



Submission to the Victorian Legislative Council Inquiry into the Control of Invasive Animals on Crown Land

Friends of the Gippsland Lakes Parks & Reserves (FOGL)

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Thank you for the opportunity to comment on the 'Inquiry into the Control of Invasive Animals on Crown Land'. FOGL has a broad base of members and supporters throughout the Gippsland Lakes and hinterland region who care deeply about the environment, biodiversity and ecosystems. Our Mission is to strive to protect and enhance the natural environment and biodiversity of the Gippsland Lakes area through research, evidence-based submissions to government bodies, initiation of on-ground projects and engaging the community through activities and education.

FOGL emphasizes that this Inquiry, as with all government Inquiries, should be

- Transparent
- Evidence-based
- Inclusive: environmental groups and NGOs should be included in policy development and decision-making

FOGL emphasizes

- **Government has a Duty of Care to the environment** and therefore must place the well-being of the environment and biodiversity ahead of any other consideration, including agriculture and recreational pursuits
- **Animal welfare issues are extremely important** therefore only those control or eradication methods established as the most humane methods should be adopted
- **Financial concerns and recreational pursuits should *never* be allowed to override considerations regarding well-being of the environment or animal welfare**

With regard to the Terms of Reference, FOGL emphasizes the following FACTS have been established through unbiased scientific research: (references below)

- Recreational hunting removes too few animals for effective management
- Bag limits protect the hunting resources (see C. Booth)
- Research on pigs using genetic evidence has established that there have been illegal translocations for hunting purposes
- Many invasive animals are dispersed by hunting
- There is strong motivation for recreational hunters NOT to reduce the population, but quite the opposite – to increase and disperse – to establish *increased opportunities for hunting*
- Several scientific studies have found that recreational hunting is NOT humane. Recreational hunting does not meet RSPCA conditions for humane culling by firearms. Research data indicate many animals are not cleanly or humanely killed by recreational hunters.

- Commercial harvesting and recreational hunting have been found to create incentives for the spreading of invasive species populations
- Recreational hunting has been found in several scientific studies to be NOT effective in species control. If it is not effective, then why allow it?
- Recreational hunting has been found to make professional animal control more difficult by altering the behaviour of the target animals, including changing foraging behaviour and dispersal.
- The most effective programs aim for large reductions of invasive animals over the shortest period of time (see scientific papers from the RSPCA Seminar 2010). This requires professional shooters operating according to an intensive program, not recreational hunters.
- Recreational hunting involves leaving carcasses over a longer time than with targeted professional culls. These carcasses left in the bush provide food for feral animals and can contaminate both water and land.
- For large animals, an assessment of alternative management methods (McLeod 2010 p 22) found the most humane method was shooting by *professionally-trained operators* (NOT recreational hunters).
- Other studies have found aerial shooting by *highly-skilled professionals* (NOT recreational hunters) to be the most effective and humane method of culling for several species such as horses and goats (see also ICS Justice 2013)

It is noted that species databases are NOT current. DELWP, Parks Vic and the community do not know what species, native and invasive, are out there. Therefore, the following are needed:

- Audit of current invasive animals
- Audit of what has been tried previously – what has worked; what has not
- Audit of threats – prioritize these threats
- Prioritization of those threats according to harm to our natural assets and biodiversity (not agriculture)

Public funds should not be spent where commercial or private assets are at risk. For example, if farmers are concerned their sheep are being taken by wild dogs, then they should fence their properties or get maramba sheepdogs to protect their flocks. The cost of protecting those sheep should be borne by the farmer, not the taxpayer. It is wrong for the taxpayer to fund protection of private or commercial assets.

Tourism is *never* an acceptable reason to allow invasive animals. Overwhelming data indicate invasive animals are causing much harm to our native flora and fauna and biodiversity. We have many less damaging means of attracting tourists – we do not need to allow invasive animals for tourists.

The following quote is from Parks Victoria's webpage within a Discussion of Non-native animal control by legal deer hunters: '... ad hoc take of pest species by recreational hunting does NOT constitute effective control'. J. Hakel, Parks Vic, Comment #629, 2010.

Commercial harvesting and hunting should NOT be promoted or accepted uncritically as appropriate ways to control invasive species – for all the specific scientifically-established points made above. Commercial harvesting and hunting have been found to create incentives for *spreading* invasive species and recreational hunting has been found in many scientific studies to be NOT effective in invasive animal control.

The following points are made by the Auditor General, Victorian Government in 'Control of Invasive Plants and Animals in Victoria's Parks; May 2010.

- The database on invasive animals must be updated (p 7)

- Management of the database must be improved and *made public* (p 7)
- The Trial Deer Program does *not* meet the Environmental Management Framework criteria for adequate planning and evaluation (p 16)
- There needs to be much more detail in planning (p 23)
- There should be transparency of Parks Vic allocation of resources (p 15)
- Funding must match the problem (p 15)

FOGL considers the following strategic points as critical to humane, successful management of invasive animals on Crown land and National Parks:

- **Establish an *Independent Auditor* with strong environmental credentials and free of conflicts of interest to oversee implementation of any plans or protocols following from this Inquiry.** This team must be free of any conflicts of interest regarding economics, agriculture, recreation, tourism.
- **Any approach to the management of invasive animals needs to be ecological and integrated, not species-specific.**
- **Emphasis should be on effective protection of biodiversity rather than ‘control’ of invasive animals.** It is possible to control an invasive animal with little or no positive biodiversity outcomes.
- **Legislate that those who create, exacerbate or perpetuate invasive animal problems be prosecuted** within the full extent of the law (see VNPA 2012) And then prosecute anyone who contravenes this legislation
- **Where shooting is deemed the most effective and humane method of control or eradication, only fully-trained professional shooters should be employed for the task** and should operate under strictly monitored protocols.

FOGL recommends that any and all plans or protocols developed from this Inquiry should

- Be based on the best-available scientific evidence
- Involve The Precautionary Principle
- Be transparent in process
- Define clear goals and outcomes that are operationalized and measurable
- Have adequate funding and resources to meet those goals and outcomes
- Be adequately monitored and Evaluated by an Independent Auditor
- Focus on long-term strategies and solutions, not short-term management
- Aim for large reductions of invasive animals over the shortest period of time
- Involve the most humane methods known to be effective for specific species

FOGL calls on the Government to act to protect our National Parks and public land for their natural values and biodiversity. Recreational hunting has no place in our National Parks.

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