened species.

Fact Sheets

The NSW Natural Resources Commission published a series of 'fact' sheets to complement the draft report. A number of claims and statements in the fact sheets are merely opinion, are not based on the best available evidence, perpetuate anti-hunting myths and mislead the reader.

Deer management fact sheet

Claim: "Recreational hunting is generally only effective as a pest management technique when part of an integrated pest control program."

There is no evidence presented by the Commission that hunting is *only* effective when it is part of an integrated pest control program.

Claim: "As a game animal there are also no mechanisms available to compel landholders to control deer on their land where this may be required to meet control objectives."

It is disingenuous of the Commission to make this claim, then later in the report state: *"In addition to the general biosecurity duty, the Biosecurity Act 2015 includes a range of tools for the management of biosecurity threats and risks, including emerging and widespread pests. Further explanation of these tools is provided in Table A3.1."*¹

Recreational hunting fact sheet

Claim: "Recreational hunting alone is not effective in controlling pest animal numbers..."
ISC Fact sheet: **"...hunting is ineffective..."**²

Conclusion: The Commission has clearly chosen to accept at face value the anti-hunting dogma of the Invasive Species Council and re-iterate this without seeking any independent evidence to assess the veracity of their claims. It is of great concern, the Commission, a NSW government agency, has chosen to repeat unsubstantiated comments from the Invasive Species Council fact sheet 'Recreational hunting NSW: Claims v Facts'.

¹ Page 2, Attachment 3, Shared Problem, Shared Solutions, Draft report March 2016.

² Recreational hunting NSW: Claims v Facts. http://invasives.org.au/files/2014/02/fs_rechunt_NSWvfacts.pdf

Selective use of Literature

The Commission has been selective in its citation of the published literature, especially in relation to deer. In doing so, it has overlooked important information that would have been helpful in informing its recommendations in the draft report.

For example, the draft report makes no reference to the National Feral Deer Management Workshop in held in Canberra on 9 and 10 November 2005. The workshop brought together a broad range of stakeholders from around the country to openly discuss their goals for the management of deer in Australia (McLeod 2009).

In addition to providing valuable insights from a range of stakeholders, the workshop concluded that the lack of fundamental knowledge of the ecology and impacts of wild deer in Australia is one of a number of factors obstructing the effective and targeted management of these species (Table 1). The workshop proceedings noted that information on the movement, ecology, population dynamics and the relationship between deer density and impacts are scant, yet essential for effective management of deer species.

Table 1: The estimated scientific knowledge of the ecology of wild deer species in Australia

Deer Species	Home Range	Habitat Use	Life Cycle	Population Dynamics	Distribution and Abundance	Behaviour	Impact
Fallow	2	2	3	2	2	2	2
Red	1	1	2	2	2	2	1
Sambar	1	2	2	1	2	3	2
Rusa	3	3	3	3	2	2	2
Chital	1	1	2	1	2	1	1
Hog	1	2	3	3	2	3	1

Source: McLeod 2009

Conclusion: The Commission has missed an important opportunity to incorporate the findings from this vital workshop into informing its recommendations in the draft report. As a consequence, the recommendations cannot claim to be based on 'best available' information.

Summary of Submissions

The Commission's summary of stakeholder submissions (Draft report, Attachment 2) asserts that "a notable number" of the 176 on-line and written submissions suggested there is a "pressing need" for deer to be transitioned from game status to pest status.

My review of on-line and written submissions to the discussion paper, not including any submissions generated by the Invasive Species Council's on-line campaign (Appendix A) reveals only four submissions alluded to such a suggestion:

[Aaron Burke](#)
[Invasive Species Council](#)
[Sporting Shooters Association of Australia NSW Inc](#)
[Ted Rowley and Jo Roberts](#)

I disagree with the Commission's assertion that four submissions (2.2% of 176) constitute "a notable number" of the written and on-line submissions received.

Conclusion: The Commission has placed undue weight to the views of a small number of submissions regarding deer. It is similarly perplexing that the "many submissions" which suggested that NSW National Parks and Wildlife Service are failing to control pests properly, and that their lands are breeding grounds and refuges for pests, did not receive proportionate consideration and warrant a specific recommendation.

Closing Comment

In my view, the review appears to have been consultative but undue weight has been assigned to a small number of submissions regarding deer and game birds. The quality of the evidence and literature cited in the draft report, and used to inform the Commission's recommendations, lacks rigour and leaves much to be desired.

References

Invasive Species Council. *Time to declare feral deer a pest in NSW* campaign (Appendix A)
<http://invasives.org.au/blog/time-to-declare-feral-deer-a-pest-in-nsw/>

McLeod, S (2009). '*Proceedings of the National Feral Deer Management Workshop*', Canberra, November 2005, Invasive Animals Cooperative Research Centre, Canberra.
<http://www.pestsmart.org.au/proceedings-of-the-national-feral-deer-management-workshop/>

NSW Department of Environment, Climate Change and Water (2009). *State of the Environment 2009* report. <http://www.epa.nsw.gov.au/soe/soe2009/index.htm>

Appendix A: Invasive Species Council's on-line call for submissions



**KEEPING NATURE SAFE FROM WEEDS,
FERAL ANIMALS AND OTHER INVADERS**

invasive
species council

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Time to declare feral deer a pest in NSW

Posted on 20 April, 2016 by  [John Sampson](#) in  [Blog](#),  [feral animal control](#),  [NSW](#)



Feral deer are out of control in NSW, and have been declared the state's 'most important emerging pest animal threat'.

For years their numbers have been allowed to grow, and now we're suffering the consequences – they are a major environmental threat to Australia's oldest national park, the Royal, and are becoming a menace on our roads – in the Illawarra region feral deer have caused nine fatalities in a seven year period and 100 collisions with trains.

What you can do

In March 2016 an independent review recommended NSW make deer a pest species. Currently they are protected as a game species, and managed as a hunting resource.

Making feral deer a pest species would give land managers and governments the power to tackle this growing environmental and agricultural threat head on, rather than being constrained by current laws that protect feral deer.

Make a submission

The NSW Government wants to hear from you on this issue. **Just make a simple submission to the Natural Resources Commission pest animal management review using our submission form below** endorsing its recommendation to declare feral deer a pest species in NSW.

The NSW Government will decide whether to implement the recommendations after it has received the final report in June 2016. If you would like to include more detail in your submission please download and read our [submission guide](#). You can also get the draft report on the [commission's website](#).

This is a once-in-a-generation chance to tackle the growing feral deer threat.

Name *

First

Last

Your email *

Your address

Street Address

City

State / Territory

Postcode

Country

Optional, but including your address, especially your state, will increase the chance of a reply.

Email heading *

This will become the subject line of the email sent on your behalf. You can change this if you want.

Your comments

Please add your own words about why you believe deer should be declared a pest species in NSW

Email message *

I support 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.

I also support the following points jointly promoted by conservation groups Invasive Species Council, Nature Conservation Council and the National Parks Association of NSW:

This submission will be sent on your behalf to the NSW Natural Resources Commission. In the Your Comments field please add in your own words why you believe deer should be declared a pest species in NSW. You can of course keep or delete our key recommendations as part of your submission.

Would you like to join our mailing list?

Sure thing! Sign me up.

[Send my email](#)

Email message field above reads:

I support 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.

I also support the following points jointly promoted by conservation groups Invasive Species Council, Nature Conservation Council and the National Parks Association of NSW:

- Pest declaration for feral deer and cats and a statewide feral deer containment plan.
- Mandatory cat desexing and designation of areas requiring cat containment.
- Remove game status of deer and invasive exotic birds.
- Aerial and ground shooting of feral horses under RSPCA endorsed protocols.
- More emphasis on prevention, surveillance and early eradication.
- More resources for strategic pest control and research including research for novel approaches such as rewilding.
- Stronger controls on keeping invasive pet birds and compliance for illegal pet collecting.
- Act to prevent the spread of aquatic pests such as carp and tilapia and preventing new escaped aquarium fish.
- Oppose commercialisation of feral animals due to the unintended consequences of assisting their spread.
- Retain dingo conservation areas inside national parks under the Biosecurity Act.

Source: <http://invasives.org.au/blog/time-to-declare-feral-deer-a-pest-in-nsw/>

[REDACTED]

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Sydney NSW 2001

With extension of the deadline to 30 May 2016, I wish to include the following supplementary comments to my submission to the Commission's draft report: *Shared Problems, Shared Solutions*.

1. I am a long-time member of the Sydney Branch of the Sporting Shooters Association of Australia (SSAA).
2. I was not consulted by the SSAA prior to their submission on the draft report being lodged.
3. The SSAA does not speak on my behalf, nor represent my views on the draft report.
4. I strongly disagree with, and do not support the following statements made in the SSAA (NSW) submission on the draft report:

"The exhibited attitude of members was one of frustration, dissatisfaction and disappointment as they were forced to pay an additional fee for a licence that required no training, no membership of an AHO and was therefore seen as simply revenue raising by the then Game Council (current cost of \$75 per year)."

"There has been considerable ground swell amongst members who believe that as it has been made too difficult and costly to be permitted to hunt deer on private land, deer numbers are not being controlled to the extent they were prior to the declaration of deer as game."

“Members have also expressed a desire to hunt deer all year round, as they do in Victoria (with the exception of Hog deer), and would like to be able to hunt deer at night under spotlight when the animals are more active.”

Stephen Larsson
SSAA Member