



Sporting Shooters Association of Australia
Victoria Ltd

Submission

**River Red Gum Parks Draft Management Plan
June 2017**

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1. ABSTRACT

The Sporting Shooters Association of Australia (Victoria) Ltd (SSAA Victoria) submission outlines the Association's response to the River Red Gum Parks Draft Management Plan.

The Draft Management Plan (DMP) looks at the management of more than 100 parks and reserves covering more than 215,000 ha in northern Victoria. It includes Gunbower, Hattah-Kulkyne, Lower Goulburn and Warby-Ovens national parks, part of Murray-Sunset National Park, Leaghur State Park, Gadsen Bend, Kings Billabong, Murray-Kulkyne and Nyah-Vinifera parks, the proposed Murray River Park, and Shepparton and Kerang regional parks.

The intent of the DMP is to protect and enhance the area's natural, cultural and recreational values. The DMP adopts a landscape-scale approach for managing the environment, cultural heritage, recreation and tourism. It includes a visitor experience framework approach, which aims to promote the value and experiences important to park visitors in specific settings, destinations and journeys. The DMP also seeks to maximise the social and economic benefits of the parks beyond their boundaries including tourism and education.

It is SSAA Victoria's position that, *in summary*:

1. the Association supports the continuation of recreational hunting within the River Red Gum Parks management area on state game reserves, historic areas and reserves, streamside reserves and bushland reserves;
2. as per the government's Sustainable Hunting Action Plan 2016-2020, additional opportunities for recreational hunting be made available wherever possible within the entire River Red Gum Parks management area, including parks;
3. maps, including the interpretive map, must clearly show all areas where hunting is permitted within the management area;
4. access tracks, remote bush camping opportunities and access to canoe/boat launching facilities for duck hunting are required by hunters and need to be retained;
5. land status for Lower Ovens Wildlife Reserve (WR) must be confirmed as a state game reserve with hunting permitted; and
6. clear and accurate signage is required on-site to let hunters and the general public know where hunting is permitted.



2. BACKGROUND

2.1 Overview

SSAA Victoria is a public company with 38,000 members. Its mission includes promoting the interests of firearms owners and advocacy to government, regulatory bodies and the general public.

Approximately eighty percent of its members hunt, with SSAA Victoria advocating on their behalf on hunting-related matters. Hunting activities include feral pest control on private and public land and hunting for game species during declared open seasons. SSAA Victoria also has a Memorandum of Understanding (MOU) with Parks Victoria (PV) for a Conservation and Pest Management (CPM) program, ratified in July 2012. The first pest management program with PV began in 2003. Since that time SSAA Victoria has worked with PV to control a number of animal species within metropolitan and regional parks in Victoria, including several covered by this plan. Under the terms of the MOU SSAA Victoria, with the approval of PV, plans, coordinates and delivers the control programs. They are designed to maximize positive biodiversity, 'good neighbour' outcomes and reduce threats to key conservation values in parks.

As hunters, SSAA Victoria members are directly affected by the DMP. Reviews of public land status or the development of new management plans, where a change in land classification or use could either preclude or allow hunting to occur, has significant impacts on members.

2.2 More about SSAA Victoria

The aims and objectives of the SSAA Victoria are to:

- *promote and encourage competitive target shooting and practice shooting with a view to developing proficient and safe use of firearms;*
- *promote and encourage ethical hunting, field shooting and related ancillary activities;*
- *advocate for game fauna conservation and promote understanding between SSAA Victoria members, land-holders, regulatory bodies, other interested groups and the general public;*
- *promote and facilitate the development of knowledge of the history of firearms and ammunition development and design; and*
- *promote the rights of firearms owners and advocate to government, regulatory bodies and the general public.*



3. DRAFT MANAGEMENT PLAN ADDRESSED

3.1 Recreational Hunting - Legal Access

SSAA Victoria is opposed to the creation of new parks where the change in land status disenfranchises hunters. The single biggest issue facing Victorian hunters is access to land areas where they can hunt. State forests in Victoria have had a long tradition of providing the majority of hunting opportunities for recreational hunters on public land. State game reserves allow hunting of game species during declared open seasons and some other land tenures also allow hunting for both game and pest species. Deer hunting occurs in some national parks on a seasonal basis. Hunting should be allowed as the default position in all parks unless compelling grounds exist to exclude it.

For public land to be considered for classification as a national park it must have high conservation value. The fact that state forests are being considered for classification as national parks indicates that they are considered to have high conservation value. That view, in turn, demonstrates that the diverse activities conducted within them are quite compatible with a healthy and sustainable environment. Given the proven success of this management regime, it is SSAA Victoria's view that change is unnecessary. It is inappropriate to restrict or prohibit long-established uses of public land due to a philosophical position that sees the creation of national or state parks as a solution for all environmental challenges.

That said, SSAA Victoria acknowledges the consultative efforts that have been made with hunting organisations and other stakeholders when drawing up the DMP for the River Red Gum Parks. The Association is supportive of the hunting arrangements that have been included in the DMP. The continuation of hunting on bushland reserves, historic areas and reserves, streamside reserves and state game reserves within the management area is supported by hunters. Given the hunting objectives outlined in the *Sustainable Hunting Action Plan 2016-2020 (SHAP)*¹, the Association would expect to see more hunting opportunities made available under the DMP. SSAA Victoria sees recreational hunting as being a compatible activity within most parks.

It is encouraging that the SHAP is referred to in the DMP and that one of the goals of the DMP, outlined on page 116, is to provide opportunities for sustainable hunting. However, there are a number of areas where ambiguous or contradictory language is used in the DMP. For example, on page 115 it states that, "Recreational hunting is to be prohibited within the proposed Murray River Park." In Table 7.3, on page 116, the plan states that, "Murray River Park (proposed): Hunting permitted but subject to park establishment, after which hunting will continue in designated hunting areas".

One area mentioned in the DMP as being open to hunting is of particular concern. Lower Ovens WR is listed in Appendix 1 as a state game reserve, where hunting is to be permitted. However, it is not gazetted as a state game reserve. Information received from PV indicates that the land in question was identified by the VEAC River Red Gum Forest Investigation in 2008 and proposed to be included in the Warby Ovens National Park. Discussions were held between the Brumby Labor Government

and hunting stakeholders in regard to the potential loss of access to historical hunting areas. The outcome was agreement that various areas of land, including the Lower Ovens WR, would be reserved under the Wildlife Act 1975 as state game reserves for the purpose of hunting. It would appear that this has not happened and PV are now seeking clarification from DELWP on the correct status of that land for the final plan². It obviously has significant implications for hunting access and needs to be resolved prior to the implementation of the DMP.

Recreational fishing (Table 7.4, page 121) is permitted, and encouraged in all areas of parks covered by the DMP, except reference areas. It is the view of SSAA Victoria that recreational hunting should be similarly treated.

3.2 Recreational Hunting - Physical Access

Legal access is the first issue for hunters. They need to be appropriately authorised to hunt on the land in question. The second issue is physical access to that land. The DMP addresses general access and visitor facilities in some detail. While general access is relevant to hunters, there are also specific hunter access issues that the DMP needs to take into account. When making decisions to review the track networks, including closures, managers must be aware that hunters may only use tracks infrequently to get to isolated areas to go hunting. Other users may not use those tracks at all, yet they are extremely important to facilitate hunting opportunities.

Hunters do not generally need well maintained, 2WD all-weather tracks. However, they do need to get to areas where hunting is permitted. SSAA Victoria expects that all proposed track closures under the DMP specifically consider the implications for hunter access and that consultation occurs with hunting stakeholders prior to any closures. The SHAP mentions access and signage as an issue for hunters and aims for an improvement in physical access to state game reserves. The Association sees these as important considerations that should be addressed in the DMP. In some areas, with the creation of the proposed Murray River Park, hunters may have to access hunting areas through parks. The DMP needs to ensure provision is made for the carriage of firearms and dogs through such areas.

3.3 Recreational Hunting - Ducks

As recognised in the DMP, duck hunting is a popular activity in many areas of the River Red Gum Parks management area. SSAA Victoria is supportive of the arrangements that allow the continued hunting of ducks in state game reserves, bushland reserves, streamside reserves and historic areas and reserves.

Gundogs are used by many duck hunters for the retrieval of downed game. Hunters are encouraged to use trained dogs, allowed under Schedule 5 of the Wildlife (Game) Regulations 2012, to ensure birds are recovered. The Association notes that specific mention is made of investigating options to allow camping with dogs within designated areas in the Lower Ovens WR during the duck season. Provision needs to be made in areas open to duck hunting for the similar permission of gundogs.



Hunters tend to camp in dispersed bush campsites close to the waterways and swamps where they hunt. The general provision within the DMP to continue to facilitate this type of camping in suitable areas is supported. There should be no restrictions placed on this type of camping under the DMP in any areas open to hunting.

In areas with shallow water, hunters will wade swamps and need no particular facilities. In deeper water, hunters may use canoes or small motor boats to access hunting areas. Basic facilities to enable the launching and retrieval of such craft are required.

3.4 Recreational Hunting - Deer

When hunting organisations negotiated with the Brumby Labor Government on hunting in the DMP area, deer were only present in low numbers in some parts of the DMP area. Since then deer populations appear to have increased throughout Victoria, including along the Goulburn/Murray corridors.³ The creation of parks will potentially restrict recreational hunter access to areas previously open to deer hunting. Since the SHAP calls for increased recreational hunting opportunities, the DMP should allow for deer hunting in as many areas as possible.

This approach will have a number of benefits. It will provide hunting opportunities to SSAA Victoria members, along with other appropriately licensed hunters. It will help meet the objectives of the SHAP by increasing hunting opportunities and it will contribute to the reduction of grazing pressure by removing deer. The reduction of grazing pressure is a goal outlined on page 60 of the DMP, Chapter 6, *Caring for Country*. Since the government is currently developing a deer management strategy for Victoria as part of the SHAP, the strategy should be considered when making future management decisions regarding deer hunting in the River Red Gum Parks.

3.5 Recreational Hunting - Pest Species

Several pest species and significant numbers of individual pest animals inhabit the River Red Gum Parks areas. They include rabbits, goats, pigs, foxes, feral cats and feral cattle. Deer are classified as game in Victoria and the recreational hunting of deer has been discussed in the previous paragraph. Recreational hunters provide a large volunteer group which can contribute significantly to the removal of pest species from public land, with no direct cost to government.

Hunting pest species can have significant environmental benefits. They include protecting native species from predation, allowing an increase in the extent and richness of vulnerable fauna and the occupation of most of their potential habitat. The hunting of rabbits, goats, pigs and feral cattle can contribute to the prevention of environmental damage by reducing total grazing, browsing and trampling pressure on ecosystems.⁴

The report of the Parliamentary Inquiry into the Control of Invasive Animals on Crown Land, released in 2017, contained findings and recommendations relating to the recreational hunting of pest species that are relevant to this DMP.⁵ Any management plan dealing with feral animal control requires a suite of options to be used to achieve the desired outcomes. Recreational hunters should be used as a significant free resource under the DMP. Recreational hunting, by itself, will not



eradicate feral animals, nor would any other single control method. However, every pest animal removed from the landscape by a recreational hunter provides an improvement to the health of the environment with no cost to government.

The SHAP calls for an examination of the feasibility of pest animal hunting being allowed on state game reserves. SSAA Victoria supports this initiative and also supports increased hunting opportunities for pest animals on other land classifications, such as parks, where this activity is currently not permitted. The Association understands that not all areas are suitable for pest species hunting activities to be carried out, however, management plans should incorporate recreational hunting for pest species wherever possible.

3.6 Conservation and Pest Management (CPM)

As mentioned in the Overview, SSAA Victoria has been involved in CPM Programs with Parks Victoria since 2003. Current programs running in the DMP area include goat control in Murray-Sunset National Park and pig control in Barmah National Park. These control programs differ significantly from recreational hunting. They are highly controlled and co-ordinated, with significant PV and SSAA Victoria resources invested in their operation.

Given the level of control of these programs, they can often be carried out in areas where it may not be possible to allow unsupervised recreational hunting. SSAA Victoria is committed to achieving positive environmental outcomes through its involvement with CPM. With increased areas of park, there would likely be opportunities to implement new programs within the DMP area. However, the only specific mention of partnering with hunting organisations and volunteer hunters is in relation to fox control on small natural feature reserves and Kerang Wetlands.⁶

It is the Association's view that the DMP should consider CPM programs in more depth and look at incorporating them into the pest management strategy on a broader scale.

3.7 Safety

Hunting is a safe recreational activity for participants and the general public. The available statistics show undesirable hunting-related incidents rarely occur.⁷ A report commissioned for the Game Council of NSW in 2010, using data from the National Coroners Information System, found that there were only 16 hunting deaths from firearms throughout Australia between July 1, 2000 and August 1, 2010.⁸ None of these deaths involved members of the general public. The very small number of deaths involving hunters resulted predominately from hunters accidentally shooting themselves or another member of their hunting party.

Unfortunately, negative publicity regarding firearms (largely through media reports of illegal activity by criminals) can make members of the public unnecessarily concerned about the use of firearms in hunting. The reality is that the incidence of mishaps is so low that it is insignificant. Concerns regarding hunting mentioned on page 115 for Marbein Common, Parolas VEA and Baillieu Lagoon



Wildlife Reserve need to be assessed against evidence and fact, rather than emotion and perception. Ongoing consultation with hunting organisations is required on this issue.

SSAA Victoria recognises that some areas, due to a variety of factors, including high visitor use and development, may not be suitable for recreational hunting. However, there are many areas not currently open to hunting where hunting could occur in a safe manner. Any loss of hunting access in areas close to towns must be offset with the opening of additional areas in compensation.

3.8 Other Matters

The contribution by hunters to the Victorian state economy is significant. Hunters are estimated to inject \$439 million per annum into the state, with a significant portion being spent in rural and regional areas. It includes the towns along the Murray River that are affected by the DMP. Parks Victoria should consider the economic and social effects, as well as the desired environmental outcomes, when making decisions about parks. Hunting restrictions in some areas have the potential to adversely affect the economic prosperity of nearby towns.

Accurate signage on-site and detailed marking on maps is required to clearly show where hunting is permitted. It will enable hunters to obey the law and hunt only in permitted areas. Signage will also let members of the public know that hunting is a lawful and legitimate recreational activity carried out in those areas.



4. RECOMMENDATIONS

In relation to the Draft Management Plan, it is the position of SSAA Victoria that:

- I) as per previous agreement with government, and as outlined in the DMP, hunting continues in all state game reserves, bushland reserves, streamside reserves and historic areas and reserves;
- II) recreational hunting for deer and pest species, with appropriate protocols, be introduced into state game reserves;
- III) in accordance with SHAP objectives and in light of the recommendations and findings of the *Inquiry into the Control of Invasive Animals on Crown Land*, additional opportunities for recreational hunting be made available wherever possible within the entire River Red Gum Parks management area, including in parks;
- IV) maps, including the interpretive map, must clearly show all areas where hunting is permitted within the management area;
- V) clear and accurate signage is required on-site to let hunters and the general public know where hunting is permitted;
- VI) access tracks, remote bush camping opportunities and access to canoe/boat launching facilities for duck hunting are required by hunters and need to be retained;
- VII) land status for Lower Ovens WR be confirmed as a state game reserve with hunting permitted;
- VIII) emotive, unsupported safety concerns are not valid reasons to preclude hunting from the DMP area. Any perceived safety issues should be resolved with hunting organisations; and
- IX) opportunities for the establishment of additional CPM programs should be examined where unsupervised recreational hunting may not be appropriate.



5. CONCLUSION

SSAA Victoria fully supports the management of public land to achieve sound conservation outcomes, while allowing multiple activities, including hunting. The formation of new parks is not necessarily the best way to achieve that objective.

The DMP is a comprehensive document that attempts to deal with the management of huge areas of land, with differing land tenures. The complexity of the task means that there is significant potential for issues to arise. The Lower Ovens WR land status is one example. Any such issues need to be resolved in a timely manner on the basis of consultation with stakeholders. SSAA Victoria supports the fact that hunting is able to continue on various land tenures under the DMP.

The Association would seek clarification of all hunting areas on the interactive map as a priority. Coupled with clear signage on-site, it will enable hunters to know with certainty where they can hunt. It will also inform other users that hunting is permitted in a particular area. The Association would also like to see additional hunting opportunities provided wherever possible in the management area, as per the objectives of the SHAP, including in the various parks within the DMP area. The hunting of deer during open seasons and pest species on suitable state game reserves would be an appropriate place to start.

Access, both legal and physical, is the biggest issue facing hunters in Victoria. The Association would expect that every effort is made under the DMP to maximise hunting opportunities for SSAA Victoria members.

On behalf of its 38,000 members, SSAA Victoria thanks Parks Victoria for the opportunity to comment on the River Red Gum Parks Draft Management Plan.



6. REFERENCES

1. *Sustainable Hunting Action Plan 2016-2020*
Authorised by the Department of Economic Development, Jobs, Transport and Resources. 1 Spring Street, Melbourne 3000. ISBN 978-1-925532-28-9 (print) ISBN 978-1-925532-29-6 (pdf/online).
2. Email correspondence Joshua Chikuse PV to David Laird SSAA Victoria 5/9/17.
3. Anecdotal reports. No verifiable published data exists relating to total deer numbers in Victoria or to the areas covered by the DMP.
4. *River Red Gum Parks Draft Management Plan June 2017*. Goals outlined on page 59 and 61.
5. *Inquiry into the Control of Invasive Animals on Crown Land*
Parliament of Victoria Environment, Natural Resources and Regional Development Committee Ordered to be published VICTORIAN GOVERNMENT PRINTER June 2017 PP No 297, Session 2014-17, Document 1 of 2 ISBN 978 1 925458 92 3 (print version) 978 1 925458 93 0 (PDF version).
6. *River Red Gum Parks Draft Management Plan June 2017*. Strategy outlined on page 61.
7. Detailed statistics on hunting related deaths or injuries are not readily available. Reference 8, below, provides the most comprehensive report available. The latest statistics available on Australian sports injury hospitalisations from 2011-12 did not even list hunting or shooting activities as a reported injury. Australian Institute of Health and Welfare Canberra INJURY RESEARCH AND STATISTICS SERIES Number 92 Australian sports injury hospitalisations Cat. no. INJCAT 168. <https://www.aihw.gov.au/getmedia/5079eccc-944d-4c7e-8e4f-04f03dbd7c97/18053.pdf.aspx?inline=true>
8. NCIS Database Search, Australian External Cause Deaths While Engaged in Hunting Activities Between 1 July 2000 – 1 August 2010. Produced for and provided to the NSW Game Council of NSW. Compiled by Lisa Crockett, National Coroners Information System, August 2010. <https://ssaa.org.au/assets/news-resources/hunting/australian-external-cause-deaths-engaged-hunting-activities.pdf>