

BY EMAIL  
Pest Animal Review Panel  
Natural Resources Commission  
SYDNEY NSW 2001

27 May 2016

Dear Sirs/Mesdames

### **Submission on Pest Animal Draft Report**

#### **Recommendation 5 i & ii**

While I agree that the regulation of non-indigenous species should be commensurate with the risks that they pose, the Natural Resources Commission should be able to justify why changes are needed, particularly the amendment to the NSW Game and Feral Animal Control Act 2002.

I understand from your Draft Report that *In NSW ferrets are placed in Category 4 under the NSW Non-Indigenous Animals Act 1987 with “animals that would be unlikely to present a threat to the environment, agriculture or persons, or greatly worsen an existing threat if they escaped into the wild, the importation and keeping of which are not restricted”.*

While ferrets have proved to be a problem in other parts of the world it is not clear from your Draft Report that this is actually the case in NSW. In my experience ferret owners are responsible people. **I request that any restriction on their pets or hunting companions should be based on immediately relevant evidence.**

Your Draft Report draws a parallel with non-indigenous game birds; *In NSW they are placed in category 4 as unlikely to present a threat.* Although wild populations do exist, they are regulated under the *NSW Game and Feral Animal Control Act 2002*. It is not at all clear from the Report that the Act is not working to control those populations. **I request that evidence is presented to support the removal of non-indigenous game birds from the 2002 Act.**

### **Recommendation 16 i & ii**

I am especially concerned by the proposal in your Draft Report to give deer the status of a pest animal. I am a member of the Sporting Shooters Association of Australia (SSAA) and the Australian Deer Association (ADA). The SSAA is to be commended for responsible cooperation with government but the executive would do well to consult closely with membership to ensure regulatory capture is avoided. Capture would be to the advantage of neither. In particular I understand that the joint NRC/SSAA deer control program proved to be very expensive on a per head basis. I believe there is actually considerable opposition among responsible NSW hunters to Recommendation 16 i & ii.

I have lived in Western Australia where deer have declared pest status. I understand this is or has also been the case in Queensland. I would have expected some evidence from these States to be provided in support of the likely effectiveness of Recommendation 16 i & ii. However that was not forthcoming. I do not believe such evidence exists.

Deer populations are reasonably well studied and I would expect the current increase can be managed under the existing framework. Fire management is of great importance here. Most States in Australia have fallen behind previously good practice. This is probably the result of more people expecting to visit pristine woodland and not wanting the inconvenience of smoke caused by controlled burns. Regrowth after wildfire has many consequences.

Pest Animal Draft Report did not recommend an education initiative for landowners to allow a better understanding of existing arrangements to control wild deer on their land. I think you will find this is not a well understood area and such an initiative would be well received and effective.

**This recommendation is completely unjustified, will not serve the intended purpose. I request it be abandoned.**

### **Recommendation 23 i & ii**

I mentioned regulatory capture while considering Recommendation 5 although it was not clear in that case who was the subject. Capture is certainly a concern with Recommendation 23 and it is quite clear that hunting clubs are the subject. There is a role for government here and it should step up while keeping red tape to a minimum.

A framework linking hunters with landholders is very worthwhile and mutually beneficial. However removing licence requirements and putting the onus onto hunting clubs is unrealistic. Active game management compliance monitoring is necessary to ensure the *NSW Game and Feral Animal Control Act 2002* and *Regulations* including the *Code of Practice* are adhered to. Unfortunately the *Prevention of Cruelty to Animals Act* may also be breached by irresponsible hunters who may be encouraged into the sport once the requirement for hunters to be licenced is removed.

**This recommendation is unrealistic. I request it be abandoned.**

Yours sincerely

TOM MARSHALL