



25 May 2016

Pest Animal Review
Natural Resources Commission

Online submission at: www.nrc.nsw.gov.au/pest-animal-management

Dear Sir or Madam,

Re: Pest Animal Management Review

The Southern Sydney Regional Organisation of Councils (SSROC) is an association of sixteen Councils in the area south of Sydney harbour. SSROC provides a forum for the exchange of ideas between our member Councils, and an interface between governments, other Councils and key bodies on issues of common interest. We facilitate collaboration between councils on joint ventures, procurement, and projects including advocacy. Together our member Councils cover a population of over 1.6 million, or one third of the population of Sydney.

Due to the timing of this submission it has not been possible for it to be endorsed by the SSROC Delegates. I will contact you should any issues arise as a result.

References below are to the document *Shared Problem, Shared Solutions, Pest Animal Management Review*, draft report March 2016.

Although the SSROC area is very urbanised, and includes some of Australia's most densely populated suburbs, pest animals are a significant problem. Feral cats, rabbits and foxes are particularly major problems in the area, so we urge the Government to include urban areas in future plans for pest animal management.

The area covered by SSROC's member Councils is host to many potential pathways for incursion of invasive and potentially invasive species. Sydney Airport and Port Botany both clearly represent risks, and are heavily regulated to prevent incursions. However, illegal imports do occur, and even legal imports may subsequently become uncontrolled. This further emphasises the need for the pest animal framework to encompass the metropolitan area.

SSROC supports the recommendations contained within the draft report. As a largely urban area within the metropolis of Sydney, SSROC's interests are confined to the range of pest animals that affect this environment.

Recommendation 1: Adoption of core components for State planning.

SSROC supports these fundamental elements as the key State planning functions, which are necessary to enable other draft recommendations. Governance at state level needs to be strengthened, while simultaneously acknowledging that community attitudes must be taken into account in implementing programs. We urge the NSW Government to take a leading role in the development of national policy.

Recommendations 11, 12, 13 and 14: including support and responsibility for pest management, community education, and vocational education and training.

SSROC strongly supports these recommendations. The strengthened and professional role of the coordinators will be essential to the effective implementation of the changes.

Community education is critical too, particularly in relation to responsible pet ownership and the community's role in pest animal management. For the SSROC area, it is particularly important to take community views into account, since interventions to control pest species will necessarily be delivered in populated areas. Conflicts can arise between residents with different views, which could be avoided or mitigated by adequate awareness and communication. It is important for all stakeholders, including the Department of Primary Industries, to acknowledge growing public concerns about animal welfare, and respond to those concerns with better management of operations and associated or general messaging.

Education in relation to the risks of potential incursion pathways is essential in the urban context, where animals can be relatively easily acquired but may subsequently be deliberately or accidentally released into the environment when they prove to be unmanageable or simply escape.

Appropriate up-to-date training for officers directly responsible for pest management is vital, but so too is broader awareness-raising for staff indirectly involved, such as Council Customer Service Officers.

Recommendation 16: Manage deer as a pest animal.

SSROC supports the recommendation to manage deer as a pest animal. The draft report notes the presence of some 3,000 rusa deer in the Royal National Park: it is important to note that these deer also inhabit adjacent private properties and Council reserves in several suburbs in Sutherland Shire. Council works with the National Parks and Wildlife Service (NPWS) to address a number of problems associated with the deer. Plant communities are affected by trampling, antler-rubbing and browsing resulting in changes to structure, loss of diversity, reduced ability to regenerate and even some local extinction. These changes in turn affect other species as opportunities for cover, foraging and nesting are diminished.

Deer also have a direct impact on residents, causing damage to gardens and fences, tipping over garbage bins, and hampering bush regeneration efforts by trampling. They have also been involved in collisions with cars, and can be dangerous when injured.

Recommendation 21: Adopt and resource a strategic risk-based approach to managing urban and pre-urban pest animals.

In particular, "work with Local Government to provide cost recovery and practical techniques to manage urban pests such as Indian myna birds." SSROC would strongly support this recommendation, except that it implies that no funding will be made available to Local Government to enable them to carry out this role, except by means of cost recovery of traps.

We note that this recommendation is made in section 7.3 of the draft report, *Greater consistency in managing introduced birds in NSW*. While birds, especially Indian myna birds, are serious pests in the urban context, so too are other species including rabbits, bats, cockatoos and foxes, and in peri-urban areas, so are deer and feral cats.

Controlling pest animals is difficult and expensive. However, the costs of failure to control them are also high, and include:

- removal and disposal by Council of dead animals from roads, private property and from Council-managed land;

- Council assessing and responding to injured deer, including humane destruction if necessary and involving NSW Police assistance to maintain public safety if necessary;
- Council assessment and implementation of solutions to persistently troublesome deer;
- Trapping, poisoning and shooting rabbits, foxes and feral cats in urban areas;
- Rectification of damage to property by the owner, such as fences and other garden structures, and vehicles;
- Repair of damage to playing field surfaces caused particularly by rabbits.

Recommendation 23: Reduce red tape surrounding recreational hunting on private land.

SSROC acknowledges the potentially useful role of recreational hunters in pest control. However, we emphasise that it is essential that they operate under the supervision of authorities as part of coordinated control programs, using hunting as a tool where appropriate and where needed. Supervision and monitoring is essential, since the success of a program to control or eliminate a pest species (such as deer and foxes) would jeopardise the recreational utility of those same species: this would conflict with the aims of recreational hunters.

Recommendation 24: Maintain access to markets for pest animals.

SSROC urges the NSW Government to exercise caution in implementing this recommendation. While access to markets for pest animal products could be helpful in providing an incentive, they can also create a perverse incentive to cultivate the animals in order to profit from that market.

Recommendation 26: Expand research capabilities.

SSROC strongly supports this recommendation. The proposed Centre for Invasive Species Solutions is very important to the success of the implementation of the proposals, and we urge the NSW Government to advocate strongly for its establishment. It is essential that the nation has a central organisation to coordinate, prioritise and develop research on pest animals, if the country is to manage its ecology effectively. A national unit would be best placed to monitor pest trends and better predict future problems, through collaboration and collation of national statistics.

SSROC urges the Government to include in its research program the role of the dingo as apex predator. Studies¹ have indicated that the dingo can play an effective role in the management of invasive species. Therefore, while the conservation of dingoes inside national parks is welcome, a more active approach to dingo conservation should be considered to enable the species to function as apex predator.

As noted in the draft report, community reporting is less accurate than formal reporting. However, SSROC strongly supports the promotion and use of citizen science and data-mapping as mechanisms, since they are very effective tools for raising awareness, as well as providing useful data for monitoring and managing pest species.

SSROC would also urge the Government to fund social research into the behaviours of those who deliberately or unwittingly spread pests, to guide policy responses.

¹ For example:

- Glen A.S., *Enough dogma: seeking the middle ground on the role of dingoes*, Current Zoology 58(6): 856-858, 2012
- Letnic M, Crowther M.S., Dickman C.R., and Ritchie E.G., *Demonising the dingo: how much wild dogma is enough?* Current Zoology 57(5): 668-670, 2011
- Johnson C.N., and VanDerWal J., *Evidence that dingoes limit abundance of a mesopredator in eastern Australian Forests*, Journal of Applied Ecology 2009, 46, 641-646
- Levy, S. *The Dingo Dilemma*, Bioscience June 2009, Vol.59 No.6 465-469

Recommendation 29: Ensure that timely resources are made available to address the risks posed by new incursions.

SSROC strongly supports these recommendations, as it is important that new threats are identified early and action taken as quickly as possible to prevent their spread, eradicate the incursion and block the pathway. The recommendation could be broadened to cover other resources than funding. For example, in an emergency, the proposed Centre for Invasive Species Solutions could provide expertise to the relevant regional coordinator.

Recommendation 30: Provide adequate resources to deliver effective pest animal management.

While SSROC supports the intent of this recommendation, it is not clear how this funding mechanism based on rates from properties greater than 2 hectares would be effective in the urban area. A strong commitment to ongoing funding for regional coordinators is essential for the effective delivery of the recommendations.

In addition, SSROC would recommend the establishment of a pest animal advisory committee to review the operation of current activities, identify gaps and opportunities, respond early to future risks identified and to improve engagement and cooperation.

Thank you for the opportunity to make this submission, and for the additional week allowed for the consultation period. For any enquiries regarding this submission, please feel free to contact me or Helen Sloan, SSROC Program Manager on 02 8396 3800

Yours sincerely,

A handwritten signature in black ink that reads 'Namoi Dougall'.

Namoi Dougall
General Manager
Southern Sydney Regional Organisation of Councils