



Office of  
Environment  
& Heritage

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Dr John Keniry AM  
Commissioner  
Natural Resources Commission  
GPO Box 5341  
SYDNEY NSW 2001

Dear Dr Keniry *JOHN*

**Natural Resources Commission final evaluation report on the three-year trial of the Supplementary Pest Control program**

I would like to thank the Natural Resources Commission for the final evaluation report on the three-year trial of the Supplementary Pest Control (SPC) program. The Minister for the Environment, the Hon Gabrielle Upton MP, has asked that I provide a response to the report on behalf of the Office of Environment and Heritage.

I appreciate the Natural Resources Commission's work on this important evaluation project and would particularly like to acknowledge the diligence and professionalism of the commission's staff throughout the process.

The results of your evaluation have been carefully considered and the Office of Environment and Heritage has decided to continue the SPC program, in line with the recommendations of the report. I have included with this letter our formal response to these recommendations.

The Office of Environment and Heritage remains committed to the effective and efficient management of our national parks. I look forward to working with the Natural Resources Commission again in the future to progress priority issues.

If you have any further questions about this issue, please contact Dr Ben Russell, Manager Pests and Weeds, Park Programs, National Parks and Wildlife Service, on 9585 6658 or at [benjamin.russell@environment.nsw.gov.au](mailto:benjamin.russell@environment.nsw.gov.au)

Yours sincerely

**ANTHONY LEAN**  
**Chief Executive**

*29.3.2018*

## **Response to the Natural Resources Commission evaluation of the National Parks and Wildlife Service three-year trial of the Supplementary Pest Control Program**

### **Context to the Office of Environment and Heritage response**

The Natural Resources Commission (NRC) has provided a comprehensive final evaluation of the three-year trial of the Supplementary Pest Control (SPC) program. The evaluation makes nine recommendations, including a continuance of the program to the high standards established during the trial and taking advantage of new opportunities.

As expressed in its response to the State-wide Review of Pest Animal Management, the NSW Government recognises the crucial need to protect the economy, environment and the community from the risks posed by pest animals, and is committed to delivering effective pest animal management for NSW into the future. The SPC program is identified as a tool in meeting the Government's pest management responsibilities in the state's national parks and reserves.

The SPC program provides the National Parks and Wildlife Service (NPWS) with an additional tool when undertaking integrated pest management programs. It also gives qualified volunteer shooters an opportunity to contribute to pest management on NPWS managed lands and help build stronger relationships between NPWS and the community.

The NRC final evaluation concluded that NPWS capably and professionally planned and managed the program with the support of the NSW Branch of the Sporting Shooters Association of Australia (SSAA NSW). Both organisations worked well together, which contributed significantly to the overall success of the program. NPWS worked closely with SSAA NSW to train and qualify volunteer shooters in firearms safety and accuracy, navigation, first aid and risk management.

The program was structured in a manner that enhanced existing integrated pest management programs. The organisational structure enabled SPC to provide a ground shooting service to NPWS reserve managers and clearly defined roles and responsibilities for all stakeholders. NPWS programed pest management actions as part of an integrated approach and requested the service of SPC volunteers at specific and strategic times to support that work.

During the trial, 40 operations were completed equating to 3735 volunteer hours in the field. All operations were supervised by NPWS SPC staff. As emphasised by NRC, all operations were conducted safely and "management of human safety and animal welfare are strengths of the program".

NPWS will continue the SPC program in line with NRC recommendations. Safety and risk management will remain primary considerations in all aspects of the program. This includes ensuring appropriate training regimes for staff and volunteers with regular review as the program develops. Comprehensive risk assessments coupled with monitoring and evaluation will continue to be conducted for each operation. The program will continue to be centrally coordinated to ensure consistency and maximise the effectiveness of integrating SPC operations with the overall pest management program. The evaluation identified that the SPC program had positive social outcomes including improved communications with neighbours and volunteers, increased community awareness, and support from Aboriginal and other community groups. This

commitment to effective communication will continue as the program continues to evolve. This will be particularly important as part of the process to identify other reserves where SPC may be undertaken in the future.

The three-year trial demonstrated how appropriately qualified and supervised volunteer shooters can safely contribute to NPWS integrated pest management programs to achieve conservation outcomes. It shows how government can collaborate with non-government organisations to achieve mutually beneficial goals in a public land management context, as well as demonstrating how NPWS can adjust to changing circumstances. NPWS looks forward to continuing to support this innovative initiative, as part of its commitment to managing biosecurity and protecting our precious environment.

NRC Recommendation	NPWS Response
<p><b>1. Strengthen safety and risk protocols</b></p> <p><i>The current safety and risk management steps remain in place to maintain volunteer safety and animal welfare standards, and are complimented by the following additional measures:</i></p> <p><b>a. Annual firearm accuracy tests</b> are conducted by all volunteers of the program, in line with current requirements for NPWS SPC staff. Opportunities to include moving target accuracy tests as part of volunteer testing should be explored.</p> <p><b>b. A process allowing NPWS to request specific volunteers based on capability and best fit</b> for different operations be developed with SSAA. Consideration should be given to volunteers' physical fitness and shooting capability to limit potential animal and human welfare concerns and maximise pest management benefit.</p> <p><b>c. Review procedures</b> regarding park visitation, closure of entire parks and reserves, the quantity of signage, staffing ratios and pre and post operation incident or issues alerts, and modify as appropriate based on risk assessment.</p>	<p><b>Supported</b></p> <p>This recommendation represents sound program and operational management principles.</p> <p>The SPC program employs a well-established and functional risk management procedure. This process undergoes regular review and responds quickly to identified needs.</p> <p>The qualification and currency process for qualified volunteers will be reviewed.</p> <p>Physical fitness is a major limiting factor for some operations given terrain and distances traversed. The SPC program will strengthen the process around fitness criteria for qualified SPC volunteer selection.</p> <p>To improve operational flexibility and responsiveness, the public notification requirement for all SPC operations will be reviewed to allow for more efficient operational planning and implementation. NPWS risk management procedures cover public notification requirements based on characteristics of the reserve and operation.</p> <p>Incident or Issue Alerts regarding SPC operations will only be required if an incident or issue arises during the operation.</p>

NRC Recommendation	NPWS Response
<p data-bbox="252 266 691 300"><b>2. Integrate Pest Management</b></p> <p data-bbox="252 333 783 501"><b>All volunteer ground shooting operations be strategically integrated with other pest management activities and only undertaken when the following criteria are met:</b></p> <ul style="list-style-type: none"> <li data-bbox="252 517 759 613">a. <b>Safety standards are maintained and strengthened in accordance with recommendation 1.</b></li> <li data-bbox="252 633 783 999">b. <b>They are sequenced with other techniques and can further reduce pest numbers to a level that other techniques cannot,</b> in particular: where population densities are either low or have been sufficiently reduced through large knock-down pest management techniques; and/or alternate management techniques do not exist.</li> <li data-bbox="252 1019 783 1218">c. <b>Pest type, densities and the threat they pose to native plants and animals have been assessed</b> to identify where operations are suitable and can provide the most benefit.</li> <li data-bbox="252 1238 770 1373">d. <b>Area accessibility,</b> vegetation density and topography are assessed in relation to suitability for effective ground-shooting.</li> <li data-bbox="252 1393 767 1527">e. <b>Tools and methods that enhance effectiveness are used,</b> such as targeting nocturnal pests at night with night vision technology.</li> <li data-bbox="252 1547 722 1644">f. <b>Size of shooting areas are adjusted</b> relative to pest animal type and population dynamics</li> <li data-bbox="252 1664 751 1760">g. <b>Operations are coordinated</b> with wider pest management control programs where possible.</li> <li data-bbox="252 1780 767 1915">h. <b>Annual Pest Management Operation Site Plans</b> are regularly reviewed, updated and adaptively managed.</li> </ul>	<p data-bbox="809 266 962 300"><b>Supported</b></p> <p data-bbox="809 333 1331 468">The recommendation represents sound pest management and operational principles, which were implemented during the three year trial.</p> <p data-bbox="809 501 1265 598">This practice will be continued and improved under the program going forward.</p>

NRC Recommendation	NPWS Response
<p data-bbox="252 264 746 360"><b>3. Centrally coordinate SPC program and provide dedicated funding</b></p> <p data-bbox="252 416 722 546"><b>The SPC program be centrally coordinated by a small dedicated SPC staff that directs services to priority regions as required.</b></p> <p data-bbox="252 566 775 797">Central coordination will ensure a continued high level of risk management, a single point of contact for SSAA volunteers, and that the program targets areas where supplementary ground-shooting is most beneficial.</p> <p data-bbox="252 817 612 882">The coordination should be implemented such that:</p> <ul style="list-style-type: none"> <li data-bbox="263 902 743 967">a. <b>protection of at risk assets</b> is a focus of operations</li> <li data-bbox="263 987 778 1117">b. <b>costs of central coordination and management are minimised</b> to the degree possible while maintaining quality and safety</li> <li data-bbox="263 1137 767 1335">c. <b>opportunities for SPC coordination staff to participate in other pest management programs</b> are identified and supported, subject to priorities and capacity.</li> </ul>	<p data-bbox="809 264 960 297"><b>Supported</b></p> <p data-bbox="809 416 1318 680">The SPC program will be centrally managed and coordinated to ensure consistency and dedication to the principles of the program, including a focus on protecting high priority assets and maximising cost efficiency for the required outcomes. All SPC staff will report to the SPC Coordinator.</p> <p data-bbox="809 701 1315 931">The SPC Coordinator will provide a single point of contact and will also ensure that SPC staff are utilised for other critical priority pest management programs, such as the Hawkweed program in Kosciuszko National Park, where capacity allows.</p>

NRC Recommendation	NPWS Response
<p data-bbox="252 1601 687 1635"><b>4. Provide Dedicated Funding</b></p> <p data-bbox="252 1673 778 1870">Separate funds be allocated for the SPC program to ensure that the program maintains its high quality and safety standards, while also maintaining core funding for broader pest management.</p>	<p data-bbox="809 1601 960 1635"><b>Supported</b></p> <p data-bbox="809 1673 1310 1738">OEH will allocate dedicated funding to the SPC program.</p> <p data-bbox="809 1776 1321 1901">Funding allocation will be subject to ongoing monitoring and periodic program reviews to ensure compliance with high standards and effectiveness.</p>

NRC Recommendation	NPWS Response
<p data-bbox="252 266 767 365"><b>5. Develop and publish a SPC park selection prioritisation methodology</b></p> <p data-bbox="252 400 759 499">Only parks and reserves that meet the following requirements should be eligible for SPC program services:</p> <ul style="list-style-type: none"> <li data-bbox="252 535 780 667">a. general assessment of their suitability for volunteer ground-shooting operations based on safety and practicality.</li> <li data-bbox="252 703 767 902">b. confirmation that they have met all the criteria outlined in recommendation 2, particularly that they reached a point in the pest management cycle where SPC would be most beneficial.</li> </ul> <p data-bbox="252 938 759 1137">All parks and reserves that meet the conditions outlined above are to be ranked and prioritised based on a risk-based prioritisation methodology to determine which parks and reserve receive SPC program services.</p> <p data-bbox="252 1173 767 1440">The NPWS pest and weeds team and SPC program should develop a prioritisation methodology based on asset protection and risk. In time, a similar prioritisation process should be expanded and applied across all pest management activities within all NPWS parks and reserves.</p>	<p data-bbox="809 266 959 297"><b>Supported</b></p> <p data-bbox="809 400 1289 499">This recommendation reflects sound pest management and operational principles.</p> <p data-bbox="809 535 1331 600">Not all NPWS managed reserves are suitable for ground-shooting operations.</p> <p data-bbox="809 636 1326 801">NPWS will undertake a transparent process to identify reserves appropriate for SPC operations, taking into consideration lessons learnt from the three-year trial.</p>

NRC Recommendation	NPWS Response
<p><b>6. Continue evaluation of night operations</b></p> <p><b>Night operations be monitored and evaluated by the Commission until June 2018 to further assess safety and effectiveness.</b></p> <p>The short period in which night operations have been conducted (since March 2016), combined with the cancellation of a number of night operations due to poor weather, has resulted in limited available data. Early results indicate that these operations have been highly successful in targeting nocturnal pests and can be done safely, but these results should be confirmed.</p>	<p><b>Supported</b></p> <p>Night operations will continue under the SPC program, conducted in accordance with vigorous risk management processes. NPWS is keen to continue to evaluate the effectiveness of these operations in conjunction with the Commission</p>

NRC Recommendation	NPWS Response
<p><b>7. Expand Communications strategy</b></p> <p>The current communications strategy be maintained and integrated with other NPWS communications.</p>	<p><b>Supported</b></p> <p>The continuation of the SPC program will require updated communication material for neighbours and other stakeholders. This will continue to be updated as the program continues to develop.</p>

NRC Recommendation	NPWS Response
<p><b>8. Conduct regular independent review</b></p> <p>An independent review of the SPC program be conducted every four years, with the first review to be finalised by December 2020.</p>	<p><b>Supported</b></p> <p>The SPC program will continue to be reviewed, to ensure safety and effectiveness are maintained at the high levels effected during the trial.</p>

NRC Recommendation	NPWS Response
<p data-bbox="252 232 785 297"><b>9. Establish outcome-based metrics supported by effective monitoring</b></p> <p data-bbox="252 344 767 479"><b>NPWS establish a set of measurable and reportable pest management performance metrics, supported by robust, cost effective monitoring.</b></p> <p data-bbox="252 501 785 902">The performance metrics should be outcome-based and have clear alignment with legislated objectives. NPWS management should be assessed against these performance metrics and held accountable for delivering pest management outcomes. It is recommended that SPC monitoring be integrated into broader pest management monitoring and therefore separate monitoring funds should not be required for ongoing SPC activities.</p>	<p data-bbox="809 264 962 297"><b>Supported</b></p> <p data-bbox="809 344 1313 680">As the SPC program continues, SPC operations will only be conducted in reserves where robust monitoring programs are already in place to evaluate the effectiveness of the pest management program. In most cases, this will be undertaken as part of the Saving our Species program, where protection of threatened species is the objective of the pest management.</p>