30 November 2015

Natural Resources Commission
GPO Box 5341
SYDNEY NSW 2001
By email to nrc@nrc.nsw.gov.au

Re: State-wide review of NSW pest animal management – Issues paper submission

Sporting Shooters Association of Australia (NSW) Inc “SSAA NSW” is pleased to provide a submission for the NSW Government’s review of pest animal management. SSAA NSW has also appreciated the opportunity to be involved in the review workshops and focus groups.

It is widely recognised that many introduced species to this country have established significant populations and as a result have become major pests of agriculture and the environment. These pose a real risk to Australia’s biosecurity and need effective and efficient management to limit their negative environmental, economic and social impacts.

SSAA NSW represents more than 53,000 individual members and operates a network of 49 Branches throughout the state, thus making it one of the largest organisations representing shooting and hunting in New South Wales.

With more than eighty percent of members involved in recreational hunting and pest management activities, SSAA NSW and its members already play an important role in pest animal management. SSAA NSW strongly believes that the use of volunteer shooters and hunters is an underutilised resource and this is where it, and its members can make a greater contribution to pest animal management.

However, to achieve effective results, it is vital that a framework is established that incorporates inter-agency cooperation, a composite stakeholder body, and that ensures engagement of all stakeholders to align pest management approaches and strategies across all land tenures. SSAA NSW is keen to continue working with the Government and the many stakeholders to achieve a suitable outcome.

As with any problem, an integrated strategy which incorporates a range of solutions is essential to achieving a suitable outcome.

SSAA NSW is a strong advocate of this approach, especially in regard to its pest animal management activities. SSAA NSW has a number of ‘tools in its toolbox’ that are currently being used by its members to assist with managing pest animals across both public and private land:

- In National Parks – the NPWS Supplementary Pest Control (SPC) Program is almost two-thirds through its 3 year trial. SPC is proving itself as a successful component of NPWS’s integrated pest management approach and as being the type of model accepted within the wider community for removing pest animals from National Parks.
• On Farming Land – Farmer Assist is a SSAA initiative which will is now being implemented in NSW following its success in other states such as Queensland, South Australia, Tasmania and Western Australia. It enables farmers to request assistance from SSAA members for individual or ongoing pest animal issues. Importantly, the control of who participates, when and where shooting activities occur and what pest animals are targeted remains with the farmer.

• In State Forests – the DPI Restricted Licence (R-Licence) model has been successfully used to manage pest animals in declared state forests throughout NSW for many years. SSAA NSW is an Approved Hunting Organisation (AHO), a Hunter LEAP Provider and has long been an advocate for this model in state forests.

Before being disbanded, the former Game Council NSW had developed the OutREACH Program that sought to build capacity and support networks through AHOs to deliver hunter education which also included, in part, feral pest management. Unfortunately, when the Game Council was disbanded, the OutREACH Program also ceased.

The Department of Primary Industries Game Licensing Unit now has carriage of hunter education and, with the Hunter LEAP Program, is in the process of developing short course modules and programs. SSAA NSW firmly believes that DPI GLU may have a more significant role to play in the delivery of education to a number of different stakeholders, including SSAA, which may improve capacity building among volunteer groups.

An informal survey of members has identified that many are willing to participate in relevant education and training courses to further develop their skills as well as enhance their knowledge in invasive species and pest management. Further to this a number of members also expressed their willingness to participate in non-shooting activities if they were to become available to volunteers; revegetation, monitoring and data collecting are a few examples. This could lead to a transition from government agencies to community led approaches easing part of the burden on some already stretched agencies.

A recent survey on the Expenditure and motivation of Australian recreational hunters [Finch, Murray, Hoy & Baxter 2014] identified that over 99% of respondents indicated that they would be willing to participate in direct wildlife management activities, such as pest control. Also of particular interest was that when asked to categorise what motivated respondents to hunt, most selected pest control followed by recreation and hunting for meat. Many respondents already participate in other non-hunting natural resource-management activities including baiting or trapping, weed control, tree planting, fire management, property management, wildlife watching, bird watching and fishing.

SSAA NSW believes that the use of volunteer shooters and hunters, although already being utilised, needs to be recognised as an ethical and socially acceptable practice. In order for this to occur the community must be educated on the issues relating to pest animals in NSW and the measures, strategies or processes that are undertaken on a regular basis as part of their control. Whether it be shooting, trapping, mustering, baiting, improved public perception and acceptance is vital for the future prosperity of nil tenure approaches to pest management in NSW. In addition, that acceptance will also enhance the likelihood of members of the community reporting pest animal incursion activity as the ‘eyes and ears’ of their environment.

Local and regional strategies which include field days, exhibitions and shows as well as print and media campaigns could be employed to educate the general community on the negative impacts of pest animals and the management tools that are used to address this serious problem. With approximately 64% of the states’ population living in the Greater Sydney region [Source: ABS] there is a growing percentage of urban dwellers that are oblivious not only to the problem of pest animals, but generally about food production and agricultural industries.
The current unfavourable perception of recreational hunters extends to the farming community. It is vital that the discord between the perceptions of the farming community and the objectives of recreational hunters involved in pest animal control are aligned. Communication and education campaigns delivered through representative organisations, such as SSAA NSW and other hunting organisations, farming bodies such as NSW Farmers along with government agencies such as Local Land Services and the Department of Primary Industries would greatly improve this and form the basis for positive working relationships.

The National Parks & Wildlife Service SPC Program is an example of a model that can achieve a range of positive outcomes when volunteer shooters are used as part of an overall pest management strategy. In the two years that SSAA NSW has been participating in the SPC Program, strong working relationships have been built which has included the development of a mutual understanding and respect between all stakeholders.

As with any structured shooter based activity, volunteers must undergo a structured accreditation process in order to participate in the Program. Requirements include participation in group sessions, online theory components as well as practical assessments. It is worthy of noting that volunteers are willing to meet the requirements and a positive by-product of the accreditation process is a strong sense of ownership and responsibility for the success of the Program.

SPC Program operations are planned with precision and an overwhelming emphasis on safety. This ground-based shooting program is cost-effective with the use of volunteers, has a relative humaneness score lower than most other methods of pest control (refer www.pestsmart.org.au) and is target-specific with particular strategic outcomes identified. The inclusion of an expanded and modified version of this Program as part of a long-term management plan for National Park estate is strongly supported by SSAA NSW. There is also potential for the basis of this Program to be utilised to develop other models to manage pest animals on other lands affected by triple bottom line impacts.

The current limited availability of sufficient scientific data on emerging issues from pest animals and the use of volunteers as part of the solution could be a contributing factor for the low level of community awareness and hence public education opportunities.

SSAA NSW recognises the need for having a centrally based reporting system or agency that encourages volunteer and community based initiatives and has regular interaction with each body. Improved education and adoption of available technology creates an opportunity for better data collection and sharing across a wide landscape. Access and availability of the internet and mobile services opens up pathways for the development, collaboration and storage of data in an easily accessible, real-time network. A fantastic example of this is demonstrated by feralscan.org.au although the current accuracy of the system needs to be explored.

The pest animal problem in NSW varies according to the different landscapes and tends to be geographical in nature (spatial ecology). For instance, higher concentrations of goats and pigs have been recorded in central and western districts of NSW, with higher numbers of cats and foxes in the central and eastern portion of the state. It is widely recognised that pest animal management works best as part of an integrated program using a variety of techniques, because individual animals that are not susceptible to one technique can be removed using another. It is for this reason that perhaps Local Land Services should have more discretionary power in coordinating the control of pest animals in NSW.

It is SSAA NSW’s view that the pest animal management review should not solely focus on specific pest animals but should recognise all declared pest animals and introduced species in a broader approach to this complex issue. By categorising and prioritising the different threats posed by each species, the better the planning and execution of reducing the risks will be.
Threats or impacts that should be considered include; grazing impacts, crop impacts, predator impacts, infrastructure damage, environmental impacts, disease risks and the risks to human life. Wide spread populations of declared serious pests such as the major six; feral goat, feral pig, European rabbit, European red fox, wild dog and feral cat, have resulted is asset-based management techniques. It could be argued that this approach is in effect a sustained management approach.

In the instance of new or emerging species rapid targeted management should be given the highest of priorities in stamping out the invasive species before they have the ability to become fully established beyond the point of containment (eg, eradication of yellow crazy ants from Goodwood Island), so we don’t end up with another serious pest where asset-based protection is the only viable control method or sustained management approach.

The issues paper also identifies other pest animal groups not mentioned above. Of particular interest among SSAA NSW members is ‘wild deer’. Although currently listed as a game species, many members believe that deer should also be included as an invasive pest species. As populations of deer continue to grow, there is increased potential for them to cause considerable issues for the agricultural industry; wild deer may be involved in the spread of Johne’s disease between cattle herds and sheep flocks. Deer also pose a risk to public safety as populations continue to grow on suburban fringes causing horrific car accidents, injuries and possible deaths.

Amendments to the Game and Feral Animal Control Act 2002 saw the formation of the former Game Council. At this time deer were declared a game species and it became mandatory to hold a General Licence (G-license) to hunt deer on private land. The exhibited attitude of members was one of frustration, dissatisfaction and disappointment as they were forced to pay an additional fee for a licence that required no training, no membership of an AHO and was therefore seen as simply revenue raising by the then Game Council (current cost of $75 per year).

There has been considerable ground swell amongst members who believe that as it has been made too difficult and costly to be permitted to hunt deer on private land, deer numbers are not being controlled to the extent they were prior to the declaration of deer as game. In fact, many members no longer hunt deer altogether in protest of having to pay for a licence to hunt an introduced species on private land. Since land owners and occupiers of private land are currently exempt from holding a NSW game hunting licence it is only fair that hunters on private land are provided the same opportunity. Members have also expressed a desire to hunt deer all year round, as they do in Victoria (with the exception of Hog deer), and would like to be able to hunt deer at night under spotlight when the animals are more active.

In comparison, there is positive acceptance of the R-Licence which provides the opportunity to hunt deer and other non-indigenous species on public land, in particular state forests, despite the fact that it requires the completion of an assessment and membership of an AHO. SSAA NSW supports the retention of the R-Licence model and the continued access to state forests for recreational hunters. This model is a further example of the acknowledgment by recreational hunters of the need for structured programs that provide access to public land for hunting.

Since deer are appreciated for their aesthetics, and are a valuable hunting resource, it is unlikely that they will ever be eradicated, but rather controlled within an acceptable population density. Deer and other non-indigenous hunting supports industry and generates economic activity in regional areas.
An outcome of SSAA NSW pest management activities, has been the identification that a more coordinated approach with neighbouring property owners may prove of greater benefit. At the very least permission from those property owners, to swiftly and humanely dispatch pest animals that wonder outside the boundaries of activities in search of better refuge when they are taking place, or if the animals are grazing on neighbouring properties, or in the transitional phase between grazing and seeking refuge. This is simply one of many examples that emphasise the importance of a nil or cross tenure approach and its importance in any strategy to effectively manage pest animals.

Early intervention can only be achieved if the level of monitoring, data collection and reporting is regular with an appropriate amount of funding provided to ensure participation levels are steady, that stakeholder motivation and contributions are highly valued and their importance to the longevity of any such program is acknowledged. Utilising networks, such as SSAA NSW, should be considered more frequently in pest animal management programs throughout the state. We all have a role to play and with a number of ‘tools in the toolbox’ our members are able to mobilise quickly and have a wealth of experience and skills to contribute. As can already be seen with the SPC Program in NSW, Farmer Assist in other states, other co-operatives such as the Hastings Wild Deer Working Group and the different partnerships between National Parks bodies, SSAA and other hunting groups in other states.

As with most collaborative and coordinated pest animal approaches it would be noteworthy to include a wide variety of stakeholders including landholders, government, research bodies, industry, the community and volunteer organisations to ensure the views of all groups are represented. The data and feedback can be collated and reviewed for consistency and measured for bias. To date, SSAA NSW has relied on individual member feedback through the use of surveys to rank the various operational components of its different activities.

SSAA NSW believes this Review provides a real opportunity to incorporate the use of volunteer shooters and hunters to assist with pest management across all land tenures. With more than 53,000 members and a Branch network spread across the state, SSAA NSW is an organisation with strong community linkages that strongly emphasises best practice in many areas including safety, hunter education and training with emphasis on ethical hunting, animal welfare and conservation of the environment.

Adequate funding will inevitably be a real sticking point among many stakeholders. More than 68% of the 7140 respondents of the survey into Expenditure and motivation of Australian recreational hunters [Finch, Murray, Hoy & Baxter 2014] answered that they were willing to pay a levy on all hunting merchandise purchased in Australia if it were to support conservation programs. Of those willing to pay, 60% supported a 5% levy and 30% supported a 10% levy. This could be an additional funding model that could be adopted, but only if all the funds were put toward conservation programs and there was a significant inclusion of, and benefit to, recreational hunter resources in any resulting pest animal management program.

The recreational hunting industry and the economy as a whole could experience increased benefit if volunteers had access to further accreditation programs for professional development such as those available to commercial harvesters. Reports from April this year identified that there were conditions such as drought and dwindling hunter numbers that had a significant impact on the game meat industry. Nil cost accreditation could be the mechanism to incentivise recreational hunters in helping rejuvenate this industry.

Sensationalised and emotive actions of the ‘Extreme-Greens’ poses a threat to effective implementation of research outcomes as the barriers and hurdles of politics must be overcome. If the research outcomes are in-line with the overall guise of a new regulatory framework, then responsibility and authority must be given to the lead organisation to enact the research outcomes and coordinate the new or alternative indoctrinated approaches to the plan.
However, difficulties may arise where certain conditions as determined by government policy, may hinder the adaptation or change to existing or subsequent programs. An example of this is evident in the SPC Program where currently night shooting is not permitted. Night shooting has been identified as a pest management approach that provides benefits with target species that are predominantly active at night. An example of the success of night shooting is demonstrated by the Deer Management Plan for Royal National Park. The 2008-2009 Annual Report outlined that shooting was normally conducted at night, when deer are active and public safety can be appropriately managed. Another great initiative of this program was that wherever possible, deer carcasses were gutted and frozen prior to being transported to various zoo’s where they are fed to the zoo’s endangered tigers and other large cats.

The ongoing objective of SSAA NSW is to build recognition as a valuable stakeholder in the area of pest animal management and the provision of cost-effective, efficient volunteer programs. These programs are aimed at increasing on-ground pest management activities, using readily available resources from within the state-wide community of SSAA members. Past experience has shown that the role of SSAA NSW will continue to be defined by fostering new and existing positive relationships and partnerships with numerous key stakeholders. In its role SSAA NSW will rely on the development of policies that enable utilisation of the experience and specialised skill-sets of its members in the management of established and emerging pests for identified strategic outcomes as part of an integrated pest management approach across all land tenures.

In conclusion, SSAA NSW looks forward to continued engagement with the NSW government, its agencies and other organisations with regard to this Review and also welcomes any opportunity to participate in, and contribute to, the Review outcomes and any resulting initiatives and programs.

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