

**Submission
No 387**

**INQUIRY INTO MANAGEMENT OF PUBLIC LAND IN
NEW SOUTH WALES**

Name: Mr Rod McKelvey

Date received: 31/08/2012

The Director
General Purpose Standing Committee No. 5
Parliament House
Macquarie St
Sydney NSW 2000

31 August 1 2012

Re: Objections to proposal for volunteer shooting in national parks

Dear Sir,

Major issues:

- **safety of general public and neighbouring landholders**
- **safety and habitat disturbance of non-target species**
- **contrary to legislation and the spirit and purpose of national parks**
- **limiting park access to general public**
- **inefficiency of method compared to those now used**
- **possible preservation of some pests for future sporting targets**

I do not support the use of volunteer shooters in the national park estate, and I am especially concerned about the following issues.

Shooting in national parks is unsafe and inappropriate, other than under the control of the National Parks Wildlife Service (NPWS) in programs scientifically designed for the purpose of eliminating pest and feral species.

This new proposal has the potential to completely alter the control, management, and use patterns of the national park estate which is vested in the Minister for the Environment and the NPWS as the managing agency.

I understand that the proposal is to be administered by the Game Council, in conjunction with the NPWS, under the Game and Feral Animal Act, 2002. This will effectively make the NPWS the minor agency in this aspect of national park management, subsequently relegating an Act of Parliament, the National Parks and Wildlife Act, 1974, to a minor role.

Objective of the proposal

I believe that the objective of the proposal is unclear. NPWS is already implementing a pest animal control program, and shooting is proposed to complement parks' programs (Head of Parks Memo, 1 June 2012). The only way to deal with feral animals in reserves, State Forests, on adjoining LH&P Authority lands, and on adjoining private land, is to have properly coordinated, targeted plans, organized by professional staff.

The use of recreational shooters will not only be a threat to the public safety, but will also lead to scattering of animals. Feral animal control can never be considered a form of recreation. Closed seasons and quotas have no place in a genuine feral animal control programme because they need to be conducted at the optimum time to maximise the achievement of that objective.

The sole objective of shooting in national parks should be the control and elimination of pest and feral species, and that should include feral horses, which are causing irreparable environmental damage to the national reserve system.

Impacts on existing pest control programs

The NPWS has successfully developed many integrated pest control programs, using the best scientific evidence, and is implementing these using a wide range of techniques. The majority of pest animal control is by poisoning, trapping, habitat destruction, and where appropriate, aerial shooting.

This proposal will have an adverse effect on organised eradication programs, and pressure will be applied by hunters to stop the parks service using these techniques so as to allow them to undertake ground shooting, which could lead to the maintenance of a population for future hunting, rather than as a control program. For example, deer hunters usually take only one animal to ensure future “targets” will be available. It could also lead to the “seeding” of national parks from other feral populations to ensure a supply of target species.

Current programs are effective in controlling pest animals, whereas ground shooting is generally not considered the best way to control many pest species especially pigs, foxes, and rabbits. Ground hunting may also have the effect of dispersing animals onto neighbouring land. Unplanned shooting on reserves by neighbours could reduce the impact of well planned and managed control programs.

This proposal does not take into account sound pest animal control practices. Unless local managers have full authority over all shooting in the reserves, feral animal control will be less effective and cost the service a great deal more, especially in regard to supervising activities.

Finally, a NSW Parliamentary discussion paper produced in 2010, when this issue last came up, includes the following assessment:

Studies indicate that professional, targeted feral animal control is much more successful than recreational hunting; Game Council data indicates that the kill rate of feral animals by recreational hunters is very low (less than two feral animals per licensed hunter and less than one animal per hunting day in 2007-2008); Recreational hunters have a vested interest in retaining a sustainable population of feral animals to facilitate future hunting; Feral animal populations were, in some instances, established by hunters to facilitate hunting; There are safety issues associated with hunting in national parks and hunting conflicts with other recreational uses.

Promoting safe public recreation opportunities

Public safety should be of paramount concern when it comes to the use of firearms and other hunting devices in national parks. The New Zealand experience is one that should be seriously taken into consideration. It's bad enough when hunter kills hunter, but the loss of life of innocent park visitors is completely unacceptable.

Shooting is not an appropriate form of recreation in a national park, and "conservation hunting" is a meaningless term unless it is defined as part of a proper pest control programme. It should not include the taking of game for human consumption.

Legislation and Plans of Management

Plans of Management (PoMs) are legal documents and do not mention permitting hunting in reserves. PoMs cannot be amended to this degree without public consultation.

The NP&W Act should remain as the primary legislation. The Game Council could have a role in assessing and granting of licences, but it should be through a specific licence that is developed to meet NPWS requirements and for the distinct purpose of providing professional shooters for the purpose of national park management and elimination of feral animals. Use of such a licence would be illegal without formal approval of the NPWS.

Evidence of success and issues in other jurisdictions

Usually, numbers of animals destroyed are given as evidence of success of control programmes by recreational shooters. This is a blunt and insufficient instrument unless it can be measured in terms of ongoing impacts on feral populations and the success in achieving the objectives. Thirty to forty years of licensed hunting in Victoria has not controlled deer populations.

Detailed scientific monitoring should be carried out and programmes modified as appropriate.

Resources, training and Workplace Health and Safety (WHS) issues

NPWS staff resources are currently stretched, and further reductions in funding would have a major impact on their ability to deliver basic conservation outcomes. The proposal is very labour-intensive with the potential to divert resources. It should not be introduced with the expectation that staff (those remaining after funding cuts) will just add another task to their long list of jobs. Additional funding should be provided to enable proper supervision of programmes, provision of training and adequate controls.

The NPWS should be satisfied that shooters are professionally qualified in all aspects of removing feral animals, such as expertise with the weapon, ability to identify targets, and adherence to the objective of eliminating the feral animal population with as little other environmental impact as possible. No shooting should be allowed without NPWS approval and only then within feral animal control guidelines.

I believe that the WHS component of the proposal is of paramount importance and will need very careful consideration. It is essential that robust risk management systems are in place that would withstand WorkCover scrutiny.

A further issue is the safety of operators and managers of non-park infrastructure and adjacent landholders who gain access to their properties or in-holdings through parks and who will need to be made fully aware of any hunting activities.

In conclusion

Closing parks for the exclusive use of shooters, at the expense of all other park users, is against the spirit and purpose of national park reserves as defined by the Oxford Dictionary: "An area of countryside, or occasionally sea or freshwater, protected by the state for the enjoyment of the general public, or the preservation of wildlife".

It is also worthwhile remembering what Minister Parker said in Parliament just twelve months ago as referenced in Hansard.

<http://www.parliament.nsw.gov.au/Prod/parlment/hansart.nsf/0/4CBCB432C58DC3B9CA2578E00237C7F>

About this Item

Speakers	Speaker; Park Mr Ryan; Parker Ms Robyn
Business	Questions Without Notice, QWN

HUNTING IN NATIONAL PARKS

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Mr RYAN PARK: *My question is directed to the Minister for the Environment. Given that Fred Nile successfully went over the head of the Minister for Education to negotiate a reconsideration of ethics classes, what assurances can the Minister give that hunting in national parks will not be reconsidered in return for the support of the Shooters and Fishers Party for her Government's legislative agenda?*

Ms ROBYN PARKER: *How predictable. The policy of the New South Wales Government is clear: hunting in national parks is not permitted. I say that very slowly for the slow learner on the Opposition backbench. Parks receive over 35 million visits per year and we provide among other things facilities for visitors to our State, and I advise the member opposite that shooting is not compatible with visitations to our national parks. The member has wasted yet another question. For the benefit of those opposite I repeat that the policy of the New South Wales Government is clear: Hunting in national parks is not and will not be permitted.*

Thank you for the opportunity to comment.

Regards
Rod McKelvey