



Sporting Shooters Association of Australia
Victoria Ltd

Submission

Inquiry into the Control of Invasive Animals on Crown Lands

for the

Environment, Natural Resources and Regional Development
Committee

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1. ABSTRACT

The Sporting Shooters Association of Australia (Victoria) Ltd (SSAA Victoria) submission addresses the Environment, Natural Resources and Regional Development Committee's *INQUIRY INTO THE CONTROL OF INVASIVE ANIMALS ON CROWN LAND*.

The inquiry seeks to establish the benefits of Parks Victoria (PV) and other agencies such as the Game Management Authority's use of community hunting organisations and individuals in the control of invasive animals, including but not limited to:

1. *assessment of the biodiversity outcomes, community safety and limitations of the trial conducted by Parks Victoria on control of deer populations in a national park;*
2. *consideration of the application of these types of programs for other invasive animal species in partnership with Crown land managers; and*
3. *assessment of the relative costs and benefits, financial or otherwise, of other forms of pest control in national parks.*

In its submission, it is the position of the SSAA Victoria that, *in summary*:

- i. in relation to Terms of Reference item 1, i) biodiversity outcomes have been positive, ii) there are no community safety issues, and iii) the major limitation to the trial relates to species controlled, program management considerations, volunteer/Parks Victoria resourcing and environmental challenges;
- ii. in relation to item 2, there is already a history of successful programs aimed at controlling invasive animals other than deer. There continues to be considerable scope to expand these control programs; and
- iii. in relation to item 3, there is a significant number of benefits to be gained, both financial and non-financial, with the only cost incurred being the funding allocation required.

Consequently, PV and other agency programs which use community hunting organisations and individuals in the control of invasive animals should be continued.

Further, it is also the position of the SSAA Victoria that:

1. *the status of deer as game species must be continued;*



2. *further research into deer population density, biology and the behavioural drivers which affect breeding and migration needs to be undertaken;*
3. *access by hunters to Crown land, including the permission to destroy pests such as rabbits, foxes, goats, pigs and cats in National Parks and State Game Reserves needs to be increased; and*
4. *hunters should have permission to use sound moderators when hunting on Crown land.*



2. BACKGROUND

2.1 Overview

The Sporting Shooters Association of Australia (Victoria) Ltd (SSAA Victoria) is a public company with 36,000 members whose mission includes promoting the rights of firearms owners and advocacy to government, regulatory bodies and the general public.

The SSAA Victoria has a Memorandum of Understanding (MoU) with Parks Victoria (PV) for a Conservation and Pest Management (CPM) program, ratified in July 2012. The aim of the MoU is to accredit volunteer members to assist in approved PV pest animal control programs on public land, under the direct management of PV (refer to Appendix A for a current list of programs).

The first pest management program with PV began in 2003. Since that time SSAA Victoria has worked with PV to control a number of animal species within metropolitan and regional parks in Victoria.

Under the terms of the MoU the SSAA Victoria, with the approval of PV, plans, coordinates and delivers the control programs. They are designed to maximize positive biodiversity, 'good neighbor' outcomes and reduce threats to key conservation values in parks.

The SSAA Victoria submission addresses the Environment, Natural Resources and Regional Development Committee inquiry into the control of invasive animals on Crown land.

The terms of reference for the inquiry are:

The inquiry will report into the benefits of Parks Victoria and other agencies such as the Game Management Authority's use of community hunting organisations and individuals in the control of invasive animals on Crown land.

The inquiry will include but not be limited to the following:

- 1. assessment of the biodiversity outcomes, community safety and limitations of the trial conducted by Parks Victoria on control of deer populations in a national park;*
- 2. consideration of the application of these types of programs for other invasive animal species in partnership with Crown land managers; and*



3. *assessment of the relative costs and benefits, financial or otherwise, of other forms of pest control in national parks.*

The SSAA Victoria submission addresses the terms of reference and the current PV program, supported by SSAA Victoria volunteer members.

2.2 More about SSAA Victoria

The aims and objectives of the SSAA Victoria are to:

- *promote and encourage competitive target shooting and practice shooting with a view to developing proficient and safe use of firearms;*
- *promote and encourage ethical hunting, field shooting and related ancillary activities;*
- *advocate for game fauna conservation and promote understanding between SSAA Victoria members, land-holders, regulatory bodies, other interested groups and the general public;*
- *promote and facilitate the development of knowledge of the history of firearms and ammunition development and design; and*
- *promote the rights of firearms owners and advocate to government, regulatory bodies and the general public.*



3. TERMS OF REFERENCE ADDRESSED

3.1 Assessment of Issues Around the Trial Conducted by Parks Victoria

3.1.1 Assessment of the biodiversity outcomes

The SSAA Victoria has a proven track record of successful deer control programs in a number of national parks and nature conservation reserves throughout Victoria. These programs have been conducted over a number of years and have been carried out to protect both flora and fauna. Whilst some programs have been conducted specifically to protect fauna, such as the habitat of lyrebirds in the Dandenong Ranges National Park, other programs have been conducted to enhance the success of revegetation projects undertaken with the help of other conservation groups. Examples of biodiversity outcomes achieved are contained in Appendix B.

The success of these programs relies on the commitment of SSAA Victoria volunteers to controlling invasive species in parks, thereby protecting flora and fauna as part of the overall conservation effort.

Also, PV should be acknowledged for its involvement in the CPM program and its support of biodiversity outcomes within parks under its control.

Further, a diverse range of established and innovative technologies has been used in the program. Modifications have also been adopted as required to ensure that the focus on biodiversity outcomes is maintained. For example, with the Werribee Mansion program spotlighting has been superseded by the adoption of infra-red night vision equipment, while with the deer programs, spotlighting has been superseded by the use of thermal imaging.

3.1.2 Community safety

The safety of the community and individuals involved in these programs is of paramount importance to both the SSAA Victoria and PV.

The SSAA Victoria with the approval of PV has established an accreditation course for volunteers participating in its CPM programs. All member volunteers are required to undertake and pass this course prior to being granted access to both the CPM program and involvement in projects in national and State parks within Victoria.



The accreditation course comprises four key theory topics and a practical component. The course has been designed to provide knowledge and skills to volunteers to ensure safe firearm handling and competence in navigation within forest and park environments, to ensure successful and safe outcomes for the program.

In addition to the accreditation course all projects are covered by an Operation Plan incorporating a Standard Operating Procedure (SOP) and Job Safety Analysis (JSA). They are jointly written by the SSAA Victoria and PV to identify the risks involved in specific projects and the control measures required to be implemented prior to commencement.

As part of this process, volunteers are required to attend briefings at both the start and conclusion of projects. Briefings are used to identify hazards and risks which may present after the writing of the SOPs and JSAs, for example, fallen branches, prohibited areas and the like.

Part of an Operation Plan identifies the means by which the public accesses a park and the measures taken to limit that access during a project. Control measures include locked gates, signage and volunteer patrols of tracks and access points. The objective of these control measures is to ensure the safety of all people who have access to a particular park.

It is particularly important to note that in the time that the CPM program has been operating, there have been no consequential injuries, accidents or incidents involving SSAA volunteers, PV personnel, land holders or members of the public.

3.1.3 Limitations

The major limitation to the success of CPM projects targeting deer is the nature of the species itself. For instance, deer are elusive animals which, outside Australia, have evolved with a large number of natural enemies. Consequently, deer have acute hearing, eyesight and sense of smell. They also tend to roam and are rarely found in the same spot over time, though they are also given to residing within set but large areas.

The only way to successfully target deer is to be prepared to cover large areas and to schedule programs at regular intervals. Experience has shown this approach to be best in controlling deer numbers due to two key factors. Firstly, volunteer hunters become familiar with the areas used by deer; and secondly, success is proportional to time spent hunting.



However, there are other limitations to success in deer hunting which result from community expectations of access to parks, and the commitment of park administrators to provide that access to the public.

Other factors which have impacted the success of previous programs include:

- weather conditions, including extremes of high or low temperature and bushfire or flood,
- the time allocated to the conduct of the trial,
- PV staff and volunteer resourcing,
- seasonal factors which impact the flora or fauna within a park,
- cropping, spraying or sowing of crops by neighbours, and
- times of high activity within a park, i.e. summer holidays, Easter, school holidays and camps.

The coordination of CPM programs must consider and be prepared for the above factors to ensure maximum positive outcomes.

3.2 Consideration of other invasive animal species

The SSAA Victoria first began its CPM program by providing member volunteers to help control species other than deer, on both public and private land.

The CPM accreditation and program are based on the Flinders Ranges goat control program administered by the SSAA South Australia with input from the national SSAA body.

The Victorian trial program began in November 2003 when the SSAA Victoria provided approximately 50 accredited members to help control goats in the Murray Sunset National Park. Since then in excess of 4500 goats have been taken from that park with flora and fauna benefitting from the reduction in goat numbers.

Other species targeted in CPM projects have included (other than deer), rabbits, foxes, cats, hares and pigs. CPM projects have been run in parks located in the outer suburbs of Melbourne and throughout rural Victoria.

Experience with these early projects highlighted the need to consider the safety of the public and the safety of the individual hunter when undertaking CPM. Consequently, the SOP and JSA were introduced to ensure that both the correct command procedure was followed and that safety was maintained.



3.3 Assessment of the relative costs and benefits

The following assessment is based on having conducted the CPM program over the past 12 years. The benefits and costs are listed below, including comparison to other forms of control:

- i. CPM has saved the Victorian government approximately \$1.2 million since commencing, by providing 23,750 volunteer man-hours to undertake projects (based on \$50 per man-hour (Appendix C));
- ii. contributed to the local economies of rural towns through the purchase of local products and services in those communities;
- iii. supported the biodiversity objective in helping to protect the native flora and fauna by reducing the impact of invasive animals;
- iv. reduced the reliance of Government departments on the use of poisons, fumigants and 1080 to control invasive animals;
- v. reduced the reliance on and therefore high cost of expensive alternatives for control of populations, i.e. trapping or burrow ripping;
- vi. reduced the use of PV resources to protect existing flora and revegetation of damaged flora;
- vii. reduced erosion which occurs with increased invasive animal populations. The reduction of erosion has a twofold benefit, i) improving the quality of water entering the waterways and wetlands, and ii) reducing the degradation of the environment;
- viii. improved public perception, *anecdotally*, of both PV and the Government for taking an active role in promoting biodiversity outcomes within the State.

The only cost incurred by the CPM program is the funding allocation required from 2012 onwards. Labour, overheads, equipment, consumables and logistic support all come at a cost. However, the benefits from the investment are demonstrable.



4. RECOMMENDATIONS

On the basis of review and assessment, it is the position of the SSAA Victoria that:

1. Deer must remain a game species. It should not be assumed that the reclassification of deer to pest species would automatically reduce their numbers significantly. For example, the recent change to the Wildlife Act to allow primary producers to shoot deer on their properties without a game licence has not served to reduce deer numbers.
2. Licensed hunters should be given greater access to national parks, state parks and state forests to help control deer numbers. Generally, more Crown or public land should be open to recreational hunting because the habitat provided in these areas is the source of migration of animals onto private property and onto public roads. Further, given that i) the 2014 Hunting and Game Management Action Plan identified that recreational hunters contribute \$439 million annually to the State's economy, and ii) hunters are firearms owners approved by Victoria Police and accredited by the Game Management Authority, with licences to hunt deer in national parks, it is illogical that licensed game hunters are not permitted to destroy pests such as rabbits, foxes, goats, pigs and cats in national parks. Coincidentally, there should also be greater access for hunting within State game reserves, and in addition, the destruction of pest species within reserves should be permitted.
3. Currently within the Alpine National Park, hunting is restricted to Sambar deer. This restriction should be lifted to allow for the hunting of not only other deer species but also pest and vermin species, given that the problem with wildlife in the Park is not limited to just deer. Such a change would be a positive step towards the control of invasive animals and the biodiversity outcome for the Park (refer Appendix B).
4. Overall, anecdotal evidence shows that there is a proliferation of native wildlife and it is having a negative impact on i) the State's ability to produce primary foodstuffs, and ii) road accidents. Consequently, the current inquiry should be expanded to include investigation of the impact of native wildlife on primary producers and additionally, road accidents.
5. The SSAA Victoria has historically put itself and its members forward to assist in government programs for the control of pest animals, regardless of whether they be *introduced* or *native* species. Given the success of the current CPM program with PV, the SSAA Victoria should be afforded the opportunity to continue in assisting with such programs. These programs deliver quantifiable results which can only improve with commitment and support from the Victorian government and its associated departments (refer Appendix C).



6. The inquiry should also review the current restriction on sound moderators (suppressors/ silencers). Outside of Australia, moderators are seen as beneficial and their use is common. The benefits of sound moderator use include:
- reduced hearing loss among hunters. It is common practice in hunting situations for shooters to forego the use of hearing protection in order to pick up on ambient noise;
 - reduced disturbance and stress to pack animals, particularly where vermin/pest control activities are undertaken after dark;
 - reduced noise pollution and stress to neighbours in areas of habitation; and
 - reduced recoil and consequent firearm movement resulting in greater accuracy and reduced risk of unintended damage.

Since the introduction of the *Firearms Act 1996*, the possession, carriage and use of sound moderators are authorised only to non-prohibited persons who hold the relevant permission granted by the Chief Commissioner of Police. Since 1996, there have been no amendments to the legislation governing moderator regulation. While the Act does not provide direction on the circumstances of how or to whom a permit is issued, other than to a non-prohibited person, Licensing and Regulation Division Victoria Police has published eligibility advice for the issue of moderator permits.



5. CONCLUSION

The effective management of any animal species is dependent on knowledge and understanding. Unfortunately, there is a dearth of current literature on deer species within Victoria.

Given that an objective of the inquiry is to realise effective control of deer species, there will need to be a commitment to greater research. This research will need to address areas such as population density, biology and the behavioural drivers which affect breeding and migration.

The uncontrolled breeding of deer within this State is consequential on their having no natural predator to help control numbers. It then follows that humans must control their population before it adversely impacts native flora and fauna.

The effective control of deer can be achieved with management practices and programs specifically targeting deer *while* importantly, i) maintaining their status as a game animal, ii) contributing to the economic benefit of Victoria, and iii) maintaining game hunting opportunities. If deer are declared a pest species and removed from the game list, the potential reduction in the annual economic contribution by hunters to the rural community is likely to be significant.

Improved management practices will need to include allowing greater hunter access to Crown land.



6. APPENDICES

Appendix A Summary of CPM projects

PROJECT NAME	PROPERTY LOCATION	OWNER	DATE FROM	ANIMALS TARGETED
You Yangs RP	You Yangs State Park	Parks Vic	Aug-06	Feral Goats
Plenty Gorge Park	Plenty Gorge Regional Park	Parks Vic	Jun-06	Wild Pigs, Foxes
Murray Sunset NP	Murray Sunset NP	Parks Vic	Nov-03	Feral Goats
Inverleigh	Inverleigh	Parks Vic	Oct-10	Foxes, Cats
Barmah NP	Barmah	Parks Vic	Jan-06	Wild Pigs
Braeside Park	Braeside	Parks Vic	Jan-07	Rabbits, Foxes, Cats
Boosey Creek	Tungamah	Parks Vic	May-10	Foxes
Kinglake NP	Kinglake, Mt Piper	Parks Vic	Nov-07	Goats
Little Desert NP	Dimboola	Parks Vic	Jun-07	Goats, Deer, Foxes
Cape Otway	Otway Ranges	Parks Vic	Dec-10	Rabbits, Foxes, Cats
Serendip Sanctuary	You Yangs	Parks Vic	Jun-07	Rabbits, Foxes, Cats
Jarvis Creek	Tallangatta	Parks Vic	Oct-09	Goats
Dandenong Valley Park	Glen Waverley	Parks Vic	Mar-12	Foxes
Point Nepean	Mornington Peninsula	Parks Vic	Sep-12	Foxes
King Lake NCR	King Lake	Parks Vic	Jan-11	Goats
Numurkah Reserve	Numurkah	Parks Vic	Oct-10	Foxes
Mt Mittamatite	Corryong	Parks Vic	Jan-06	Goats
Powers Lookout	Whitfield	Parks Vic	May-13	Goats
Barry Mountains	Myrtleford	Parks Vic	Sep-13	Foxes
Werribee Mansion	K Road, Werribee Sth	Parks Vic	May-13	Rabbits, Foxes, Cats
Bogong High Plains	Alpine National Park	Parks Vic	Nov-15	Deer
Switzerland Ranges	Switzerland Ranges	Parks Vic	Apr-07	Rabbits, Foxes, Cats
Cathedral Ranges	Taggerty	Parks Vic	Aug-13	Goats
Providence Ponds Reserve	Princes Hwy Fernbank	Parks Vic	Jun-13	Foxes
Mt Napier State Park	Mt Napier, Macarthur	Parks Vic	Feb-14	Goats
Dandenong Ranges NP	Mt Dandenong	Parks Vic	Nov-13	Deer
Point Cook Coastal Park	Point Cook Rd	Parks Vic	Apr-14	Rabbits and Foxes
Lerderberg Gorge SP	Bacchus Marsh	Parks Vic	May-14	Pigs, Goats
Mt Buffalo NP	Mt Buffalo	Parks Vic	May-14	Goats
Cobrawonga Island	Dead River Track, Boosie	Parks Vic	Oct-09	Foxes and Rabbits
Boole Poole	Metung, East Gippsland	Parks Vic	Jul-14	Pigs
Warramate Hills	Gruyere	Parks Vic	Oct-15	Deer
Great Otway NP	Anglesea	Parks Vic	Mar-15	Foxes
Wilson's Promontory	Yanakee	Parks Vic	Aug - 15	Hog deer
Yellingbo NCR	Yellingbo	Parks Vic	Nov-13	Deer



Appendix B

Biodiversity Outcomes Achieved in Specific Parks

Area	Animals targeted	Biodiversity Outcomes
Dandenong Ranges NP	Sambar Deer	<ul style="list-style-type: none"> • Improvement in the habitat for Lyrebirds • Reduced erosion from game trails
Murray Sunset NP	Feral Goats	<ul style="list-style-type: none"> • Improvement in habitat for Mallee Fowl • Re-establishment of native flora in sensitive areas • Reduced erosion
Werribee Mansion	Rabbits, Foxes, Cats	<ul style="list-style-type: none"> • Protection of heritage listed trees and plants • Protection for the States rose garden and orchard • Reduced baiting • Protection of possums, native rats and birds
Point Cook Coastal Park	Rabbits, Foxes	<ul style="list-style-type: none"> • Reduced degradation of area from burrowing • Protection of Indigenous areas of significance • Protection of birds in the Ramsar sites
You Yangs Regional Park	Goats, Foxes	<ul style="list-style-type: none"> • Reduced erosion and degradation • Reduced spread of introduced flora • Protection of native flora and fauna
Alpine National Park (Bogong High Plains)	Sambar deer	<ul style="list-style-type: none"> • Protection of the alpine sphagnum bogs (peatlands)
Wilson's Promontory National Park	Hog deer	<ul style="list-style-type: none"> • Protection of Indigenous areas of significance • Protection of native flora • Reduce grazing by Invasive species



Appendix C

Summary of animals destroyed by year.

Year	Feral Cats	Feral Pigs	Rabbit	Hares	Feral Goat	Fox	Deer	Hunters No Off	Volunteer Hours
2003 - 2009			56	2	1808	45		476	8460
2009 - 2010	1		668	2	409	51		99	2280
2010 - 2011	2	11	762	10	546	20		61	1883
2011 - 2012	2	28	841	30	880	98	6	108	2180
2012 - 2013	2	2	167	15	806	57	4	81	1617
2013 - 2014	10	51	1637	59	264	56	5	267	4101
2014 - 2015	4		1776	22	20	7	44	424	2482
2015 - 2016	4	9	383	5	86	2	62	107	877
2016 - 2017							44	49	308
TOTALS	25	101	6290	145	4819	336	165	1672	24188