

7 November 2015

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### **Submission on the State Wide Review of NSW Pest Management Issues White Paper**

Congratulations to the Natural Resources Commission for tackling the protection of natural assets in NSW from the threat of pest plant and animal issues. As land managers and farmers we take the view that our natural assets at the landscape level include environmental, agricultural industry sustainability and productivity as well as cultural values and we need to balance investment across these values. The fact of life and business is that there are always more priorities for investment in managing threats to assets, especially pest plant and animal threats, on the farm, than there are available resources and therefore we try hard to carefully prioritise our decisions.

This submission identifies **three issues** that we request are considered for integration into the NSW 'Pest Issues' policy paper:

#### **1. Deer**

- a. We are based on a beef cattle farm in the Snowy Mountains. We and our neighbours (including the National Park that borders our properties) are overrun with deer – Fallow Deer (*Dama dama*), with an odd Sambar and Red turning up from time to time. This year, over 200 fallow deer have been shot on the property and last year 146 (whole year). In 2014, with our neighbours we dispatched about 450 fallow deer for the year across our collective properties.
- b. Our property is adjacent to Kosciusko National Park; however, while the Park has many deer and this in itself is a major issue for the integrity of the park's ecological assets, the surrounding farmlands, especially those where pest species are not managed well (if at all), are major breeding sites. We estimate we carry around 150 to 200 deer continually across our 800 acres in spite of our continual and committed culling program.
- c. **Why are deer an issue for us?** There are two components to their pest behaviour from our perspective as resource managers;
  - i. Environmental impact on remnant vegetation on private and public lands. Deer are browsers and grazers and prevent establishment of understorey species that provide cover and habitat for smaller birds and mammals; and
  - ii. Agricultural capacity with reductions in stock carrying capacity (5 to 7 *Dama dama* equal 1 breeding cow in our estimation) and they are nearly impossible to fence out of house yards, orchards and tree plantations.

- d. Deer in NSW are currently listed as GAME STATUS animals under the *NSW Game and Feral Animal Control Act 2002*<sup>1</sup> and not as PEST STATUS animals. This means that deer have regulations relating to by whom, when and how they can be culled. Game hunters have convinced the NSW Government in previous years that they can achieve control **and** maintain their recreational sport.
- e. Our evidence is that 'fallow' deer numbers are now **out of control** and rising to plague proportions in this region of NSW. Game hunters usually prioritise their sport on trophy stags and this does not reduce the breeding herd sufficiently to protect agricultural or ecological assets. We have several game hunters who shoot on our land and their impact, while useful, is less than that needed in our experience.
- f. Primary producers are exempt from the *NSW Game and Feral Animal Control Act 2002*<sup>2</sup> in controlling deer on their properties.
- g. PEST status animals such as rabbits or pigs are covered by the *NSW Local Land Services Act 2013*. This Act actively requires 'the state' (e.g. Local Land Services, Local Government, other State Departments) **and** land managers to control them, usually through defined Pest Control Orders. It is an **obligation**<sup>3</sup> for land managers to **control pest status animals** on their lands and this also drives investment in research for control options. Currently, due to their game status, there is **no Pest Control Order for deer** and investment in control options research is consequently limited.

What are we asking of you?

- We are asking you to raise the issue of deer as pest animals and to identify a pathway to achieve pest status for deer in NSW in your review process; and
- We need some better methods for reducing deer numbers than shooting. Can your review process include recommending more investments in research on appropriate, effective and efficient alternative methods for culling *Dama dama*?

## 2. Prioritisation

Our contribution for your consideration for inclusion in a pest policy document supports the policy area, specifically with principles for prioritising resources investment in policy and planning activities in pest management. The principles and tools suggested are simple.

### Prioritising investments in resources management (*protect, enhance, or restore*) for reducing pest impacts

Our resources, in terms of money, people, expertise and time are usually limited. The list of desired strategies and projects identified in state and local pest management plans will invariably require more than the available funding and expertise can support. Outcomes (desired and planned), policy and legislation imperatives, implementation strategies and management options need to be assessed for investment priority.

*In principle, prioritisation of investments needs to be considered on 'how important/urgent this pest threat outcome or program/project is in terms of achieving a target for an asset' and 'how feasible (including benefit cost) success is'.*

#### *Prioritisation Principles for Pest Investments*

Particular prioritisation criteria may include;

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<sup>1</sup> Schedule 3 Part 1

<sup>2</sup> Division 2 **Section 17**

<sup>3</sup> Local Land Services Act 2013, Part 10, Division 2 **Section 142**

1. Assessment of the increase in sustainability of environment assets, productivity of landscapes and in the 'quality of life' of communities if progress is made in pest management;
2. Feasibility of achieving (including benefit/cost) of the particular outcome identified;
3. Importance and urgency for achievement of pest outcomes;
4. Sustainability of likely benefits and degree of integration across land manager and organisational boundaries for pest management outcomes achieved;
5. Potential for participation of government, industry and community stakeholders to achieve leverage in achieving pest management outcomes; and
6. Compliance with the intent in NSW Government legal and regulatory instruments and related local government and national strategies and agreements.

#### *Tool for Prioritisation of Investments*

A tool for estimating the priority of pest outcomes or programs/project investments is to map information about a pest or outcome or program/project along the *x* and *y* axis of a graph, where one axis is about importance and/or urgency and the other is about feasibility and/or benefit/cost. Rankings of **urgency/importance** and **feasibility/benefit: cost** can be provided by an 'expert group' process where individuals who have experience and wisdom about the issue being addressed, and who are without vested interest, can assess outcome investment areas.

Areas mapped as **high** importance/urgency (e.g. because of high asset values or rapid rates of change in condition) and **high** feasibility or benefit/cost (availability of effective solutions) in quadrant 1 (Refer **Figures 1** and **2** for examples) become first order investment considerations, quadrant 2 is considered next as areas with lower feasibility may be redefined into research and development programs/projects, quadrant 3 is next for consideration as feasibility is high although urgency/importance is lower, and areas mapped in quadrant 4 have the lowest priority.

#### **Prioritisation Tool**

- Animal or Plant Pests – this example uses animal pests because it is relevant to our major pest issue - deer.*
- Agricultural and environmental assessment combined from our 'Chimney Ridge' perspective.*

**Figure 1 Example Importance – Feasibility prioritisation**

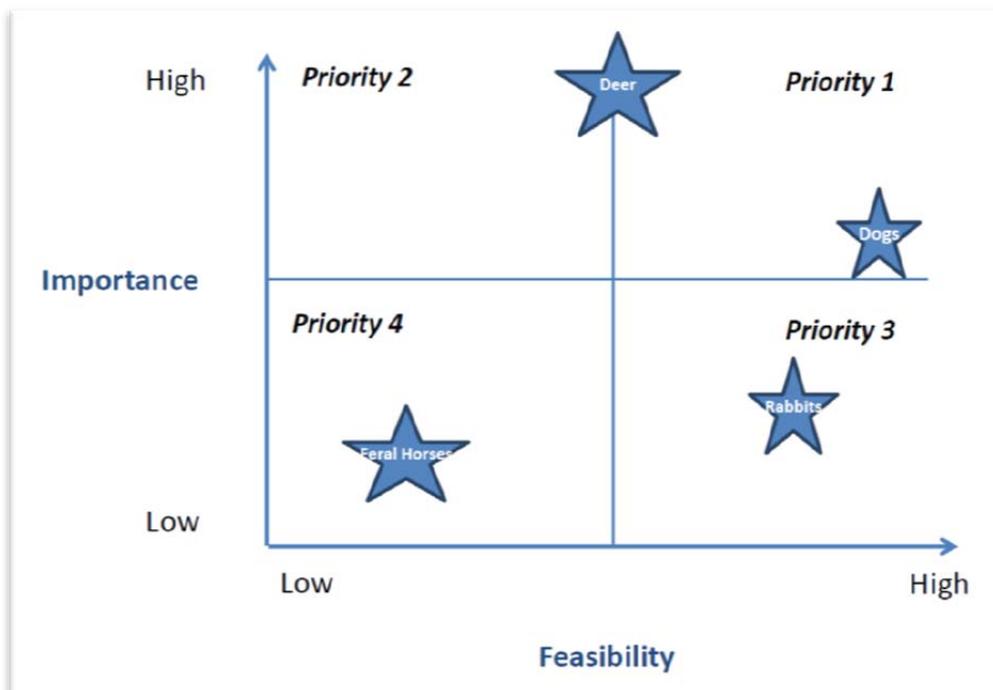
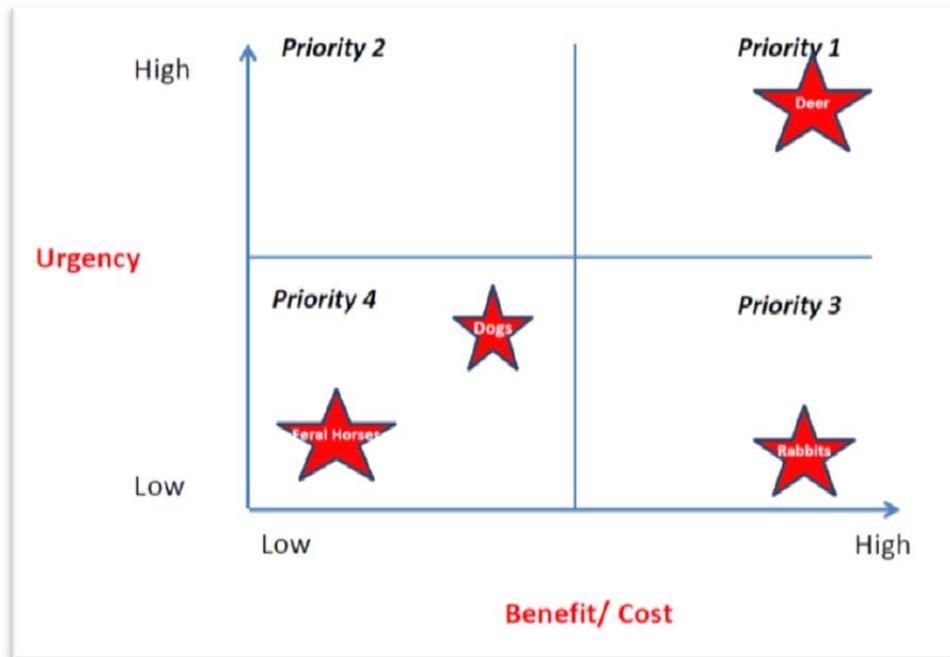


Figure 2 Example Urgency – Benefit / Cost prioritisation



**Note:** Investment prioritisation needs to be based on the best available scientific, economic, social and cultural quantitative and qualitative information.

### 3. *Cross boundary initiatives*

- a. One of the opportunities in pest plant and animal management is for greater cross boundary collaboration in developing plans and implementing actions. We bait for fox control twice a year, however, our neighbours do not. Deer control by shooting is also dependent on groups of land managers working together in a concerted schedule of culling.
- b. Our Landcare experience is that when a policy and strategy decision is made that makes external resource assistance to land managers dependent on land managers bringing at least one neighbour along with them, a more effective and efficient use of that resource occurs. This was the experience with philanthropic investments in landcare e.g. Alcoa Landcare program in Victoria and Western Australia, and with catchment group works e.g. Woody Yaloak Catchment Group of land managers in Victoria, through their 'neighbourhood group' experiences.

Yours faithfully

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JE Roberts

Snowy Mountains