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1. ABSTRACT

The Sporting Shooters Association of Australia (Victoria) Ltd (SSAA Victoria) submission addresses the Victorian Environmental Assessment Council (VEAC) Central West Investigation Draft Proposals Paper. The Association also made a submission in relation to the original VEAC Central West Investigation.

The Association recognises the complexity of the investigation and the challenges VEAC faces in making recommendations given the competing interests involved. However, the Association considers the terms of reference and legislative framework that VEAC must work within pre-ordains certain recommendations.

VEAC has been driven by the specific terms of reference for this investigation and its legislation to look at whether the protected area system (also known as the conservation reserve system) is representative of the natural biodiversity of the areas. Most of the public land in this region hasn’t been reviewed by VEAC and its predecessor organisations for 30 years. This means that unlike much of the rest of the state, many ecosystems are under-represented in the protected area system.¹

The Association rejects the premise that the only way to “protect” public land is to create national parks. The fact that the areas of state forest in the review area maintain such high conservation values, as identified in the VEAC investigation, confirms that properly managed public land can support multiple use activity and still protect biodiversity and conservation values.

It is the position of SSAA Victoria that, in summary:

1. Most of the draft discussion paper recommendations, if adopted, would seriously reduce recreational hunting opportunities for members of the Association and the broader hunting community and are therefore not supported.
2. The investigation has failed to adequately identify and evaluate the cultural, social and economic values relating to hunting on public land and therefore has not given adequate consideration to these activities.
3. The investigation has incorrectly described hunting as a being a “consumptive use” activity in a similar manner to logging or mining, whereas it is a recreational and nature conservation activity.
4. There is no evidence to suggest that the Council has considered the Victorian Government Sustainable Hunting Action Plan 2016-2020.
5. Clarification of the legal status of the Mt Cole game sanctuary is supported. However, the assertion that such clarification will lead to significantly increased deer hunting opportunities is incorrect in the context of other recommendations which severely restrict all hunting opportunities.

¹ VEAC Central West Investigation Draft Proposals Paper. August 2018. Foreword Pg.1
2. BACKGROUND

2.1 Overview

The Sporting Shooters Association of Australia (Victoria) Ltd (SSAA Victoria) is a public company with 38,000 members. Its mission includes promoting the rights of firearms owners and advocacy to government, regulatory bodies and the general public.

Approximately eighty percent of its members hunt, with SSAA Victoria advocating on their behalf on hunting-related matters. Hunting activities include feral pest control on private and public land and hunting for game species during declared open seasons. SSAA Victoria also has a Memorandum of Understanding (MoU) with Parks Victoria (PV) for a Conservation and Pest Management (CPM) program, ratified in July 2012. 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 maximise positive biodiversity, ‘good neighbour’ outcomes and reduce threats to key conservation values in parks.

As hunters, SSAA Victoria members are directly affected by reviews of public land use where a change in land classification could either preclude or allow hunting to occur.

The SSAA Victoria submission addresses the Minister for Energy, Environment and Climate Change’s VEAC Central West Investigation Draft Recommendations.

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. **DRAFT PROPOSALS PAPER ADDRESSED**

3.1 **Effects of the Draft Proposals**

3.1.1 **Hunting**

State forests currently provide most public land hunting opportunities in Victoria. Generally, both game and pest species may be hunted in state forests. It caters for a broad cross-section of hunters and allows for a wide variety of hunting methods and target species to be pursued. The hunting that is permitted in some national parks only allows for deer hunting by stalking.

Most of the public land available for hunting is in the east of the state. There are few opportunities for hunters to hunt on public land in the central and western areas of the state. The major areas that are available are contained in the Central West Investigation area. The majority of the draft discussion paper recommendations, if adopted, would seriously reduce recreational hunting opportunities for members of the Association and the broader hunting community in the investigation area and consequently, the entire central and western areas of the state.

It is the Association’s position that VEAC has significantly underestimated the negative effects the draft recommendations will have on hunting opportunities and hunters’ ability to partake in a long established, legal and government supported recreational activity. Comments in the Draft Proposals Paper show a clear lack of understanding of those impacts. For example, the introduction states: “VEAC is aware that there is some concern in the community about whether their access to public land will be affected by the recommendations of this investigation, if accepted by government. This report is clear about which activities will be affected by the draft recommendations, and they are fewer than is often thought.”

While VEAC might consider that there are few activities affected, the reality is that many activities will be adversely affected. Hunting is the main area of concern for SSAA Victoria and is one of the most adversely affected by the recommendations. Areas available for hunting will be reduced from the current 89,278 hectares of state forest to 10,180 hectares. That loss is over 79,000 hectares available for hunting. These figures give an objective assessment of the impact of the recommendations and demonstrate that community concerns held about access to public land are well founded. Adopting VEAC recommendations would have a significant negative effect on hunters’ cultural and social amenity and their ability to partake in healthy outdoor pursuits.

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2 Sustainable Hunting Action Plan 2016-2020
Authorised by the Department of Economic Development, Jobs, Transport and Resources. 1 Spring Street, Melbourne 3000. ISBN 978-1-925532-28-9 (print) ISBN 978-1-925532-29-6 (pdf/online)SHAP. Minister’s Foreword

3 VEAC Central West Investigation Draft Proposals Paper. August 2018. Foreword Pg.1

4 VEAC Central West Investigation Draft Proposals Paper. August 2018. Summary Table Pg.7
VEAC’s assertion in the foreword that “The recommended revocation of the game sanctuary at Mount Cole will improve deer hunting opportunities”\(^5\) is technically correct for that area and the recommendation is supported. However, the additional deer hunting opportunities provided by the revocation of the sanctuary do not go anywhere near to offsetting the other significant losses of deer hunting areas. Hunting for pest species has always been permitted in that area, consequently there is no increase in overall hunting opportunity. If VEAC considers the revocation to be a significant offset, it shows a fundamental misunderstanding of what hunters need and expect.

The provision by VEAC to allow for animal control programs in the proposed new parks does not provide recreational hunting opportunities. VEAC should not confuse the two issues. If VEAC considers that this provision somehow mitigates the negative impacts of the draft recommendations on hunters it again shows a fundamental misunderstanding of hunting issues.

### 3.1.2 Other recreational activities

“Four wheel driving, trail bike riding, mountain biking, horse riding, car rallies, camping, bee keeping, and dog walking in specific designated sites, can all be accommodated in national parks”\(^6\)

It is outside the scope of this submission to comment in detail on all recreational activities. However, as well as undertaking hunting activities, SSAA Victoria members also use four wheel drive vehicles and camp in state forests. Some members also use companion gun dogs when hunting. VEAC is technically correct in its assertion that such activities can be accommodated in national parks, if special provisions are made in specific, designated sites. However, it does not mean that they will be accommodated. The reality demonstrated in the formation and ongoing management of other national parks is that those activities, if allowed, are heavily restricted. National parks do not allow for the same level of freedom to enjoy those activities that state forests do. State forests allow for dispersed camping, the presence of dogs and relative freedom of decision-making. National parks tend to concentrate camping to specific, designated areas and prohibit dispersed camping. The presence of dogs in national parks is prohibited.

One of the attractions of state forests for many recreational users is the ability to visit an isolated natural area, enjoy the natural landscape and be away from other people. That ability is severely restricted in national parks where designated camping areas are mandated. Some national parks even require pre-booking of sites, which significantly limits spontaneity and the ability to explore an area and decide on a camping location depending on the interests and tastes of the individual. Four wheel driving is also popular in state forests because there are usually significant track systems. National parks, again, are much more restrictive. Tracks will often be closed or designated for use by “management vehicles only”. Opportunities for four wheel driving will diminish.

The VEAC investigation provides no measurable assessment of the impacts of the draft recommendations. A broad “motherhood” statement declaring that activities “can be

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\(^5\) VEAC Central West Investigation Draft Proposals Paper. August 2018. Foreword Pg. 1

\(^6\) VEAC Central West Investigation Draft Proposals Paper. August 2018. Foreword Pg. 1
accommodated” without providing any measurable or comparable data is unconvincing and does not allow user groups to understand what the real impact of those recommendations will be.

3.2 Procedural Matters

3.2.1 Failure to adequately identify and evaluate cultural, social and economic values

Members of the panel are quoted in the Draft Discussions Paper as making four site visits over the course of the investigation and over the entire investigation area. SSAA Victoria recognises the difficulties VEAC faces in addressing the terms of reference it must operate under for the Central West Investigation. The Association also understands that panel members rely on reports and documentation rather than personal knowledge of the areas when making recommendations. However, it is the Association’s view that the investigation has failed to adequately identify and evaluate the cultural, social and economic values relating to hunting on public land and therefore has not given adequate consideration to these activities in making its draft recommendations.

At no stage has VEAC conducted detailed on-ground user surveys of hunters in the CWIA. No assessment has been carried out to see how many hunters use the areas and what effect the proposed recommendations will have on them. Additionally, there is no indication that any meaningful assessment has been carried out on how a reduction in hunting and other uses will affect local economies. Socioeconomic profiles of the investigation area have been produced, though they are of limited relevance in determining the values VEAC has been tasked to assess, especially the social and cultural aspects. The profiles are broad-based and are not necessarily representative of the profiles of the people who are the major users of the public land in the CWIA.

While consultants have been commissioned to provide an economic assessment of the current contribution of the native forest timber industry to local and regional economies, no mention is made of any economic assessment of hunting and other recreational activities. This omission appears to be a significant oversight. It calls into question the economic modelling and raises legitimate concerns regarding the validity of recommendations made without the benefit of an adequate cost-benefit analysis and a thorough understanding of all economic drivers.

Recreational hunting is continuing to grow in popularity. One of the main requirements of hunters is access to areas in which to hunt. State forests that currently allow hunting in the CWIA are a very important resource for SSAA Victoria members and other hunters. Hunters gain significant social and cultural benefits from hunting as well as contributing to the economic prosperity of regional areas. A report into the economic impacts of hunting in Victoria that demonstrates this outcome is available.

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7 VEAC Draft Proposals Paper. Pg.16
8 VEAC Draft Proposals Paper. Pg 16
9 Estimating the economic impact of hunting in Victoria in 2013
DEPI RMCG Bendigo:RMCG Client Files:ROZI - 63:A-K:63-D-12 DEPI Socio-economic research on hunting and game management
A new report is scheduled for completion in mid-2019. Preliminary data is likely to be available, yet there is nothing to suggest that VEAC has utilised these reports in drawing its conclusions and developing recommendations.

3.2.2 Incorrectly categorising hunting as a consumptive use

It is SSAA Victoria’s position that VEAC has incorrectly categorised hunting as a “consumptive use” activity. Hunting has been categorised in a similar manner to logging, mining or firewood collection, whereas it is in fact a recreational and nature conservation activity, more akin to bushwalking. Draft recommendations precluding hunting from national parks based on “consumptive use” are therefore based upon an incorrect premise.

In the CWIA hunters take either feral animals, which are considered to have detrimental environmental effects, or introduced game species, namely deer. No native natural resources are utilised or “extracted” by recreational hunters. In fact, recreational hunting contributes to positive environmental outcomes by reducing pest and problem animal impacts on natural environments and native species.

Hunting has been shown to be a safe, low-impact activity that does not preclude other uses of state forest. Nor is hunting incompatible with national parks. Hunting for deer successfully occurs in large areas of the Alpine National Park and in areas of the Gippsland Lakes Coastal Park. Hunting around the world does not usually occur in national parks because the parks provide protection to native animals. Native species in Australia are not targeted by recreational hunters and there is no reason hunting should not be a permitted activity in national parks.

The Association notes that the recommendations allow for hunting control programs. Control programs are not recreational hunting and do not act as a substitute for recreational hunting opportunities. VEAC should not confuse the two or be under the misapprehension that allowing for control programs will in any way mitigate the loss of recreational hunting opportunities.

3.2.3 Relevant State Government policies

The Terms of Reference state that VEAC must consider relevant government policies. There is no evidence to show that the Council is aware of, or considered, the Victorian Government Sustainable Hunting Action Plan 2016-2020. No reference is made to the SHAP whatsoever in the entire Draft Proposals Paper. This omission is contrary to the terms of reference and demonstrates a lapse in diligence by VEAC. The initial SSAA Victoria submission to VEAC addressing the investigation referred to the SHAP. It suggested that VEAC take the plan into account as it is relevant to the terms of reference. The fact that it has not been considered calls into question the validity of the draft recommendations that VEAC has made relating to hunting.

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11 VEAC Draft Proposals Paper. Appendix 4 pg 176-182
SSAA Victoria considers the Victorian State Government’s *Sustainable Hunting Action Plan 2016 - 2020* a key consideration in the current investigation. This plan outlines the government’s vision for game hunting within the state. The Association has previously highlighted to VEAC the relevance of sections 2.3, 2.4, 3.4 and 4.3 to this investigation.

Section 2.3 discusses monitoring the social and economic benefits of hunting in Victoria. Data obtained through this process is relevant to the Central West Investigation in accurately estimating those important benefits but has not been utilised.

Section 2.4 outlines the government’s commitment to promoting regional hunting opportunities. The recommendations that VEAC has produced show no evidence that this objective was considering when recommending other land classifications that, if adopted, will significantly reduce hunting opportunities.

Section 3.4 outlines the government’s desire to expand game hunting. The revocation of the Mt Cole Game Sanctuary would provide some additional deer hunting opportunities and would be in line with that objective. However, that small gain is insignificant when compared to the areas of land that will be lost to hunting under the proposed recommendations. The Mt Cole State Forest has always been open to pest species hunting so does not represent any overall increase in recreational hunting opportunities.

Section 4.3 outlines the government’s commitment to developing a deer management strategy. It is particularly relevant to the Mt Cole State Forest and the opportunity for recreational hunting for sambar deer to be introduced into areas where it has previously been precluded.

**3.2.4 Inherent bias in the investigation**

It is the view of SSAA Victoria that there is an inherent bias in the investigation and the recommendations which VEAC is making have largely been predetermined. Section 18 of the VEAC Act also specifies that *VEAC must have regard to the need to provide for the creation and preservation of a comprehensive, adequate and representative system of parks and reserves within the State in carrying out an investigation and in making recommendations to the Minister.*

The Association considers that state forest status and appropriate Regional Forest Agreements (RFAs) provide opportunities for adequate protection of environmental values and diversity. They also allow for other activities such as hunting. The definitions used by VEAC to define “protected” do not allow for such measures and VEAC is mandated to recommend the creation of more parks where particular conservation values are “under-represented”. Under the VEAC Act precedence is given to the creation of new parks over any consideration of the effects of proposed recommendations on user groups. VEAC’s assertion that “no change is not an option” demonstrates that the investigation commenced with a particular bias and that the outcomes were largely predetermined.

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12 VEAC Draft Proposals Paper Pg 53
13 VEAC Draft Proposals Paper Pg 5
4. SSAA VICTORIA SUMMARY RESPONSE TO VEAC RECOMMENDATIONS

4.1 SSAA Victoria opposes those VEAC draft recommendations that reduce recreational hunting opportunities

The Association considers that most of the recommendations made by VEAC in the Draft Proposals Paper, if implemented, will be detrimental to the interests of hunters.

The Association considers that the investigation has failed to adequately identify and evaluate cultural, social and economic values relating to hunting. Hunting has also been incorrectly described as a consumptive use, with consequent recommendations that it is not an appropriate activity in the proposed parks. Relevant state government policies, in particular the SHAP, have not been adequately considered and there is inherent bias in the investigation stemming from the VEAC Act.

The Association would expect those concerns to be addressed in the final report and that changes to recommendations be made in response.

4.2 SSAA Victoria position

It remains the position of SSAA Victoria that:

I) land currently gazetted as state forest within the CWIA be retained as state forest;

II) activities currently allowed in those areas, including hunting, be retained;

III) suitable areas of public land in the CWIA not currently open to unrestricted hunting, have restrictions removed and be opened to hunting, for example, hunting of sambar deer in the Mt Cole State Forest; and

IV) no new national or state parks be declared within the CWIA.

The Association supports the formal revocation of the Mt Cole Game Sanctuary. Deer hunting being permitted in the Mt Cole State Forest will provide recreational deer hunting opportunities alongside pest species hunting. Pest species hunting has always been permitted in the area so there will not be any significant change and there are no new safety issues that need to be considered.

The state forests in the VEAC CWIA are the major areas of public land available for hunting in the west of the state. The effects of the loss of hunting opportunities in those areas cannot be overstated. If the recommendations to create new areas of park are retained, it is the position of SSAA Victoria that recreational hunting should be allowed to continue in those areas. The precedence for hunting in national parks already exists. The Alpine National Park was created from state forests that were important deer hunting areas and hunting continues in those areas.
5. CONCLUSION

SSAA Victoria strongly supports sound conservation management on public land, including, where possible, sustainable and multiple-use recreation and commercial activities. The Association does not support the creation of any new national or state parks within Victoria that reduces the recreational and hunting opportunities of its members. It is the view of the Association that well managed state forests provide adequate environmental protection while allowing for a variety of sustainable use activities, including hunting.

If the VEAC recommendations are accepted as they have been drafted the Association’s members will be denied access to significant recreational hunting, camping and four-wheel driving opportunities. The Association requests that VEAC reconsiders those recommendations that adversely affect hunters and recommends that hunting continue in all areas where it is currently permitted.

SSAA Victoria thanks the Victorian Environment Assessment Council for the opportunity to comment on the Central West Investigation and to put forward this submission on behalf of its 38,000 members.

The Association looks forward to the release of the Final Proposal Paper.
6. REFERENCES

1. VEAC Act 2001
2. VEAC Central West Investigation Terms of Reference
3. VEAC Central West Investigation Draft Proposals Paper 2018
5. Estimating the economic impact of hunting in Victoria in 2013
6. Agriculture Victoria Website