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Pest Animal Review  
Natural Resources Commission  
PO Box 5341  
SYDNEY NSW 2001

Your Ref:  
Our Ref:  
File:  
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Dear Sir/Madam

**SHARED PROBLEM, SHARED SOLUTIONS PEST ANIMAL MANAGEMENT REVIEW - WOLLONGONG CITY COUNCIL RESPONSE TO DRAFT REPORT**

Please find below Wollongong City Council's response to the draft report of the Natural Resources Commission released for comment in March 2016.

The draft report has been reviewed by Council staff and Council's response has been generated with input from its Environment and Sustainability Reference Group at its meeting of 27 April 2016.

A detailed response is presented below, however, the recommendation for deer to be managed as a pest species is particularly welcomed by Council given our extensive history of dealing with deer as a pest species.

Please contact me should you require further information.

**This letter is authorised by**

**Renee Campbell**  
**Manager Environment Strategy and Planning**  
Wollongong City Council

# Shared Problem, Shared Solutions – Pest Animal Management Review – Draft Report 2016

## Submission in Response - Wollongong City Council

### Introduction

Wollongong City Council has considered the preliminary findings and draft recommendations of the Natural Resource Commission pest management review. The report was distributed amongst staff and several relevant draft recommendations were considered in detail by relevant staff. Council's Environmental Sustainability Reference Group (ESRG) was consulted on the draft report and the feedback of the ESRG in relation to Deer is integrated in our feedback below.

### General Comments

The draft Report is a timely synthesis of the latest information on pest impacts and the best approaches for managing pest animals. Wollongong Council has developed and implemented a holistic approach to pest management over the last 10 years in response to our particular pest management issues. In collaboration with state government agencies, animal welfare groups and Police, Council developed a Vertebrate Pest Animal Management Policy and several Pest Management Plans for Priority Pests in 2010. The policy was recently updated in 2015.

Your principle findings are consistent with the experience of Wollongong Council over the past 10 years :

- Pest animal impacts are significant;
- A nil tenure approach is required to address pest impacts;
- It is very difficult to maintain long-term pest management programs without secure funding from government;
- The success of pest management programs is reliant on strong relationships between government and private land managers
- High quality research is required to develop biological controls that are safe and effective treatments for pest animals in the future.

### Specific Comments

The draft Report makes 30 recommendations across 7 themes. Council broadly supports recommendations 1 – 15 related to proposed improvements to governance, planning and risk management of pest animals. It also broadly supports recommendations 18 – 30 related to improved management and funding of pest animal issues. Recommendations 16 and 17 are discussed in more detail below.

**Recommendation 16:** Manage deer as a pest animal.

The NSW Government should:

- i. Exclude all species of deer from the *NSW Game and Feral Animal Control Act 2002*
- ii. Include all species of feral deer in a regulation addressing pest animals under the *NSW Biosecurity Act 2015*.

**Council supports the draft recommendation 16.** It is an important step forward in acknowledging the pest impacts of deer that the Wollongong community have been experiencing for several decades.

In 2010, Wollongong Council established a Vertebrate Pest Animal Management Policy that nominated wild deer to be a pest in our area. Although the declaration of deer as a pest in the policy did not carry any legislative weight, it was an important step in defining a local approach to deer management that was appropriate for the Wollongong community.

The inclusion of deer as a game species within the *NSW Game and Feral Animal Control Act 2002* was a significant barrier to the establishment of a landscape wide deer management program in the Illawarra. The NSW Game Council lobbied Council for the use of recreational hunters to 'control' deer rather than professional pest management contractors. Although Council was not opposed to the use of volunteer hunters, there was found to be a very low acceptance in the rural community for allowing recreational hunters access to their land and firearms licence restrictions prohibited recreational hunters culling deer in the vicinity of the urban areas most affected by deer.

In May 2011, Cumberland Livestock Health and Pest Authority (now South East Local Land Services) initiated the Northern Illawarra Wild Deer Management Program (NIWDMP) in partnership with council and local land managers. The NIWDMP has now operated for five years in the Illawarra and has grown into the largest deer control program underway in NSW. The declaration of deer as a pest would help secure funding for the NIWDMP and the prioritisation of deer control in NSW.

The NSW Government should acknowledge the pest impacts of deer such as:

- Negative impacts on threatened biodiversity through browsing, trampling and rutting damage;
- car accidents and other traffic hazards;
- accidents and delays on the rail network;
- damage to property, such as residential gardens and fences;
- decreasing agricultural productivity through competitive foraging; and
- indirect impacts from illegal hunting.

**Recommendation 17:** Manage feral cats as a pest animal.

The NSW Government should:

- i. Declare feral cats as a pest by including them in the pest animal regulation being prepared for the *NSW Biosecurity Act 2015*.
- ii. Ensure any mandatory measures are consistent with the model code of practice for the humane control of feral cats
- iii. Prioritise within the *NSW Invasive Species Plan 2015-2022* the management of feral cats in areas of high biodiversity value
- iv. Support continued research into the scale, efficiency, cost-effectiveness, sustainability and risk of cat control methods
- v. Align the Draft *NSW Invasive Species Plan 2015-2022* with the Federal *Feral Cat Threat Abatement Plan*

- vi. Amend the NSW *Companion Animals Act 1998* to provide for:
  - a. The compulsory desexing of all cats by the age of four months if not exempted
  - b. Requiring all owners of entire cats older than four months to be registered as a breeder
  - c. Requiring all entire cats to be registered annually
  - d. Local governments to declare and enforce cat confinement areas
- vii. Partner with RSPCA and other relevant organisations to deliver a targeted education campaign raising the awareness of the risks posed by stray and feral cats and promoting responsible pet ownership.

**Council partially supports draft recommendation 17.** Council supports the management of feral cats as a pest animal. This position is made clear in our Vertebrate Pest Animal Management Policy.

Sub-recommendation vi would require additional resources to be directed to Council for implementation of the recommendation.

Recent impounding statistics indicate that of 1010 cats impounded by Wollongong Council, only 15% were microchipped and only 4% were registered. With this evidence of poor compliance with existing regulations within the *Companion Animals Act 1998*, the introduction of new provisions relating to compulsory desexing and annual registration of breeders would need to be accompanied by a significant increase in resources for local councils to enforce these provisions.

It is suggested that focussing on cats only being sold by registered breeders and approved agencies (including pet shops) and requiring these agencies to only sell desexed cats would prevent new feral cat stock from being introduced into the bushland and from breeding with domestic cats. It would also be a simpler and more effective system of control.

Please note table 6.6 list cat registration as occurring at 4 months in NSW. This should read 6 months.

## Conclusion

The NRC report recommends changes that are largely supported by Council. In particular, the recommendation to manage deer as a pest animal is strongly supported by Council given the significant impact of wild deer on our area.