

Submission to the

Natural Resources Commission of NSW

Review of NSW Pest Animal Management

Issues Paper

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Background

The Federation of Hunting Clubs Inc. (the Federation) is an umbrella organisation of over 30 hunting clubs representing members from all parts of New South Wales. Collectively, our members hold an enormous breadth and depth of practical experience in pest management through: professional qualifications in veterinary science, wildlife management, biological sciences and education among many others; academic appointments at professorial and lecturer positions in universities, and appointments to various government advisory boards including the Game and Pest Management Board, the former Game Council of NSW, and the NSW Animal Welfare Advisory Council.

The Federation is approved by the NSW Commissioner of Police, through the NSW Police Firearms Registry, to operate and conduct firearms related activities and is recognised by the NSW Department of Primary Industries as a stakeholder in hunting, and game and vertebrate pest management matters.

Introduction

The Federation welcomes the opportunity to submit comment on the pest animal management issues paper. As identified in the issues paper pest management in NSW has been examined in many previous government inquiries and public consultations and governments have duly responded to those recommendations. Regrettably however, despite implementation of actions recommended in previous inquiries, it appears that pest animal problem is getting worse.

If there is a *perception* that things are getting worse, then they probably are, and it is incumbent upon the Commissioner for Natural Resources and the Advisory Committee to critically and impartially examine and determine why this is so.

If we are to make any progress in managing pest animals hard decisions will have to be made. For the sake of biodiversity conservation and protection of primary industries in this State, the Federation trusts the draft and final reports by the Commission will not shy away from making the difficult but necessary recommendations to the Premier.

The Commission may not obtain *all* the answers on managing pest animals from this consultation but if we wait until we do, it will be too late for some species. Given the ongoing decline in the status of biodiversity in NSW there is an imperative for urgent and *effective* action.

It is our view that pest animal management in NSW is caught in a perpetual cycle of one step forward followed by two steps backward. In terms of making tangible progress and moving forward, the Federation urges the Commissioner for Natural Resources and the Advisory Committee to consider the following matters.

Misleading Performance Reporting

Government agencies can have a tendency to overstate their effectiveness in managing pest animals. Unfortunately, during election campaigns political parties and candidates try to out-compete each other by making bold and often unrealistic promises and commitments to voters. Once in office, election promises *have* to be delivered and government agencies, mindful of the need to appease their political masters, often produce ‘colourful’ performance reports. For example, the following statements are clearly fanciful.

“As a result of our programs pest animal and weed problems are often less serious in national parks than they are across most other land in NSW.” and

“The recent NSW State of the Parks report also found that in more than 90% of parks across NSW, the problems caused by pest animals and weeds were either being reduced or were unchanged.” (emphasis added)

This type of exaggerated and politicised performance reporting is not helpful if we are to understand the true nature and extent of pest problems and effectiveness of management efforts.

The “recent” *NSW State of the Parks 2007* report referred to above was published 8 years ago and the National Parks and Wildlife Service (NPWS) report *Protecting our national parks from pests and weeds* documenting performance in managing pest and weeds was published in October 2006, 9 years ago¹. These now dated reports raise concerns about the accuracy and currency of information used for decision making.

Accuracy and Currency of Information

The Federation recognises NPWS has enormous task in managing over 800 reserves covering around 8% of the area of NSW. Despite the enormity of the task NPWS is obliged to collect data, monitor and report on performance, and make adjustments as required. The effectiveness of any pest management program relies critically on the ability to measure performance against pre-defined goals.

Unfortunately NPWS has a poor record for measuring its performance in managing pest animals (Table 1) and other areas of responsibility such as historic heritage assets in national parks².

¹ Protecting our national parks from pests and weeds.

<http://www.environment.nsw.gov.au/pestsweeds/SoPPestManagement.htm>

² NPWS has not established statewide outcomes for its historic heritage asset base as a whole. The agency has not identified agency-wide priorities for historic heritage across the park estate or determined which of these assets it can maintain within expected funding. Auditor-General’s Report Performance Audit 2013. Management of historic heritage in national parks and reserves. <http://www.audit.nsw.gov.au/publications/performance-audit-reports/2013-reports/historic-heritage-in-national-parks/management-of-historic-heritage-in-national-parks-and-reserves>

Accurate and timely data are strategic assets for every organisation. Making pest management decisions based on outdated information is risky, wastes resources and potentially has counter-productive impacts.

Agency Capability

In contrast to the exaggerated and politicised performance reports prepared by NPWS true performance measures are thankfully available from performance audit reports prepared by the NSW Auditor-General and whole of Government performance reports (Table 1).

Table 1.

Targets					
22.1 Protect and restore priority land, vegetation and water habitats					
22.1.1 Manage weeds and pests to reduce the impact of invasive species at priority sites on National Parks and Wildlife Service (NPWS) parks and reserves leading to a positive response of native biodiversity at 50% of these sites by October 2015					
	Units	Baseline	2012-13 Actual	2013-14 Est Actual ⁱ	Trend
Measure 22.1.1.1: Percentage of priority management sites subject to control and monitoring where a positive response of native biodiversity has been detected	%	39	n.a.	n.a.	n.a.

Baseline: As at 2011, there are 83 priority management sites subject to control and monitoring.

ⁱ The next data for this measure will be available in Quarter 3 of 2015.

Source: NSW 2021 Performance Report 2014-15. https://www.nsw.gov.au/sites/default/files/initiatives/2014-15_performance_report_-_2021.pdf

Despite having legislated responsibility for pest management the ongoing inability to measure, let alone achieve pre-determined goals indicates pest management is not a core competency of the NSW National Parks and Wildlife Service.

We believe the responsibility for management of pest animals in national park estate should be wholly transferred to other more capable government agency/ies. This would enable NPWS to focus its efforts and resources on other areas of responsibility.

Institutional Bias

Despite a requirement that all Government employees act ethically, lawfully and in accordance with principles contained in public sector Codes of Ethical Conduct, there are rogue employees within NPWS, Department of Primary Industries and Local Land Services with strongly-held anti-hunting, anti-shooting and anti-firearm views that refuse to comply with standards required of public servants and perform their job with impartiality³.

³ Riled rangers target national park hunts. Western Advocate, 4 June 2012. <http://www.westernadvocate.com.au/story/96608/riled-rangers-target-national-park-hunts/>

Unfortunately, these anti-hunting views are unable to be kept in check despite written directives by senior management (Attachment 1).

Following announcement of the NSW Government's policy supporting hunting in national parks, many employees attended protest rallies, made media statements and implemented industrial action and refusing to co-operate with implementing the government's plan.

Regrettably, anti-hunting sentiment exists in even at executive and senior management level positions within government agencies. For example, in 2011 the Australian Government's Department of Agriculture, Fisheries and Forestry published a model for humane vertebrate pest destruction⁴. The humaneness model was purported to be evidence based and independent, however a comprehensive critical review of the model found unexplained anomalies and inconsistencies in the model's humaneness scores; the review concluded the humaneness model was biased against ground shooting (Attachment 2).

The Federation recommends that government agencies involved in pest management programs that potentially involve shooting as a management option, require employees to declare any personal objections they may hold to hunting, shooting or killing of animals.

For the sake of transparency we recommend that declarations also be made by the Commissioner for Natural Resources and members of the Advisory Committee. This is a reasonable measure to ensure that any persons who hold philosophical or moral objections to shooting or hunting can be removed from exerting any inappropriate influence on pest management programs.

The Role of Recreational Hunters

There are two models for utilising recreational hunters to help control pest animals on public land – the 'State Forests model' and the 'National Parks model'. The two models are markedly different; under the State Forests model hunters are not under direct supervision by government agency employees and are permitted to use non-factory ammunition. Under the National Parks model, hunters are under direct supervision by national parks staff and are restricted to using factory ammunition only.

The effectiveness of the State Forests model has been demonstrated over 8 years of operation with safe and effective removal of large numbers of game and feral animals, as well as returning a positive public benefit. The public benefits of the State Forests model for hunting on public land for 2012-2013 were estimated at \$6.77 million. This exceeded net government funding of \$2.565 million, providing a net public benefit of \$4.45 million⁵. By contrast, the

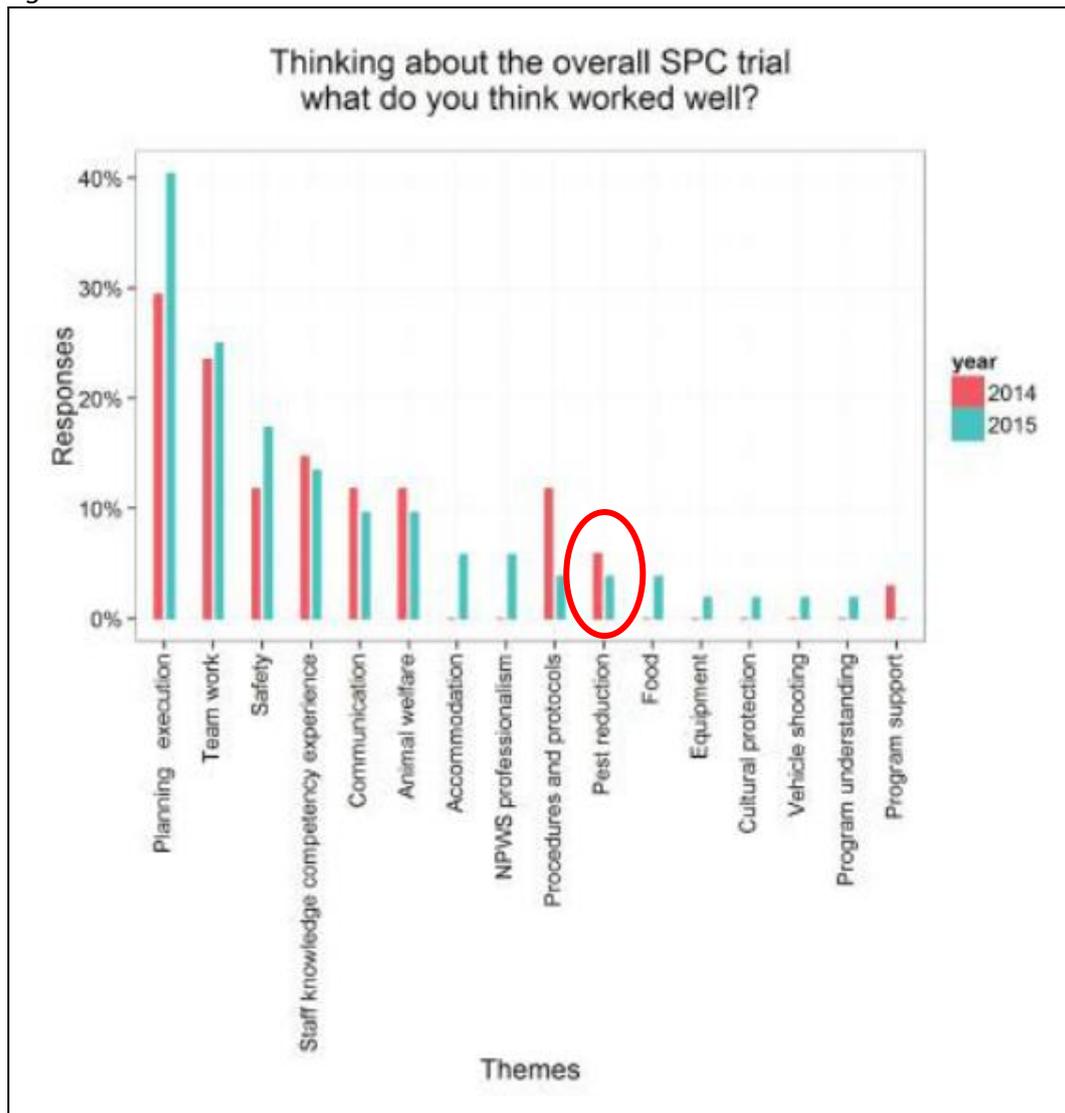
⁴ A model for assessing the relative humaneness of pest animal control methods. Second edition June 2011. http://www.agriculture.gov.au/Style%20Library/Images/DAFF/_data/assets/pdf/0008/929888/humaneness-pest-animals.pdf

⁵ Game Council of NSW. 2012-2013 Public Benefit Assessment, June 2013.

National Parks model has been quoted as costing \$1.416 million to remove fewer than 200 animals and has been described as ineffective and wasteful⁶.

Preliminary results of the NPWS Supplementary Pest Control (SPC) program trial using recreational hunters to help control targeted pest species in 12 National Parks show that less than 10% of participants believed the SPC trial had ‘worked well’ in terms of ‘Pest Reduction’ in the first year (2014). This proportion declined even further in the second year (2015) of the trial (Figure 1).

Figure 1.

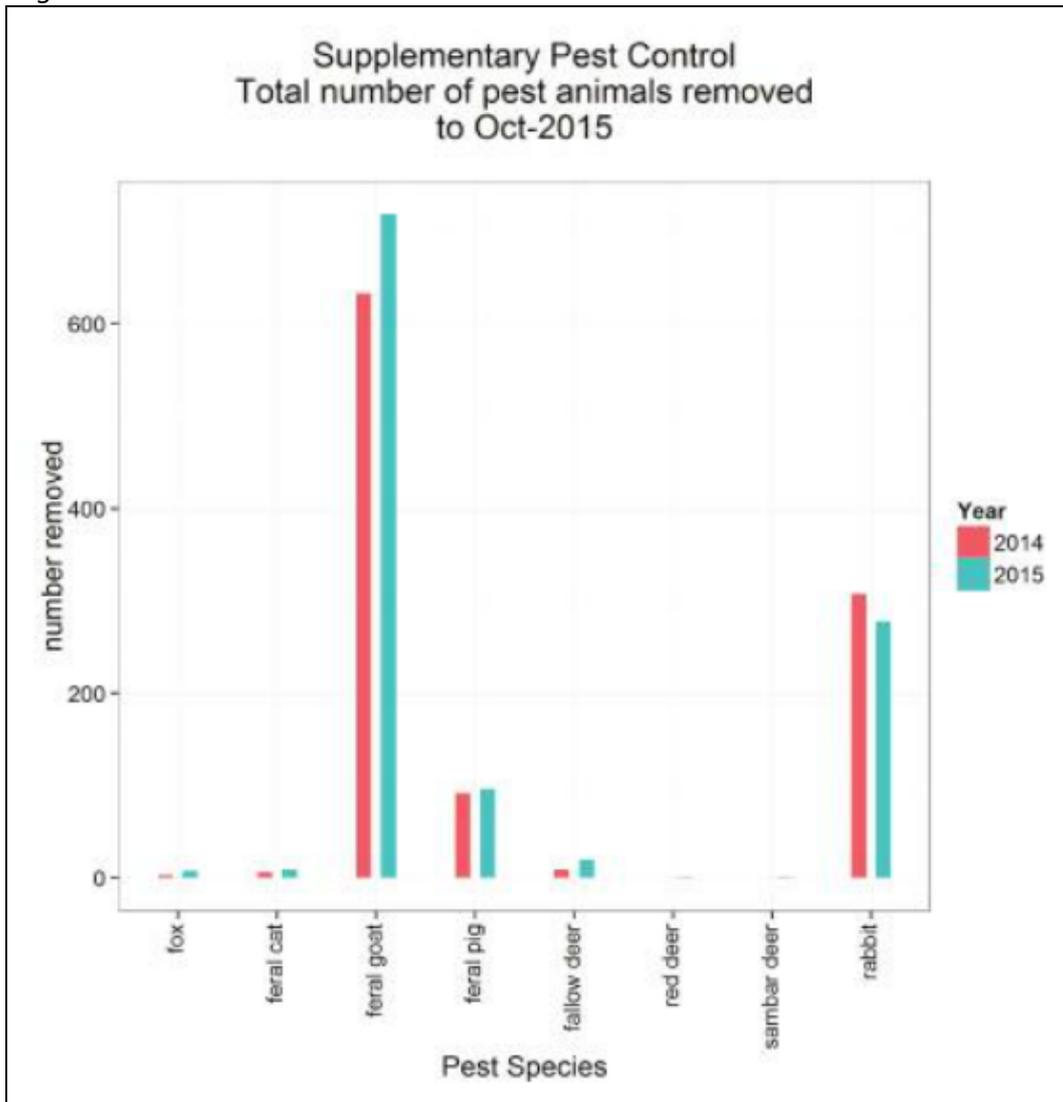


Source: <http://ssaansw.uberflip.com/i/607896-nsw-shooter-quarterly-review-december-2015>

Results for the first 2 years of the 3 year SPC trial show only modest numbers of pest animals removed and a high level of concentration on just 3 pest species: goats, rabbits and pigs (Figure 2).

⁶ \$7150 for each animal killed in NSW hunting program. Sydney Morning Herald, 24 September 2014. <http://www.smh.com.au/nsw/7150-for-each-animal-killed-in-nsw-hunting-program-20140923-10kogt.html>

Figure 2.



Source: <http://ssaansw.uberflip.com/i/607896-nsw-shooter-quarterly-review-december-2015>

The Federation believes the National Parks model for using licensed hunters to help control vertebrate pest on public land is overly bureaucratic, stifling, and based on preliminary results, not an efficient nor a cost-effective method of controlling pest animals. One Federation member likened the National Parks model to having a driving instructor in the car with you, even though you’ve been driving safely for 30 years.

Regulatory Barrier: Suppression of Access to Technological Advances

Shooting is probably the most acceptable fatal form of pest control among the public and other stakeholder groups and is seen as comparatively humane and specific if carried out with skill⁷. Furthermore, Australia’s professional wildlife managers accept hunting is a valid pastime and a

⁷ Public attitudes to current and proposed forms of pest animal control. <http://www.pestsmart.org.au/public-attitudes-to-current-and-proposed-forms-of-pest-animal-control/>

valid means of controlling pests. In a survey of members of the Australasian Wildlife Management Society most respondents agreed it is ethical for humans to manage and control populations of wild animals, and that it is possible to view wildlife with reverence and still participate in hunting⁸. Shooting was the preferred method for culling foxes in a semi-rural setting where 1080-baiting was not feasible because of the small nature of many holdings, the proximity of dwellings in the area, and the anti-baiting sentiment of many of the locals⁹.

There is widespread recognition of the role for firearm moderators (suppressors/“silencers”) to assist in controlling pest animals¹⁰. Despite the many recognised benefits of silencers, they are designated ‘prohibited weapons’ in NSW and are only available under a Commissioner’s permit from the NSW Firearms Registry. The *Weapons Prohibition Act 1998* (s11) identifies nine genuine reasons for applying for a silencer permit, including:

Reason: recreational/sporting purposes

The applicant must demonstrate that the recreational or sporting activity concerned requires the possession or use of the prohibited weapon for which the permit is sought.¹¹

However, the NSW Firearms Registry’s silencer application ‘Genuine Reason’ form omits the ‘recreation/sporting purposes’ genuine reason, among others, in what is clearly an attempt to suppress and restrict the number of applications for these devices¹².

The NSW Firearms Registry however has no hesitation in issuing silencer permits to National Parks and Wildlife Service employees “for the purposes of feral animal pest control and animal management” on the basis that a silencer would reduce noise disturbance of nearby residents and the public¹³.

The NSW Firearms Registry readily issues silencer permits to government agencies yet rejects applications for silencer permits from appropriately licensed individuals for the same genuine reason. This is duplicitous.

Obstruction to legitimate access and lawful use of silencers for pest management by licensed firearms owners is an impediment that needs to be removed.

⁸ Wildlife management in Australasia: perceptions of objectives and priorities. <http://www.publish.csiro.au/paper/WR04042.htm>

⁹ Case Study: Coordinated fox shooting program. http://www.pestsmart.org.au/wp-content/uploads/2011/10/PSCS2_fox_SthCstNSW.pdf

¹⁰ Martin MacCarthy, Martin O’Neill and Helen Cripps. Edith Cowan University WA. An investigation into the use of sound moderators on firearms for game and feral animal management in New South Wales. Report prepared for Professor Robert Mulley Chair, Research Committee Game Council of New South Wales (unpublished report).

¹¹ Weapons Prohibition Act 1998 No 127 (s11). <http://www.legislation.nsw.gov.au/maintop/view/inforce/act+127+1998+cd+0+N>

¹² Prohibited Weapon Silencer Permit Genuine Reason Form. NSW Firearms Registry. http://www.police.nsw.gov.au/__data/assets/file/0019/262009/PW_GR_Silencer_-_2013.pdf

¹³ GIPA576, Disclosure Log 2015. NSW Office of Environment and Heritage. <http://www.environment.nsw.gov.au/whowere/disclosurelog2015.htm>

Recommendations

- That responsibility for management of pest animals on national park estate be wholly transferred to other more capable government agency/ies.
- That Government agencies involved in pest management programs, including the Commissioner for Natural Resources and members of the Advisory Committee, require employees to declare any personal objections they may hold to hunting, shooting or killing of animals.
- That the NRC undertakes or commissions an independent review of Sharp and Saunders' model for assessing the relative humaneness of pest animal control methods.
- That the NRC request the Director of the NSW Police Firearms Registry:
 - include all nine genuine reasons on the *Prohibited Weapon Silencer Permit: Genuine Reason Form*, and
 - assess applications for silencer permits from non-government applicants fairly and without prejudice.
- That State Forest model of hunting on public land be recognised as a safe, efficient and effective method of controlling pest animals.

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http://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/Completed_inquiries/2004-07/invasivespecies/report/index

Attachment 1: Inappropriate expression of anti-hunting sentiment



Office of
Environment & Heritage
NSW National Parks & Wildlife Service



Our reference: [REDACTED]

[REDACTED]

Dear [REDACTED]

I write in response to your email to the Premier regarding the presence of National Parks and Wildlife Service staff members at a demonstration against hunting in national parks at a NSW Government Community Cabinet meeting in Orange, and your email to the Minister for the Environment regarding staff presence at a demonstration at Alstonville.

I appreciate your concern at their behaviour and I apologise for the delay in my response.

I acknowledge that many staff and stakeholders have significant concerns and firmly-held personal views on the NSW Government's decision to allow pest control through the use of licensed shooters in selected national parks, nature reserves and state conservation areas. Many staff have particular concerns about the risk that the activity may pose to workers, visitors, wildlife and the environment.

Nevertheless, I have reminded staff that as public servants it is our responsibility to approach our work impartially, implementing the policies and decisions of the government of the day in a politically neutral manner regardless of our personal beliefs and opinions. As such, it was inappropriate for staff to wear NPWS uniform at such a political rally.

Yours sincerely

Bob Conroy 22/8/12

BOB CONROY
A/Head - National Parks and Wildlife Service

Attachment 2: Humaneness Scores for Aerial versus Ground Shooting

(Excerpt from an unpublished critical review by Steve Larsson of Sharp and Saunders' humaneness model)

	Aerial Shooting		Ground Shooting	
	Head Shot	Chest Shot	Head Shot	Chest Shot
Wild Deer		4C (not specified; assume chest)	3A	3D
Feral Pig	-	4B	2A	2D
Feral Goat		4C (not specified; assume chest)	3A	3D
Feral Donkey	3A-4A	3C-4C	3A	3D
Feral Horse		4C (not specified; assume chest)	3A	3D
Feral Camel	3A-4A	3C-4C	3A	3D

Mode of Death: A= Less suffering ← → D=More suffering

Comment

For **Aerial Chest Shot** versus **Ground Chest Shot** (red circles) there are unexplained differences in assigned humaneness scores. The table above assigns:

- a one category *better* score assigned to Aerial Shooting versus Ground Shooting i.e. 'C' vs 'D' (Wild Deer, Feral Goat, Feral Donkey, Feral Horse, Feral Camel)
- a two category *better* score assigned to Aerial Shooting versus Ground Shooting i.e. 'B' vs 'D' for Wild Pigs.

Conclusion

No explanation is given, nor supporting evidence provided, to explain the preferential (biased) scores assigned for Aerial Shooting versus Ground Shooting, even though the animals are shot in exactly the same place (chest).

¹ A Model for Assessing the Relative Humaneness of Pest Animal Control Methods, Second edition June 2011
<http://www.agriculture.gov.au/Style%20Library/Images/DAFF/data/assets/pdf/0008/929888/humaneness-pest-animals.pdf>