SUBMISSION

on

AUSTRALIAN PEST ANIMAL STRATEGY
2017-2027

Consultation Draft

SHOOTERS UNION AUSTRALIA INC.
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1. **Introduction**

1.1 The purpose of this document is to provide comment and information in relation to the Consultation Draft as it applies to Shooters Union members.

1.2 Author – Jan Linsley  
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2. **Intended Audience**

Invasive Plants and Animals Committee  
Department of Agriculture and Water Resources  
Members and Branches Shooters Union Australia Inc

3. **Background and authority to comment**

3.1 Shooters Union Australia Inc was formed consequent to the formation of Shooters Union organisations in several states, the first of which was Queensland in 2005. SUA has two branches in WA, one in Queensland, two in NSW and individual members in all states.

3.2 The Shooters Union movement has grown rapidly and is now one of the largest shooting organisations in Australia.

3.3 Shooters Union has been represented at several advisory groups since inception.
4. **Introduction**

4.1 We note the well-prepared and presented Australian Pest Animal Strategy 2017 to 2027 Consultation draft.

4.2 We appreciate the amount of time allowed between publishing of the Consultation Draft and the deadline for submissions.

4.3 We appreciate the consultation and invitation to comment by submission. However we have a major concern that the strategy can easily be manipulated and used by anti hunting groups to outlaw recreational hunting over the next 10 years. Only through accountability and regular meaningful consultation with industry (especially firearm and hunting groups) can it be kept open and transparent. The strategy website states there have been continual improvements based on consultation with stakeholders and quality research (particularly over humane pest destruction) – but realistically there hasn’t been any. One submission opportunity every 10 years is simply not enough.

4.4 We note that the strategy is a revision of an existing strategy.

4.5 We note the request for consideration of the following:

- The revised strategy set out the roles and responsibilities of all stakeholders in pest animal management and prevention. Are these clear? Why/why not?
- Are the goals and priorities of the strategy focused in the necessary areas? Why/why not?
- The strategy is intended to describe how pest animal management fits into Australia’s biosecurity system. Is the link between Australia’s biosecurity system and pest animal management made clear in the strategy? Why/why not?

5. **General Comment**

5.1 Some of the research and information provided on “PestSmart” (and referenced as the “best practice” by this strategy) relating to animal management methods are essentially opinion pieces relying on old material (10 -20 years minimum), don’t reference facts or supporting evidence, and have an obvious bias against realistic animal management strategies used in 2016. This cannot be used as a basis for best practice moving forward. This is not to say that we blame the authors who are likely obliged to reflect the views of those organisations providing the funding. For progress to be made, this needs to be addressed immediately with new, independent, credible and peer reviewed research that is up-to-date and 100% factual, and which can be relied upon to make sound decisions. This is how we can have a firm factual foundation to move forward and achieve best practice.
5.2 Unfortunately, it would appear that the outdated, 20 year old guide *Model code of practice for the welfare of animals – Feral livestock animals: Destruction or capture handling and marketing* continues to be utilised by the RSPCA and other animal rights groups when providing ministerial advice – particularly for ground shooting and hunting with dogs. Particularly with reference to hunting with dogs, it appears that these groups deliberately provide an incorrect definition of what occurs while “dogging” or “amateur hunting” in order to gain ministerial support for bans or restrictions, and there is no-one to rebuke the misleading information because of the aforementioned lack of regular meaningful consultation. The flawed definition then continues to appear in the research referenced by the submission and is presented on *PestSmart*, which is clearly and deliberately incorrect. This situation has been advised to Minister Bill Byrne (when he was Minister for Agriculture), and the new minister more recently. This outdated document needs to have its content revised with a 2016 edition using the above processes.

5.3 We do not believe there is sufficient quality research available in this field on which to be basing future best practice and other decisions over the next 10 years. This needs to be addressed before the implementation stage can begin. Without the above checks and balances, it’s just another poorly researched government document that those with an anti hunting agenda will manipulate to suit their cause, and no-one else will follow.

6. **Specific Comment**

*Principles of effective pest animal management:*

8) The cost of pest animal management should be borne by those who create the risk and those who benefit from its management. Governments may co-invest where there is a net public benefit from any such intervention.

6.1 Most of the focus of pest animal management is on introduced species that have long been a problem in Australia; in some instances, since first settlement. The cost of pest animal management therefore cannot be borne by those who create the risk and the beneficiaries of pest animal management are the people of Australia, principally the farming community. It is unreasonable to expect that individuals currently involved in pest animal management should bear any of the costs of intervention. That is not to say, however, that the shooting community or property owners expect to be paid for their attempts to eradicate or reduce the numbers of feral animals. Appropriate incentives should be considered where it is feasible and desirable to do so, according to the size of the problem.

6.2 Social wellbeing

It should be noted that pest animals are not the only animals that have considerable negative social impacts and display adverse behaviour. Many native animals and birds cause significant social impacts, e.g. kangaroo populations are now much higher than prior to white settlement because our farms inadvertently provide food and water to encourage breeding that would otherwise not occur naturally. The loss
of crops from kangaroo populations can cause very negative impacts on farmers struggling to make a living in trying circumstances.

Some of the most disruptive noise comes from native birds, eg cockatoos which are also very wasteful feeders, able to decimate crops when populations are large.

6.3 Intergovernmental Agreement on Biosecurity

*Principle 6: relevant parties contribute to the cost of biosecurity activities.*

Please see our comment in 6.1 above. The principle needs to be amended because the principle does not take into account the historical nature of pest species in Australia.

6.4 We support the Roles and Responsibilities as set out in the consultation draft.

6.5 National vision: Goal 1: Priority 1.1

This priority recognises the need to further strengthen training capability and availability. Risks to effective pest animal practices resulting from lack of training should be identified and managed. The regulations and guidelines for managing pest animals differ across state and territory governments. Efforts to develop national consistent training, for example, through the Vocational Education and Training system, will need to account for jurisdictional differences to be successful.

It should be noted that any absolute requirement to undergo VET training (usually provided through an educational institution, eg TAFE College, is not practical for a variety of reasons:

- availability of training provider
- comprehensiveness of required training
- course length to cover all aspects
- course cost
- distance required for travel
- unreliability of internet connections for remote training
- cost of setting up the course and training appropriate course providers

As a suggestion, there is merit, but a requirement to undergo training would prohibit participation for the above (and other) reasons and would therefore be counterproductive to the aim of the strategy.

We strongly support the statement that the participation of landholders is critical to successful and sustainable established pest animal management.

6.6 We support the humane destruction or capture of feral animals.

6.7 We do not however, support, the use of poisons of any type, being neither humane nor target specific. We are concerned that hunting with dogs is reported as being inhumane. Dogs are trained to hold target species until a hunter can dispatch the animal in a humane manner. Yet this strategy promotes the use of poisons which, by their nature, cause suffering to whatever animal ingests them, even at second hand, ie consumption of a poisoned animal by a predatory or carrion bird or animal.
6.8 We would also argue that dingos are native animals, not feral, though we acknowledge the difficulty in distinguishing between dingos and domestic dogs gone wild. We also acknowledge a requirement for control of dingos in certain circumstances. To that end, we would suggest the reintroduction of dog bounties as an incentive to pest animal management.

6.9 We support the concept of performance monitoring. This can be as simple as having shooters count and report on the number of feral animals destroyed. Incentives, ie bounties, would be an appropriate encouragement.

7. **Recommendations**

7.1 An advisory committee of representatives from industry to regularly meet with government in meaningful consultation

7.2 Government funded, independent, new and up-to-date research undertaken with input from industry and other professionals

7.3 The definitions and effectiveness of various control techniques properly researched, corrected and accepted as humane (particularly ground hunting and hunting with dogs)

7.4 *Model code of practice for the welfare of animals – Feral livestock animals* replaced with new 2016 guideline based on fact, not emotion

7.5 Information provided on “PestSmart” needs to be revised (particularly the *Model Codes of Practice for humane control of pest animals*) with the assistance of industry and new research

7.6 RSPCA excluded from providing ministerial advice until its position as an animal rights group and spending of government funding has been properly investigated (eg TAS, WA, VIC)

7.7 Expansion of the areas requiring management to include National Parks and State forests in collaboration with industry (eg NSW R licence)

7.8 A focus on pest management and native animal welfare over pest animal rights/welfare

7.9 A new strategy based on new research with the inclusion of old research only with the agreement of the advisory committee

8. **Conclusion**

8.1 The revised strategy sets out the roles and responsibilities of all stakeholders in pest animal management and prevention. Are these clear? Why/why not?
8.2 Are the goals and priorities of the strategy focused in the necessary areas? Why/why not?

8.3 The strategy is intended to describe how pest animal management fits into Australia’s biosecurity system. Is the link between Australia’s biosecurity system and pest animal management made clear in the strategy? Why/why not?

The simple answer to all three questions is no. It can be likened to building a house without the plans – you will get a house, but it won’t function properly, will be unsafe and eventually fall apart. The last 10 year plan seemed to deliver good framework to work from in PestSmart, but it lacks substance, almost as if they ran out of time or money to complete it and just used someone’s opinion in place of quality research. This next plan should focus on:

- Recent, factual based and unbiased research to complete and revise PestSmart
- Securing a long term funding source
- Regular, meaningful collaboration with industry to look to implement action at a later date

Without these three things, this strategy will fail again.

With the support of Government, industry and recreational hunters can achieve 1, 2 and 3 above.

How? It’s simple:

Allow controlled recreational hunting in our National Parks and State Forests

- Uninterrupted trials and research can be conducted at no/little cost to the Government
- Once sound research has been achieved (and if successful), a structure similar to the “R” license in NSW could be established to generate revenue for further development of the strategy
- The R license could utilise the opportunity for education and training on best practice that is approved by industry and supported by recent quality studies
- These protected breeding grounds can contribute to positive and ongoing social and economic benefits and realistic pest management in the surrounding areas

This is not a new idea, but it is a realistic method that can be used by Government to implement this strategy, and will be 100% supported by industry.

Jan Linsley
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13/10/16