

**Submission
No 217**

INQUIRY INTO CROWN LAND IN NEW SOUTH WALES

Organisation: Federation of Hunting Clubs

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Hunters representing hunters

Submission to the 2016 Inquiry on Public Land



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Introduction

The Federation of Hunting Clubs Inc. (Federation) is an umbrella organisation of 36 hunting clubs representing hunters from all parts of New South Wales.

Federation members include: A.S.C Hunting Club Inc., All Seasons Hunting Club Inc., Australian Hunting Net Inc., Badgery's Creek Hunting Club Inc., Bowra Hunting Club Inc., Bulahdelah Hunting and Social Club Inc., Canobolas Hunting Club Inc., Cessnock District Hunting Club Inc., Clarence Valley Hunting Club inc, Field and Game Australia, Guyra Hunting Club Inc., Hastings Valley Hunting Club Inc., Hawkesbury Hunting Club Inc., Highlanders Hunting and Target Club Inc., Hills Hunting and Angling Club Inc., Hornsby RSL Rifle Club No. 385 Inc., Illawarra Big Game Safari Club Inc., IRSA Hunting Club Inc., Malabar Hunting Club Inc., Marconi Clay Target Club Inc., Marksman Hunting and Angling Club Inc., Nepean Hunters Club Inc., Newcastle District Hunting Club Inc., North West Hunting Club Inc., Northern Zone Hunting Club Inc., Orana Hunting Club Inc., Peninsula Firearms Academy, Safari Club International Down Under Chapter Inc., Shoalhaven Hunting Club Inc., Singleton Hunting Club Inc., Southern Riverina Hunting Club Inc., Hunters and Fishermen's Association of NSW Inc. 'Artemis', Three Rivers Big Game Hunting Club Inc., Valleybrook Hunting Club Inc., West Darling Outdoor Recreation and Hunting Club Inc. and Zastava Hunting Association Inc.

Our membership holds practical experience in pest management over many decades and across all game species and vertebrate pest species in Australia. As well, individual members hold professional qualifications and positions in veterinary science, law, wildlife management, biological sciences and education, among others. A number hold academic appointments at professorial and lecturer positions in universities, as well as current and former appointments to various government advisory boards including: the Game and Pest Board, the former Game Council of NSW, the NSW Animal Welfare Advisory Council, the Board of Safari Club International, the NSW Police Firearms Registry Stakeholder Committees.

The Federation is approved by the NSW Police Firearms Registry to operate and conduct firearms safety training and related activities and is recognised by the NSW Department of Primary Industries as a key stakeholder in hunting and game and vertebrate pest management.



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The Federation welcomes the opportunity to provide comment on the inquiry into public land, and will address each term of reference sequentially.

Extent of Crown land and the benefits of active use and management of that land to New South Wales.

The very notion of the term “Public Land” denotes that it be a space made available to the general public free of onerous governmental constraints and controls and a space to be utilised not locked away which seems to be a philosophy of some.

As an organisation consisting of member clubs who frequently use public lands in New South Wales for the purpose of recreational hunting we would strongly advocate against any action that would diminish access to those public lands for that purpose, we also recognise that our members have a general affinity for enjoying our natural environment in multiple forms including motorcycling, mountain bike riding, bushwalking, bird watching, camping, four wheel driving and mushroom gathering, hence we would extend that advocacy to all lawful recreational pursuits.

Our members have been regular users of NSW state forests since their opening for recreational hunting since 2008. An initiative that has seen multiple layers of benefit delivered to both the economy and environment of NSW.

The effectiveness of the State Forests model of hunting on public land has been demonstrated over 8 years of operation with safe and effective removal of large numbers of game and feral animals, as well as returning a positive public benefit. The public benefits of the State Forests model for hunting on public land for 2012-2013 were estimated at \$6.77 million. This exceeded net government funding of \$2.565 million, providing a net public benefit of \$4.45 million¹. This does not account for contributions to the economies of regional and remote NSW from individual hunters visiting those areas.

This is contrast to the current trial in National Parks, in which the interim evaluation conducted by the Natural Resource Commission states.

“By contrast, to date around \$3.6 million has been spent by NPWS on the SPC trial, including:

- *\$0.64 million (18 per cent) on program design and establishment costs*
- *\$0.32 million (9 per cent) on equipment*
- *\$0.25 million (7 per cent) has been spent on operational costs.*
- *Pre and post operations, NPWS Coordination staff, in-field monitoring and pre and post*

in-field monitoring costs represent \$1.78 million (around 50 per cent) of total expenditure to date”²

¹ Game Council of NSW. 2012-2013 Public Benefit Assessment, June 2013.

² Natural Resource Commission, Supplementary Pest Control Interim Evaluation, February 2016



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The report further states that current costs make it not sustainable.

*“The reductions in operational and monitoring costs have been significant over the first 18 months of the trial and should be commended. **However, fixed coordination staff costs continue to account for a significant proportion of trial expenditure at a level which would not be sustainable in a non-trial environment**”³*

Both models have shown effective partnerships between multiple government departments and Approved Hunting Organisations. However in terms of fiscal responsibility, It is clear to Federation members which model of recreational hunting on public land delivers most benefit to NSW and if expanded access for such a purpose is considered, the Federation would strongly recommend the current model operating in NSW state forests as best practice.

Adequacy of community input and consultation regarding the commercial use and disposal of Crown land.

Due to the significant amount of government organisations involved in the management of crown land, the Federation believes it is not possible to evaluate the adequacy of community input and consultation as a whole, as some of these organisations have been more adequate than others with regards to this matter. Instead the Federation would rather pass comment from its observation and involvement in community consultation in the past as to what makes for adequate community input and consultation.

Varied times and locations: An acknowledgement that those in the community that wish to attend public forums on such matters are not always in a position to take time off work or are unable to travel several hours to a location, as such a wider variety of times and locations when conducting such forums would ensure a diverse input is gained.

Authentic consultation: Community input and consultation should not be an exercise of ticking a box, unfortunately one of the most recent public consultations the Federation has attended it became quite clear that the above was the case. With impression being given by facilitators that key decisions had already been made and the meetings being stacked with those same supporters of key decisions at multiple locations. This is not adequate and makes a mockery of the importance of community consultation on such issues.

³ Ibid



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Most appropriate and effective measures for protecting Crown land so that it is preserved and enhanced for future generations.

The sustainable use of any of our natural resources is a balancing act. Balancing the desire to “preserve” and enhance our crown lands for future generations while allowing access and utilisation for our current generation. It is the Federation’s opinion that overall we currently do not have the balance right. This can be contributed, but not limited to the following;

- Cumbersome and overly complicated management structures.
- Vast differences of opinion in what Conservation is? And what is worth conserving?
- Poorly funded and administered crown land.

Overly complicated management structure:

When it comes the management of our crown lands, to the lay person it appears to be a maze of government departments and bureaucrats all vying for a bite of the cherry rather than working towards a common goal of the Conserving of our natural environment. Some of these organisations include

- Office of Environment and Heritage
- Dept of Primary Industries
- Natural Resource Commission
- NSW National Parks and Wildlife Services
- Local Land Services
- Forestry Corporation NSW
- Water Catchment Authority
- NSW water (impoundment catchments)
- Sydney water (impoundment catchments)
- Crown land trusts, and
- Local Councils as trustees

To further complicate the management of our crown lands, within those organisations you would have departments all conducting similar work for their ‘patch’ and individual employees within those organisations having a vested interest (i.e. ensuring their own job security) in advocating for more money or role/responsibilities to be allocated for their organisation. Which accentuates the following point.

It is the opinion of the Federation that after attending several public forums over the years held by the groups above on various topics that when it comes to real environmental work, it has become a case of too many chiefs and not enough Indians and more funding real in the field environmental work is needed.

It has also become apparent that because of this overcomplicated management that part of their main role has moved away from the core business of hands on management of our environment towards identifying a problem,



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and then writing a report into said problem that requires them to have more funding for their department. A self-licking ice cream in some regards.

Then there is the issue of duplication of roles and responsibilities when it comes to the management of crown lands, When examining this issue you need look no further than the two recent inquiries done by DPI and NRC into Biosecurity and Pest Management Review respectfully. The DPI inquiry was conducted first in 2015 and suggested the inclusion of biosecurity duties and directions into the Biosecurity act.

This act endeavoured to merge several older pieces of legislation under this one umbrella act.

The Biosecurity Act 2015 (Biosecurity Act) will repeal Part 10 of the Local Land Services Act 2013 (LLS Act) which provides the regulatory framework for the control of pest animals across NSW. Currently Pest Control Orders (PCOs) have been made under Part 10 of the LLS Act outlining arrangements for the control of the following declared pest animals: wild dogs, wild rabbits, feral pigs, feral dromedary camels, European red foxes and a number of locust species. Each PCO outlines the landholder's obligations with respect to the management of declared pests⁴

Then earlier this year the NRC called for submissions for its review of Pest Animal Management, and while they took a broader approach to some of the pest animals listed in the DPI discussion paper, both papers presented by DPI and NRC had overlapping concepts and ideas. This was further evident at the public forums held by NRC when they spoke about a recommendation to include similar control measures as the biosecurity orders mentioned in DPI's discussion paper, essentially unnecessarily duplicating enforcement powers with regards to the management of pest animals and plants.

The difference between the two reviews seemed to be that the NRC was calling for more funding to Local Land Services hence their significant attendance and show of support at the public forums in the way of Local Land Service employees, whereas the DPI biosecurity was suggesting a rationalisation of roles and a merger of acts.

It is the opinion of the Federation that such an inquiry by the NRC was premature or at the very least the DPI review should have had its scope broadened to include the issues that the NRC review had mentioned. Such duplication is waste of public resources that could be better allocated towards real environmental work.

As such the Federation would call for a wider investigation into the rationalisation of roles and responsibilities to cut the duplication and competition for funding which seems to have hindered this real environmental work being done.

⁴ http://www.dpi.nsw.gov.au/__data/assets/pdf_file/0005/587363/Discussion-Paper-Widespread-pest-animals.pdf



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What is preservation? What is worth conserving?

Unfortunately the definition for what preservation is, so wide and varied and subject to individual opinion that the notion of public lands being preserved for future generations becomes overly complicated.

One needs to look no further than a recent land swap between National Parks and St Ives Pistol Club to see there is a vast opinion on what is worth preserving. Approximately 1.2ha of National Park was leased to St Ives Pistol Club, this land although National Park was largely lantana and other weeds with no biodiversity significance. In exchange National Park received a larger portion of more diverse land elsewhere. Yet still some elements in society were concerned that this portion of land wasn't being preserved to their level of understanding of the concept.⁵

Some would say preservation means restricting access to areas, so that future generations can enjoy it, this concept begs the pertinent questions, who decides for how long that access is restricted? And what scientific basis is that decision based on?

It is the opinion of the Federation that the above mentioned approach is naïve and short sighted model. Preservation should include the utilisation of an area for recreational uses with practices in place like education and adequate funding for management that minimise any impacts. All stakeholders need to be included in the process of deciding and managing utilisation, as through ownership of an issue comes respect and responsibility for it. Largely the people that use public land for recreation do so responsibly with care and respect as they see themselves as custodians of that land that they conduct that recreation on.

Poorly funded and administered public land

Unfortunately we are now suffering from the effects of the creation of 100 odd new national parks in 1999 by then Premier Bob Carr without significant thought into the management of said increase. It was a simplistic idea by the government of the day to conceive that creating more National Parks would magically translate into tourism dollars that would then offset the cost of their management and preservation.

We now have a situation where it seems we have bitten off more than we can chew in terms of management of these National Parks, and created a snowball effect of neglect through increase of weeds, and pest animals and poor to no maintenance of tracks⁶ which in turn makes them less desirable tourist options leading to less patronage and income to support their management and so the downward cycle continues. Unfortunately it seems the National Parks have fallen under the preservation model of lock it and leave it, with no substantial revenue (other than access fees for some more popular areas) generated to adequately support their management.

⁵ <http://www.dailytelegraph.com.au/newslocal/north-shore/state-government-to-hand-125ha-of-national-park-to-pistol-club-a-great-win-for-target-shooters/news-story/f989572554eeebf19d4a967b2ebada76>

⁶ <http://www.smh.com.au/nsw/extra-nasho-royal-national-park-sydneys-neglected-southern-jewel-20140612-zs6d8.html>



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The government either needs to get serious about funding the management and effectively administering of these areas, or rationalise what we as state can effectively and efficiently manage as single purpose national parks. An inquiry into what other revenue streams can be sustainably gained from National Parks that would aid in the funding and maintenance of these areas is something that Federation would support.

The Federation strongly believes that in terms of the balancing act of public land, the balance is closer to being right in state forests when one compares the maintenance of said land vs national parks. It seems that by having a commercial element through the harvesting of forests by Forestry NSW, while still being utilised recreationally has provided that incentive for better management and maintenance.

Extent of Aboriginal Land Claims over Crown land and opportunities to increase Aboriginal involvement in the management of Crown land.

As an organisation made up of people who hunt, we share a mutual respect and affinity with the traditional owners being the Aboriginal people when it comes to the cultural practices of sustainable hunting. As such we would support opportunities that sought to better engage and utilise the knowledge of the Aboriginal people with regards to traditional land management practices.