Re: Australian Pest Animal Strategy 2017 to 2027: Consultation Draft

On behalf of the President and Committee of the Federation of Hunting Clubs Inc. we welcome the opportunity to comment on Australian Pest Animal Strategy 2017 to 2027: Consultation Draft.

We are conscious that the Department of Agriculture and Water Resources and other Commonwealth agencies may not be aware of the Federation so a brief introduction is provided. Following the introduction are our comments on the Consultation Draft which we trust are received in the spirit of collaboration and our genuine desire to contribute to improving pest management.

Introduction
The Federation of Hunting Clubs Inc. (the Federation) is an umbrella organisation of 37 hunting clubs representing hunters from metropolitan, rural and regional parts of New South Wales (NSW). The Federation was established in 1996 with the introduction of the Firearms Act 1996 and is recognised in the NSW Firearms Regulation 1996 as a ‘peak association’ for the purpose of satisfying the ‘genuine reason’ for being issued a firearms licence for recreational hunting/vermin control. Our members have extensive knowledge and experience in vertebrate pest control and have contributed many submissions on vertebrate pest management to state and commonwealth government agencies.

The Federation is arguably the premier organisation representing the diverse spectrum of hunting interests. Unlike the Sporting Shooters Association of Australia (SSAA) which focuses predominantly on ‘sport/target shooting’1 the Federation of Hunting Clubs’ focus is ‘hunting’.

Comments on the Consultation Strategy
Historically, strategies and plans for managing pest animals have been developed by government agencies in isolation with little opportunity for input from community stakeholder groups. It is only relatively recently that this has changed and hunters now have a legitimate expectation that their input with be seriously considered.

Our comments on the Consultation Draft relate to 2 key areas: Scope of the Strategy and Principles of Effective Pest Animal Management.

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1 SSAA NSW is “dedicated to protecting and promoting the shooting sports”
Scope of the Strategy
It is encouraging to see the Consultation Draft recognises that “what may be one person’s pest may be another’s valued resource” and for these species, “management will need to consider the economic, environmental and social impacts.”

The positive economic impact Deer hunting alone in Victoria is substantial with direct expenditure $138M and direct, full-time employment of over 500 full-time equivalent positions (Table 1)².

It is essential that state government agencies undertake triple-bottom-line assessment to determine economic, environmental and social benefits when developing all pest management programs.

Table 1. : Summary Economic Impact of Hunting, Victoria, by animal group, 2013

<table>
<thead>
<tr>
<th>Species</th>
<th>Expenditure ($m)</th>
<th>Share</th>
<th>Gross State Product ($m)</th>
<th>Employment (fte)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Deer</td>
<td>138.3</td>
<td>33%</td>
<td>57.2 84.8 142.1</td>
<td>531 608 1,140</td>
</tr>
<tr>
<td>Duck</td>
<td>99.4</td>
<td>24%</td>
<td>42.5 63.8 106.3</td>
<td>399 458 857</td>
</tr>
<tr>
<td>Quail</td>
<td>44.1</td>
<td>11%</td>
<td>18.2 28.1 46.3</td>
<td>184 201 385</td>
</tr>
<tr>
<td>Game Hunting</td>
<td>281.7</td>
<td>68%</td>
<td>118.0 176.7 294.7</td>
<td>1,115 1,268 2,382</td>
</tr>
<tr>
<td>Pest Animals</td>
<td>135.1</td>
<td>32%</td>
<td>59.0 85.3 144.4</td>
<td>483 614 1,097</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>416.9</strong></td>
<td><strong>100%</strong></td>
<td><strong>177.0 262.0 439.0</strong></td>
<td><strong>1,598 1,882 3,480</strong></td>
</tr>
</tbody>
</table>

Proposal
That the final Australian Pest Animal Strategy 2017-2027 include a requirement for state and commonwealth government agencies to systematically assess the positive as well as negative impacts of “pest” animals and that positive impacts also be considered when developing management options. This could be incorporated as a component of Priority 1.2.

Principles of Effective Pest Animal Management
The draft strategy places great emphasis on a co-ordinated approach to management of pest animals. ‘Co-ordinated management’ and ‘shared responsibility’ are repeatedly mentioned in the draft strategy.

Achieving co-ordinated action between multiple stakeholders however is complex and extremely difficult. Martin and Choy (2016)³ identified institutional impediments to effective pest management, including barriers to co-ordinated cross-tenure action. At the recent NSW Vertebrate Pest Symposium in Orange NSW, Professor Martin emphasised that the weakest link defines the effectiveness of any pest management program.

Bengsen (2014) evaluated the premise that poison-baiting programs coordinated among neighbouring landholders should provide the most effective and efficient tool for controlling fox (*Vulpes vulpes*) populations and impacts in mixed agricultural landscapes.

He found that coordinated baiting increases exposure of the target population to baits, however, 69% of foxes captured on properties that later baited were estimated to have survived the baiting period. Camera-trap surveys across baited and unbaited properties showed no detectable decline in average fox abundance after baiting.

It was concluded by Bengsen that high fox survival and the absence of detectable declines in abundance after baiting showed that even well-coordinated baiting programs can produce suboptimal results if many of the foxes using baited properties fail to locate and ingest lethal baits.

The problem of poorly co-ordinated cross-tenure action can conceptualised in Figure 1.

Figure 1 depicts the effect of imperfect co-ordinated pest management. Non-participation in co-ordinated pest management programs compromises the effectiveness of pest management programs.

Relying *solely* on co-ordinated pest management programs, as many state government agencies do, therefore is short-sighted and should, we believe, be complemented by *other* strategies to make up for the deficiencies of imperfect “co-ordinated” programs.

Because achieving co-ordinated action between multiple stakeholders and landholders is so problematic, the Federation proposes that an additional strategy/ies be applied *concurrently* with co-ordinated strategies.

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Proposal
That a second, complementary strategy of ad-hoc pest control be widely adopted to support, and help make up for the shortcomings of ‘co-ordinated’ control. This could encompass various control methods but would utilise licensed hunters and shooters to undertake shooting (and trapping) on private and public land.

Support for further involvement of licensed recreational hunters was provided by Dr Bengsen during a presentation\(^5\) at the 2016 NSW Vertebrate Pest Management Symposium at Orange:

“Recreational hunting is probably an underutilised resource.”

We trust these comments and suggestions are helpful, thought provoking and will be given due consideration.

Yours sincerely

Stephen Larsson
Special Projects Officer