

5 September 2016

The Executive Officer
Environment, Natural Resources and Regional Development C'ttee
Parliament House
Spring St, East Melbourne 3002

Submission by the Victorian National Parks Association to the Inquiry into the Control of Invasive Animals on Crown Land

The Victorian National Parks Association (VNPA) welcomes this opportunity to make a submission to this inquiry. The VNPA is an independent member-based organisation, and has been the leading community advocate for protection of Victoria's natural heritage since the 1950s.

Summary

The VNPA sees this as an important issue because:

- 1/ Victoria's crown land hosts around 100,000 native species, many of which are threatened with extinction (e.g. DELWP's 'advisory list' identifies close to 1,000 endangered, vulnerable or rare native plants).
- 2/ Invasive animals are one of the major threats to the integrity of native ecosystems (along with invasive plants, fragmentation of ecosystems and climate change).
- 3/ Victoria's native species and the ecosystems on which they depend are given legal protection:
 - Globally under the International Convention on Biodiversity
 - Nationally under the Environment Protection and Biodiversity Conservation (EPBC) Act
 - Statewide under the National Parks Act, the Catchment and Land Protection (CALP) Act and the Flora and Fauna Guarantee (FFG) Act, among others.

We believe responsibility for management of pest species on Crown Land is the responsibility of Victoria's land management agencies, acting on behalf of the people of Victoria (a responsibility clarified in the various Acts mentioned above).

We do not believe existing or extended opportunities for amateur hunting are useful strategies for reducing the impact of invasive animals on our native ecosystems, and are quite inappropriate activities in a national park.

We believe the problem can only be addressed by a series of well-informed, targeted strategic programs, developed under independent expert advice, and given appropriate levels of long-term funding.

We are also calling for research into effective, humane biological and other controls.

Response to the terms of reference

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.***

The core issue here is whether control of feral deer in a national park should be strategically planned by public land managers with a good understanding of the complexity of natural ecosystems, drawing from the best scientific studies as well as experience. Or should strategic planning be skewed by particular interest groups who may have a rather inflated understanding of their capacity to solve the problem? We think not.

Can current or expanded recreational hunting of deer solve this population problem? The Victorian experience of an exploding deer population despite a very large amateur deer harvest should be enough evidence that it can't. While recreational hunting undoubtedly has an impact in some areas, it seems:

- The amateur harvest is large where the deer are in abundance, but is much smaller when the deer are in smaller numbers, allowing populations to re-establish.
- Amateur shooters concentrate their attention on relatively accessible areas, allowing healthy and large breeding populations in remoter areas.
- Amateurs often target 'trophy' stags, leaving breeding females alone.
- There is no strategic culling in areas where the most vulnerable ecosystems are being damaged.
- Many amateurs are new to the game (some very young), and incapable of accurately targeting animals.

A number of research and monitoring programs have clarified that situation.

A New Zealand research paper, for example, concludes¹:

"... neither commercial nor recreational hunting is likely to be a cost-effective alternative to state-funded control where very low densities are required in inaccessible or difficult-to-hunt areas. Although developed for deer control in New Zealand, the models are applicable to any situation in which harvesting is used as a form of population control."

And according to the RSPCA²:

- In Gum Lagoon Conservation Park in South Australia, 65 recreational hunters over 4 days were only able to kill 44 deer, while one professional marksman in a helicopter was able to kill 182 deer in 4 hours.
- In Tasmania, in two nights of shooting, a single professional marksman achieved the same level of population reduction as four recreational shooters in a year.
- Professional hunters are far more proficient at shooting deer humanely; in a cull of 856 impala in South Africa, 93% of animals were killed instantly, and the average survival time for wounded animals was 30 seconds, with no wounded animals escaping – a standard comparable to that achieved in commercial abattoirs.

¹ G Nugent and D Choquenot. *Comparing cost-effectiveness of commercial harvesting, state-funded culling, and recreational deer hunting in New Zealand*. Wildlife Society Bulletin 32 (2):481-492.2004
<http://www.bioone.org/doi/abs/10.2193/0091-7648%282004%2932%5B481%3ACCOCHS%5D2.0.CO%3B2>

² Is recreational hunting an effective and humane form of pest animal management in National Parks?
<http://kb.rspca.org.au/entry/540/>

Who should manage the control of deer in national parks?

The suggestion has been made by the Australian Deer Association that Victoria's Game Management Authority (GMA) should be 'tasked and resourced as the lead agency for the development and implementation of a Victorian Deer Management Strategy'. While the GMA should have input into any deer management strategy, it is not remotely appropriate that it should take lead responsibility for managing a listed threat to Victoria's biodiversity instead of DELWP or Parks Victoria.

In national parks, Parks Victoria is clearly the agency best placed in experience and expertise to manage the remarkable assemblage of native plants and animals the parks protect, and to deal with the threats to those species and ecosystems. And it has clear statutory authority in that regard. Where sufficient funding to do that job is lacking, Parks Victoria should be given the necessary resources.

A summary of legislation relating to deer control

While deer are given protection under the Wildlife Act, Sambar Deer are also listed as a 'Potentially Threatening Process' under Victoria's Flora and Fauna (FFG) Act (there is no higher threat listing available under the Act). Though that apparent conflict has been seen as hindering effective action on deer, the Wildlife Act clearly allows rigorous control of 'protected wildlife' if they are deemed a pest:

Parks Victoria and/or DELWP can and should apply for an exemption from the restrictions in that Act wherever deer are causing trouble:

- Section 7A of Victoria's Wildlife Act says that (with our underlining) the *"Governor in Council may declare protected wildlife to be unprotected in an area of Victoria"*
- And in *"Section 28G, Authorisation Orders as to taking etc. wildlife*
(1) The Governor in Council, on the recommendation of the Minister, may make an order authorising a class of person to do all or any of the following—
(a) hunt, take or destroy wildlife;" ...
(2) The Minister must not make a recommendation under subsection (1) unless he or she is satisfied that the making of the order is necessary—
(a) because wildlife is damaging buildings, vineyards, orchards, crops, trees, pastures, habitats or other property and authority is to be given by the order to owners, occupiers or administrators of such property or persons living in the vicinity of such property;

Nevertheless, the listing of deer as protected species under the Wildlife Act has created the impression that the perceived need of hunters for a very large population of deer has priority over feral animal management. It also creates an administrative impediment to effective action. The listing of deer under the Wildlife Act was made when deer were far fewer in number, and deemed in need of a level of protection. That should be removed now, as their population levels in no way warrant real or implied protection under the Act.

According to Article 8 of the International Convention on Biological Diversity which Australia has ratified, signatories must, among other things:

- *Establish a system of protected areas or areas where special measures need to be taken to conserve biological diversity;*

- *Develop, where necessary, guidelines for the selection, establishment and management of protected areas or areas where special measures need to be taken to conserve biological diversity;*
- *Promote the protection of ecosystems, natural habitats and the maintenance of viable populations of species in natural surroundings;*
- *Promote environmentally sound and sustainable development in areas adjacent to protected areas with a view to furthering protection of these areas;*
- *Rehabilitate and restore degraded ecosystems and promote the recovery of threatened species, inter alia, through the development and implementation of plans or other management strategies;*
- *Prevent the introduction of, control or eradicate those alien species which threaten ecosystems, habitats or species; etc.*

The authority of the Federal Environment Protection and Biodiversity Conservation (EPBC) Act derives from that Convention, and “Novel Biota and their Impact on Biodiversity” is listed as a “Key Threatening Process” under that Act. A number of listed species and threatened ecological communities which deer damage are also listed under the Act, notably: *Alpine Sphagnum Bogs and Associated Fens Ecological Community*.

The *National Recovery Plan* for that community identifies feral deer as a ‘*high threat*’, and an ‘*unabated problem in eastern Australia*’, causing damage through ‘*trampling, browsing and wallowing*’.

So the call for effective action is clear, and that action should take priority over any need to protect deer for hunting purposes – particularly when deer numbers and distribution are clearly growing way out of control.

Parks Victoria has thankfully responded to this problem, though only relatively recently, and so far their efforts have been limited:

- They have been ‘experimental’ (eg the Bogong High Plains program, which removed c. 42 deer)
- They have been restricted to localized strategic programs involving accredited volunteers (eg programs at Yellingbo, Dandenong Ranges National Park, Warramate Hills Nature Conservation Reserve and Wilsons Promontory National Park, each of which also removed relatively small numbers of deer).

These programs have the advantage of being strategic and carefully managed by Parks Victoria, however they suffer from the severe budget crisis Parks Victoria still faces.

That inadequate budget has meant:

- There is no clear commitment for important follow-up or continuing action (critical in any pest plant or animal eradication process).
- A dependence on accredited volunteers means:
 - Efforts are largely limited to areas close to Melbourne and/or close to roads and tracks.
 - Actions are limited to periods of time when suitable accredited volunteers are available.
 - volunteers, though relatively skilled, are limited in the means they can use (eg no silencers and no capacity for aerial attack).

So while we strongly believe Parks Victoria’s move towards strategic programs for deer control is absolutely the right move, there is a clear need for appropriate resourcing and funding, and a strong commitment to the involvement of professionals (as well as using accredited amateurs where they clearly prove to be useful and cost-effective).

We need a **well-informed statewide deer containment strategy**, based on the need to protect vulnerable ecosystems and species, and protect the integrity of our national parks and reserves.

In the interim there is an urgent need for well-funded strategic action to deal with new deer invasions, especially the recent invasion of Sambar at Wilsons promontory National Park

2. consideration of the application of these types of programs for other invasive animal species in partnership with Crown land managers;

Parks Victoria has performed a number of pest control programs across Victoria, using accredited amateurs and professionals. There is no indication from Parks Victoria, as far as we are aware, that recreational hunting is at all useful in feral animal control.

For example:

- A goat eradication program was conducted in the Warby-Ovens National Park with the intention of re-establishing depleted numbers of She-oaks. Both professional and accredited amateur hunters were initially employed, but the program floundered at the critical stage when the population became small, and difficult to access for ground-based shooters. A program of aerial shooting was employed, using experienced operators from NSW, and localized eradication was achieved. While aerial eradication was relatively expensive, the successful eradication apparently proved very cost-effective in the long term.
- A goat eradication program in Snowy River National Park initially involved strategic use of 'Judas goats' to establish the population locations, and amateur hunters in the less remote areas. However professionals were required to tackle the main population in remote and rugged country. Monitoring has shown the eradication was successful.
- A long-running goat control program in Murray Sunset National Park initially employed a mix of professional and accredited amateurs in ground shooting operations, but that proved ineffective in the more remote areas of the large park (c. 650,00 ha). Strategic use of a range of techniques, but importantly involving aerial shooting, has proved far more successful.

We re-iterate that pest control programs in national parks (or anywhere) should be designed by land management experts with the expertise to understand the ecosystems most in need of protection, and who are also well-versed in the relative effectiveness of pest control options. And those programs should be designed and funded to achieve success, notably (but not only) in the case of feral horses in the Alpine National Park.

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

This is a large subject, and we can only touch on it here. However there are two areas that particularly need resolution: adequate funding for management, and serious funding for research into new means of targeted pest control.

The overriding objective

It is important to remember that the overriding objective is not the culling of a certain number of pest animals, it is the successful management of vulnerable ecosystems and native species.

The need for research

There is a crying need for research programs into a range of options for pest control, including targeted, humane options for baiting animals (including delivery techniques); and innovative biological and genetic controls for pest animals. It will be particularly hard to reduce populations of the various species of deer in Victoria to suitable levels by any of the control methods currently in use. That leaves us with a scenario of long-term expensive management, most likely also including fencing off large areas of Victoria's public land. There are increasing options for any number of biological controls, potentially enabling cost-effective population reductions in targeted areas. Research should be funded, and options explored as a matter of urgency.

The report by the Victorian Auditor General, re adequate funding etc.

In 2010, Victoria's Auditor General released a report: *Control of invasive Plants and Animals in Victoria's Parks*. It made a number of recommendations, most of which were directed at Parks Victoria, and they have since been addressed by Parks Victoria to a large degree.

However two findings warrant another look:

- Recommendation 5, that Parks Victoria should "*structure invasive species resource allocation so that ... funding matches the extent and ongoing nature of the problem*", should really have been addressed to government funding of Parks Victoria's budget. It is clearly not possible for Parks Victoria to '*match the ...problem*' within an inadequate budget.
- And recommendation 7, that the '*Department of Sustainability and Environment [now DELWP] the Department of Primary Industries and Parks Victoria should implement a framework to monitor, evaluate and report on invasive species management across public and private land*' has not been adequately acted upon. It should be.

The full VAGO report is attached to this submission.

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We look forward to any opportunity to discuss these issues



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