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29 April 2016

Dr John Keniry  
Commissioner  
Natural Resources Commission NSW  
Level 6, 52 Martin Place  
Sydney NSW 2000

### **Submission on the Pest Animal Management Review Draft Report March 2016**

*Note: You can publish Ted Rowley's name and our region – Snowy River Shire, Snowy Mountains. Please keep the contact details confidential as we do have an issue with illegal hunters.*

Dear Commissioner

We found the March 2016 draft report for the NSW Pest Animal Management Review to be informative, well-constructed and the recommendations made relevant and comprehensive. We are based on a beef cattle farm in the Snowy River Shire in the Snowy Mountains region.

Overall, there were four issues that we thought were a priority for some further consideration for the final version of the report. These are;

*1. Citizen or community monitoring of pest animals*

It became obvious during our research for preparing a submission to the review that research data or information on distribution, density and impact of some invasive animals (Game or pest) was limited. Information on pest animals such as deer, cats and feral horses was limited especially on private lands.

*We request that citizen or community monitoring such as found with the Platypus Conservancy, Birds Australia and Landcare Groups be given increased focus in the report's recommendations as a mechanism to be promoted and supported by NSW Government Organisations regulatory, research and extension programs and activities. This will help provide better decision making information and be a way of linking Government research, regulatory and extension agencies/bodies with land managers, private or public.*

*2. Game and Feral Animal Control Act 2002 No 64*

The purpose of the Game and Feral Animal Control Act is to: *Manage and regulate the hunting of game; and for other purposes.* The objects of this act are:

- a) To provide for the effective management of introduced species of game animals, and*
- b) To promote responsible and orderly hunting of those game animals on public and private land and of certain pest animals on public land.*

This act is not intended to support the eradication of pest/game animals, support an improvement of productivity of private lands or an improvement in condition of public landscapes. For example, deer are a game animal protected by the 'Game Act' and anecdotal and experiential evidence from public and private land managers during this review process and recent public meetings by the NSW DPI Game Compliance Section clearly show that land managers have information and experiential knowledge that Feral deer populations are rising exponentially and have not been and cannot be controlled through implementation of options under the 'Game Act'.

*We request that further emphasis is given to this baseline evidence in the report and that the argument is profiled that the existing provisions under the 'Game Act' cannot and have not controlled deer populations and this is a primary reason all species of deer should not be listed as game animals.*

### *3. NSW Biosecurity Act 2015*

The 2015 NSW Biosecurity Act is being prepared for implementation with regulations, policies and procedures currently being clarified. This 'Act' is important for providing the right enabling conditions for pest animal management by private and public land managers. It is probable that state wide 'pest listings' may be discontinued under the 2015 Biosecurity Act and the emphasis on 'pest status' for animals be given over to regional pest animal arrangements under the auspices of Local Land Services supported by DPI NSW activities.

*We request that the final Pest Review Report make it explicit that if and when the Biosecurity Act 2015 is implemented that;*

- a. Pest status can be applied to non-indigenous invasive animals at the regional level across private and public lands; and*
- b. Current provisions for game animal management under the Game Management Act are not adopted as a matter of policy or strategy for regional pest animal control plans.*

### *4. Cross tenure or boundary pest animal management policy and strategy*

One of the opportunities in pest plant and animal management is for greater cross tenure or boundary collaboration in developing plans and implementing pest control monitoring and actions. We bait for fox control twice a year, however, our neighbours do not. Our Landcare experience is that when a policy and strategy decision is made that makes public or external assistance to land managers **dependent** on land managers agreeing to work as a group in planning and implementation actions, a more effective and efficient use of that resource occurs. This was the experience with philanthropic investments in landcare e.g. Alcoa Landcare program in Victoria and Western Australia, and with catchment group works e.g. Woody Yaloak Catchment Group of land managers in Victoria, through their 'neighbourhood group' experiences.

*We request that the final Pest Review Report makes an explicit recommendation that public or external assistance (Grants, funds, expertise, monitoring support, LLS Regional or Local plans) to either public or private land managers should be dependent on cross tenure or boundary arrangements being agreed and utilised for planning and implementation. To continue to allocate public funds to individual land managers for isolated actions is not achieving the degree of control needed for pest plants or animals.*

We congratulate the NRC and staff on the conduct of the review and on the quality and comprehensiveness of the draft review report. While we may quibble with the detail of some recommendations here and there, we find ourselves in agreement with the recommendations given the points made above.

Thank you for the opportunity to provide a response. We will be attending the Nowra consultation meeting on May 3 2016.

Yours faithfully



EE (Ted) Rowley



JE Roberts

Snowy Mountains Region