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Submission

to

NSW Department of Primary Industries

Locked Bag 21, Orange NSW 2800

on

The Proposed New Regulation The Game and Feral Animal Control Regulation, 2004

Compiled for Clarence Environment Centre

by John Edwards

Honorary Secretary

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The Proposed New Regulation Game and Feral Animal Control Regulation, 2004

Preamble

The Clarence Environment Centre has maintained a shop-front in Grafton for over 22 years, and has a proud record of environmental advocacy, particularly in the field of biodiversity conservation.

We concede that, because of Government's failure to adequately fund pest control on public lands, introduced pest species are now a significant problem. We also concede that shooting is often the best, and most humane control method for some species in some locations.

Justification

The justifications put forward to support “conservation hunting” have all come from the the hunter's lobby, with few if any conservationists supporting the move. In short they are:

1. Recreational hunting is effective for feral animal control and highly beneficial for conservation;
2. Recreational hunters offer a “free” or “low cost” service; and
3. Hunters are aligned to conservation, and provide the most effective basis for conservation.

Extensive investigations by the Invasive Species Council of Australia has debunked all three claims, uncovering more than 30 reports and scientific papers that show:

1. The Game Council's own records show that recreational hunting in State Forests does not effectively control feral animals. For example, of the estimated one million foxes in NSW (there are about 7 million Australia wide), recreational hunters killed an average of only 622 per year between 2006 and 2008 in State Forests. There are more than 600 state forests in NSW. If 25% of foxes are breeding females, there is the potential for close to a million pups to be born annually.

The Game Council has produced similar figures for feral pigs, while in the same 2 year period, only 279 cats and 106 dogs were shot by recreational hunters in state forests. That cannot be called “control.

2. The claim that recreational shooting provides a “low cost” service is extremely questionable. In the 5 years between 2004 and 2009, the NSW taxpayer funded the Game Council to the tune of more than \$9 million. Shooting licences netted less than \$2 million, a net loss to taxpayers of more than \$8 million.
3. Recreational hunters are more concerned with preserving feral animal populations to perpetuate their sport, that they are about conservation.
4. Unscrupulous hunters have been known to actually introduce pest species, particularly pigs and deer to pest-free areas to provide new hunting opportunities.
5. Many sporting shooters aim for trophies, only selecting the largest animals.
6. Recreational hunters cannot devote more than 1 or 2 days to a job, which normally requires an intensive operation sometimes lasting weeks to achieve effective control.
7. It is impractical to judge the expertise of the thousands of prospective hunters.
8. The hunting with bows and arrows is not humane, and the use of dogs will see native animals, particularly slow-moving species such as Koalas and Wombats killed.

Other serious concerns

Apart from the clear evidence available that so called conservation hunting is not an effective feral animal control mechanism, and is likely to actually increase the number of feral animals in Australia, the Clarence Environment Centre has numerous other concerns.

1. The most serious concern is the threat of personal injury, and even the killing, of park and forest workers and other users of public lands. The New Zealand experience should have alarm bells ringing. Three innocent bystanders have been killed in that country in as many years, and it is only a matter of time before the same happens here.
2. Immediate neighbours are also placed in danger of being accidentally shot.
3. The use of dogs to hunt feral animals is an appallingly cruel act. Fox hunting with hounds has been banned in most civilised countries, yet here in NSW we are planning to allow unaccompanied children to as young as 12 to hunt with dogs, knives and bows and arrows. This is almost unimaginable! Dogs will not discriminate between feral and native animals, with slower moving animals such as Wombats and Koalas being likely casualties.
4. International and domestic tourists, attracted by our renowned national parks and wilderness areas, will not want the experience to be marred by a background of gunfire. There is nothing more unsettling, or frightening, than to be in a forest when a gun is discharged nearby.
5. Currently, a permit to hunt can be acquired "on line", something that is unlikely to change given the expected thousands of applicants. It will be impractical to test the expertise of applicants in the field (shooting on a target range is vastly different to hunting an animal). The hunter has to know precisely where to aim to ensure an instant kill, and the target site differs from animal to animal. How can skill levels, fitness, and psychological profiles, of thousands of shooters be properly assessed?

Anecdote: I personally attended an OEH sponsored workshop in Coffs Harbour on September 8, 2011, to help develop its pest management strategy. Sporting shooters were well represented (30% of the group I was in), and one member, who claimed to be a regular hunter, must have been at least eighty years old and half deaf, with his wife shouting into his ear whenever he failed to hear what had been said. That man must be considered to be a distinct danger to other forest users, yet he has obtained a hunting licence. How?

Recommendations

Not only is the Clarence strongly opposed to recreational hunting being allowed in national parks and other conservation reserves, but we believe continued hunting in State forests cannot be justified, and should therefore be stopped. In any event we strongly urge the Department of Primary Industries to:

1. Stop the use of dogs and any other weapons, other than guns, for hunting purposes.
2. Remove the clause that permits unsupervised minors to undertake any form of hunting on public land
3. To replace the phrase 'public land' with 'public land not held under the NPW Act'.
4. Immediately remove the discount on licence fees offered to pensioners and minors (clause 17(2)), and remove the Game council's discretion to waive these fees (clause 17(6)) for the reasons stated above.
5. Keep the current requirement that shooters have to have the written permission for their hunt on them at all times (i.e. remove clause 4(2)(ii) in Sch.1 which gives hunters 2 working days in which to present this approval).

6. Require that full details of the firearm/s to be used are included on the permit, to ensure they are suitable (no pistols or revolvers for example).
7. Insert a new clause requiring the owner/manager of the public land to give all neighbouring landowners notification, for their own safety, of booked hunts at least 24 hours before the hunt is due to commence.
8. Ensure that warning signs, complete with dates when hunting is occurring, are placed at every access entrance to state forest hunting areas, including walking trails, and removed immediately on completion of the hunt.
9. Ensure that no native animals are allowed to be killed by recreational hunters in state forests.
10. It would be great to know how many shots these sporting shooters take that do not result in a kill, but could have wounded an animal which then likely dies a lingering and painful death. Perhaps the Department could undertake some research by randomly selecting, and monitoring some of these hunts. This could be done from a safe distance. Shots can be heard and counted, and the dead animals presented for inspection at the end of the day for statistical analysis.

We thank the Minister for this opportunity to comment.

Yours sincerely

John Edwards
Honorary Secretary