

## **Response to State-wide review of NSW pest animal management**

**With reference to: Issues paper ISBN 978 1 925204 11 7**

**From: Game and Pest Management Advisory Board**  
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To: Dr John Keniry AM, and Committee

Natural Resources Commission of NSW

Thank you for the opportunity to comment on the Issues Paper titled "State-wide review of NSW pest animal management". At a recent meeting of The Game and Pest Management Advisory Board (the Board) there was considerable discussion and a number of comments made in relation to the Issues Paper. These will be addressed.

For context, the Game and Pest Management Advisory Board is constituted under the *Game and Feral Animal Control Act 2002*. Board members are appointed by the Minister for Primary Industries, and the Board is administered through the NSW Department of Primary Industries. However, the Board is independent of the Department of Primary Industries. Some, but not all of the functions of the Board include:

- *to represent the interests of licensed hunters in matters arising under this Act,*
- *to provide advice on request to the Minister or the Regulatory Authority on game and feral animal control,*
- *to provide advice on request to the Minister on priorities for research expenditure,*
- *to provide advice to the Minister or the Regulatory Authority on educational courses relating to hunting.*

Major discussion points arising from the Issues paper, in no particular order, were:

- Ambiguity between the Premier's TOR, which centred on a need for improved management of pest animals across all land tenures, yet the review excluded native animals, which potentially excluded discussion on very significant pest species such as kangaroos and wombats. We believe this is a major omission.
- The Board acknowledged the positive approach by the Commission to gather and manage data so that decisions for pest management will be evidence based. Within this context the Board will promote the need for data collection by licensed hunters on public and private land, to assist data mining and management.
- There does not appear to be a mechanism in the Issues paper to address institutional bias (a clear barrier to success) which works against currently available control methods from being fully exploited. Specifically, the harnessing of volunteers from the hunting community as part of co-ordinated management programs, and regulatory barriers preventing those volunteers from accessing the most suitable tools for the job at hand.

- The Issues paper acknowledged that biosecurity is about risk management, and the Board believes that licensed hunters can assist with effective management of established pests that cannot be eradicated in NSW. This role may be pivotal to sustained containment effort of some species on both public and private lands given that agency and other funding sources for pest management are frequently time limited, and/or insufficient. The potential for harnessing licensed recreational hunters, a very large and under-utilised resource, to assist with information capture (citizen science), pest management and pest animal surveillance is rarely mentioned in your paper. We request that you give this opportunity more consideration in the final report.
- The Board is in agreement with the guiding principles on page 3, though some members expressed concern at the section titled 'Accountable', especially dot point two. The idea that private landholders could/would be held accountable for achieving results, and the cost burden that this could entail, needs to be carefully thought through, as landholders already carry a cost burden for pest (animal and plant) management and control. Again recreational hunters could assist land managers (private and public lands) with pest identification and pest animal mitigation as part of landholder accountability.
- The management objectives in the Issues paper are not defined. There is an implied assumption that management equals suppression. Trout are an example of an introduced species that are managed with regard to the triple bottom line, and a clear example of how management does not always equal suppression.
- The paper does not define what a pest is. There is an assumption that an introduced species is universally detrimental to the environment, when the reality is that most damage results from a local over abundance. Hence, what is considered a pest in one location might remain a relatively benign, low priority participant in the ecology of another location. Further, the situation constantly changes over time depending on populations and seasonal conditions. A static, one size fits all approach is at risk of leading to unintended consequences.

### Specific comments on Issues

Section 3 – Issues: This section largely deals with impacts and costs of pest animals. The Board recommends counterbalancing the information presented with some of the economic benefits of harvesting pests such as deer, goats and rabbits. For instance, a recent report by KPMG in Victoria, commissioned by the Victorian Game Management Authority, estimated total expenditure from recreational hunting in that state to be \$420million pa. A report conducted by UQ estimated the national expenditure by recreational hunters at \$1.2billion pa. If the commercial value of harvesting rabbits, feral goats and rabbits are added to the value of recreational hunting in NSW, the amount would be considerable. The TOR called for an evidence-based triple bottom line approach to this review, which we support. The Board represents a resource that can assist with on-going containment of vertebrate pests and protection of assets, by reducing the spread and severity of their impact.

Section 3.1 – Roles and responsibilities: The Board supports the underlying principle of ‘shared responsibility’ (page 7), and note that The DPI is clearly labelled as the ‘lead agency’ (page 8). In the summary of responsibilities for pest management in NSW we again draw attention to the potential assistance available to agencies and private landholders via licenced, well trained and educated hunters. Obtaining answers to Question 7 at the bottom of page 8 will require a scientific approach, and a number of approaches to pest mitigation will need to be trialled and evaluated. This work will need to be conducted spatially and temporally to produce the evidence required for adaptive management of vertebrate pests.

Section 3.2 – Shared Ownership: The Board believes that the wider community needs to be better informed and educated about the social, economic and environmental impacts of pest species, and of the ways that vertebrate pest species can be humanely killed or harvested for further use. The current debate on removal of wild horses from Kosciuszko National Park is a good example of how educating the general public about the need for pest mitigation requires substantial amounts of evidence and an astute marketing campaign to over-ride emotion. In southern NSW there is community awareness of the need for mitigation of duck damage of rice crops. An effective partnership between farmers and recreational duck hunters has been established by a range of community education measures, capacity building, and agency support. The Board encourages shared ownership for pest animal mitigation, and suggests that minimising levees and costs for compliance, combined with increased community awareness of the need for pest mitigation is essential. We support research and expenditure to achieve this.

Section 3.3 – Priority Pest Species: The Board re-iterates the position that exclusion of native animals in the review does not fit with the Premier’s TOR, which were set in the context of the definition of what a pest is, rather than a list of pest species. Prioritisation of species for management purposes runs the risk of concentrating resources in a few areas, which will be viewed by many as being too restrictive, and will likely disenfranchise support from sections of the community and some stakeholders. For instance, the exclusion of native pests (kangaroos in particular) from the study compromises any likely recommendations. The Board recommends that the report needs to be developed around the definition of what a pest is, and how to deal with pest species either singularly or in combination, rather than just target a collection of feral animals. Biosecurity and social impacts should be high on the list of reasons informing decisions on pest management. Again, evidence is required to support management decisions, and the Board suggests that Citizen Science could be an important support mechanism to gather that evidence.

Section 3.4 – Landscape Approach: The Board acknowledges that this approach is cross tenure and provides the opportunity to minimise perverse outcomes from a single targeted approach to pest animal management. The Board recommends that trialling and monitoring the effectiveness of different interventions needs to be strengthened, that decisions are evidence based, and that different strategies may need to be developed to accommodate, landscape features, pest population differences, and unintentional outcomes associated with removal of a pest species from the landscape. The Board also agrees with the proposition in question 5 on page 12 that adaptive management relies on data/feedback of information to make improvements. Many hands make light work, and the time voluntarily invested by recreational hunters in landscape surveillance can assist with the landscape approach. The Board also supports the view that the regulatory burden on

farmers and landscape managers can be a constraint to timely and effective management, and recommends that the process for implementation of pest control be examined for impediments.

Section 3.5 – Emerging Issues: The Board wishes to emphasise here that to many landholders and some rural communities, pests are a commodity and can be sustainably harvested and effectively managed. One obvious example of commercial exploitation of a feral species is trout, and several terrestrial species are similar, including deer. The Issues Paper rightly acknowledges the potential for recreational benefits from shooting and hunting, and the economic gains that can be derived from these activities. Further development of the hunting industry, and government support for commercial harvesting of pest animals, should be seen as an opportunity to better manage a range of established pest species. Attempts to eradicate an established species are usually futile, and economically unwise. In the 1970's the NZ government turned a NZ\$30 million pa pest mitigation of red deer problem into a NZ\$300 million+ pa export industry within 30 years. Australia should not ignore that example.

Section 3.6 – Adequate Resourcing: The Board noted elements of 'Barriers to Success', such as 'declining capacity' and 'opportunities for increased co-operation', and wondered why harnessing members of Approved Hunting Organisations (AHO's), of which there are >200 listed on the DPI Game Licencing Register in NSW, has not been considered. We also thoughtfully recommend that NRC removes question 8 at the bottom of page 15, given that the people involved in the activities listed are self-funded, and are already offsetting pest animal control costs that would be incurred by others if they were financially discouraged from engaging in these pursuits. Such questions are negative, and work against community participation that was encouraged earlier in the paper.

Section 3.7 – Knowledge Building: Feedback to the Board from members of AHO's and farmers includes all of the elements listed under 'Barriers to Success' at the top of page 15, and we agree that research and investment into ways to communicate important messages on pest mitigation to the wider community would be money well spent. The wide range of views and community perceptions on harvesting animals needs to be addressed so that pest management strategies, for native and exotic species, can be quickly and properly implemented when required. Greater exposure of agency activities, research findings, and recreational harvesting in industry level publications such as 'The Land', ABC TV/Radio, and social media such as advertorials on Facebook may assist with wider and more rapid dissemination of information about pest management to the wider community. Sensible engagement of people in the wider community is pivotal to future pest animal management success. The Board also believes that 3 year funding cycles are an impediment to success, especially for ongoing data collection and management, and we recommend that the NRC argue strongly for establishment of a central data management repository with committed ongoing funding as part of reporting back to government.



Chairman Emeritus Professor Robert Mulley and Committee

25/11/15

NSW Game and Pest Management Advisory Board