



Sporting Shooters Association of Australia Victoria Ltd

Greater Alpine National Park.
Draft Management Plan, June 2014

August 2014

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Recommendations

The Sporting Shooters Association Australia (Victoria):

1. Recommend the activity of deer hunting be given prominence in the plan
2. Recommend to increase the deer hunting areas available and include extension to the Snowy River and Bogong sections
3. Support the removal of Broom and Blackberries
4. Recommends all deer species be included in huntable species
5. Support the removal of highly dispersive and invasive varieties of streamside Willows
6. Support the containment and/or removal of introduced Carp only
7. Recommend including cattle grazing and grazing trials in the Greater Alpine National Park at specific locations and under specific conditions
8. Recommend the term pest, when referring to deer, be amended to game animal unless there is a demonstrated population problem
9. Recommend scientific studies on deer are instigated as a high priority and this be included in the plan
10. Recommend the “no camping with firearms” proposal be removed from the plan
11. Recommend the proposal to reduce the hunting period by 10% be removed from the plan
12. Recommend hunting within the Recreation and Tourism section of the plan be given more prominence
13. Recommend an improved mechanism for consultation leading up to the preparation of Management Plans
14. Recommend a mechanism is introduced to allow deer hunters to destroy feral and vermin species in National Parks

About Sporting Shooters Association Australia (Victoria)

The Sporting Shooters Association Australia (Victoria) Ltd is a public company with 33,000 members.

Aims and objectives of Sporting Shooters Association Australia (Victoria) are:

- to promote and encourage competitive target shooting and practice shooting with a view to developing proficient and safe use of firearms
- to promote and encourage ethical hunting and field shooting and related ancillary activities
- to promote and advocate game fauna conservation and to promote a better understanding between members, land-holders, regulatory bodies, other interested groups and general public
- to promote and facilitate the development of knowledge of the history of firearms and ammunition development and design
- to promote and advocate the rights of firearms owners to legislative and regulatory bodies and to the general public
- to promote Country Centres throughout the State of Victoria for the purposes of carrying out any of the objectives of the Company

Key Points

1. The draft plan is far less comprehensive and detailed compared to preceding plans. For example, it covers a larger number of parks than do the 1996 management plans but in far less extensive fashion. The plan appears far more focused on policy and preferred outcome than on implementation. The lack of prescription may represent too much of a departure from the detail of previous plans and the number of goals.

2. As a consequence of the changed approach there is insufficient weight in the draft plan given to the substantial deer hunting activity which takes place within the National Park. The SSAA (Vic) membership includes an increasing number of deer hunters, with between 6,000 and 10,000 active participants (of a total of 27,000 in Victoria). It is estimated that a significant proportion of hunters travel to the Alpine Park twice annually to hunt deer. Anecdotal evidence suggests that deer hunters make up the majority visitor class to the Alpine Parks (other than Alpine resort users).

3. The SSAA (Vic) supports the proposal to extend the deer hunting area to include sections of Cobberas – Tingaringy and Wabonga (refer p68/ Map 5),

particularly given the high priority placed on the need to control deer numbers (p25), which are also undoubtedly high in the Snowy and Bogong National Parks.

Since ground shooting (*as compared to poisoning and helicopter pursuit*) is acknowledged as being the only practical method of controlling Samba Deer (*Parks Victoria workshop, Brim bank 13th /14th August 2014*) hunting should be introduced into most areas as soon as possible to address concerns over increased deer numbers (p25/p27). Non-hound deer hunting should be extended to include appropriate sections of the Bogging and Snowy National Parks as well as the extensions already proposed in the draft plan.

4. The SSAA (Vic) strongly supports i) the proposal to include all deer in the range of species allowed to be hunted in the Alpine Parks; and ii) all efforts to remove broom and blackberries from the Parks as part of an ongoing control program. A greater effort to remove blackberries than is currently being undertaken would be supported. Conversely, in the absence of scientific evidence, the SSAA (Vic) would not support the majority of stream-side willows being removed. Most willows are an invaluable aid in the prevention of river bank erosion and/or collapse. No native species offer anything approaching the bank stabilizing capacity of the willow. Indeed, there are instances of entire bank collapse following willow removal. However, it may be that some “seeding” willow types are highly invasive and therefore not desirable. Consequently, removal in such instances are supported.

5. The SSAA (Vic) has a large number of members who are freshwater fishermen. Consequently, containment of/and removal of non-native fish species (p36) would not be supported. While the elimination of Carp would be supported the removal of “game” fish such as Trout and Redfin would not. Trout and Redfin should not be deliberately restricted or eliminated from streams in the Parks.

6. Although not mentioned in the Draft Plan, there has been a recent cattle grazing trial in the Wonnangatta Valley. The SSAA (Vic) strongly supports cattle grazing as a means of reducing overgrowth grasses (fuel reduction) and maintaining access ways. Grazing trials should continue but be limited to mid-range forest areas where blackberry are increasingly over growing tracks and tall grasses, which in turn presents a serious fire hazard in summer. Any grazing trial would need to take account of the estimated carrying capacity of the trial area, and ensure that animal numbers were sufficient to make a trial meaningful.

7. Continued reference to deer as a “pest” (p25/p27 in the draft plan) is of great concern. More correctly, all deer are afforded full protection as protected wildlife *game*. Deer may only be harvested by persons with a game licence and appropriate firearms, within legally designated areas. Despite anecdotal evidence suggesting that Sambar Deer is increasing in range and density, it has yet to be

established. Once over-population or significant environmental damage *has* been clearly demonstrated, deer could be regarded as a 'pest' in specific locations. In such circumstances an 'Authority to Control Wildlife' (ACTW) document is required to be approved prior to animal destruction. This process is identical to that for a farmer wanting to destroy say, a Kangaroo or native birds impacting on his livelihood. Again, until the issuance of an ACTW, the animals are afforded full protection.

Ultimately, having been resident in Australia for over 150 years deer are now in effect 'indigenised' and to continue to regard them as pests is both legally incorrect and unhelpful. Hence the SSAA (Vic) strongly suggests that deer be referred to in the document as a protected game species.

8. The SSAA (Vic) fully concurs with the statement found on page 32 to the effect that "scientific data about the population of deer in Eastern Victoria is very limited." Further, it is impractical to attempt management of deer without pertinent scientific information. Consequently, as a priority in the management plan a major study of deer in all their aspects in Victoria should be undertaken as a matter of some urgency.

The SSAA (Vic) strongly opposes any proposal to designate 10 areas (or any area) to be a "no camping with firearms areas" (p68). The concept is discriminatory against shooters and offers no fair and reasonable rationale as a justification. There is no "risk" basis for such a move arising from statistics. In fact statistics show clearly that hunting activities pose a negligible risk to non-participants. Data from the National Coronial Information System show 9 non-intentional firearms-related deaths from hunting over a 12-year period from 2000 to 2012. These fatalities involved members of the hunting party. None of the fatalities involved non-hunters or other recreational users of National Parks.

If the proposal originated because of "perceptions", then other National Park users are in need of education regarding firearms usage and the risk to other parks users. The SSAA (Vic) recommends the proposal be withdrawn from the draft plan.

9. The draft plan proposes a one month reduction in the allowed deer hunting period with closure to hunting being proposed on the 15th March rather than the currently on 15th February. No justification is given for this proposal. The SSAA (Vic) is not aware of any complaint or incident which could have led to such a proposal; nor is there any material in the "companion document" which supports it. Clearly it is a major contradiction. On the one hand, deer are listed as a high-priority threat that needs to be controlled (p25) and for which a Deer Action Plan is to be prepared (p27). On the other hand the only known control measure - ground- based hunting - is proposed to be *reduced* by 10%. The logic of the

proposal is not evident and accordingly it is recommended that the proposal be removed from the draft plan.

10. It is noted with concern that it is not until Section 8.3 (p67) that mention is made of deer hunting in the Recreation and Tourism segment (Section 8/p61). All other tourist activities are extensively mentioned prior to that. It reinforces the SSAA (Vic) concern that deer hunting is being given disproportionately low prominence in this draft - despite the SSAA (Vic) view that i) hunters are the most frequent users *of their sections of the park* and ii) hunting is a legitimate activity. The Victorian Government recently received an independent report showing that hunting contributed \$439m per annum to the Victorian economy. Arguably half of this figure could be attributed to deer hunting as it now has the highest number of licence holders (some 27,000) and is the fastest growing hunting activity in the State. Hunting as an economic contributor to Victoria is now second only to horse racing. Clearly, significant economic activity is generated through hunting in these National Parks, and it follows that not only should it be given high prominence in this draft plan, but also in all other publicity material for the Parks.

11. The SSAA (Vic) is concerned that it has not had the benefit of any comprehensive consultation or discussion on this draft plan prior to its release. Neither is the SSAA (Vic) aware of any other bodies being consulted. Further, the SSAA (Vic) has no input into the ongoing management of these National Parks. There is no representation on the Parks Advisory Committee, no representation on the Tracks Closures or any other committee. It is requested that an opportunity be created for this organization to have ongoing constructive input into management of the Greater Alpine National Parks.

12. Finally, the SSAA (Vic) is of the view that the present policy - which does not allow a deer hunter to destroy a feral or vermin species on sight - is unreasonable because it would be an aid to pest control if deer hunters were permitted to undertake culling. It should be legal for a deer hunter to be able to destroy (opportunistically) any rabbit, fox, cat, wild goat, wild pig, wild cattle or wild dog that he or she may come across while hunting in the Park. The SSAA (Vic) recommends such amendments as necessary be made to legalise opportunistic feral pest and vermin destruction.