



Sporting Shooters Association of Australia
Victoria Ltd

Submission

**Statewide Assessment of Public Land
Discussion Paper and Draft Proposals Paper**

for the

Victorian Environmental Assessment Council

November 2016

TABLE of CONTENTS

1. Abstract	3
2. Background	5
2.1 Overview	5
2.2 More about SSAA Victoria	5
2.3 Terms of Reference	5
3. Terms of Reference Addressed	7
3.1 Assessment of current system of public land use	7
3.2 Assessment of the current reservation status of public land	7
3.3 Inventory of the types of values on public land	8
4. Comments on the Draft Recommendations	9
5. Conclusion	11

Contact:

The Sporting Shooters Association of Australia (Victoria)
Unit 3/26 Ellingworth Pde Box Hill 3128
03 8892 2777

1. ABSTRACT

The Sporting Shooters Association of Australia (Victoria) Ltd (SSAA Victoria) submission addresses the discussion paper and draft proposal for the investigation into the Statewide Assessment of Public Land by the Victorian Environment Assessment Council.

The information and content contained within this submission addresses the terms of reference as they relate to the use and activities of our members within the public land structure.

We have only limited experience with regard to the municipal use of public land and the administration of that land by committees of management. This experience has been gained by providing pest animal control on land managed by municipal councils.

The purpose of the investigation is to:

1. *provide an assessment of the current system of public land use categories,*
2. *assess the current reservation status of public land, and*
3. *provide an inventory of the types of values on public land.*

In its submission, it is the position of the SSAA Victoria that, *in summary*:

- i. there is a definite need to consider a change to the current system for categorising public land. This change should reflect the use or purpose of the land and the public's expectation of its right of entry,
- ii. the current categorization is flawed and the system inappropriate. It encourages the 'locking up' of areas and the denial of public access rather than the education of the public as to special uses or specific habitats within those areas. It occurs in respect of track and road closures for extended periods, and
- iii. there is a significant number of values deriving, both financial and non-financial, from the management of public land. While some are not quantifiable, they are nonetheless present.
- iv. It is the position of the SSAA Victoria that: When hunting on public land, our members rely on the information and mapping provided by government departments to ensure i) they stay within the legally designated areas where hunting

is permitted, and ii) they have up-to-date information for vehicular and foot access. However, with respect to government-issued maps, they can be little better than 'mud maps', bearing limited correlation with what is actually on the ground. They also tend to be deficient in the definition of boundaries - especially where there are junctions between hunting and non-hunting areas.

2. BACKGROUND

2.1 Overview of the SSAA Victoria

The Sporting Shooters Association of Australia (Victoria) Ltd (SSAA Victoria) is a public company with 36,000 members. Its mission includes promoting the rights of firearms owners and advocacy to government, regulatory bodies and the general public.

The Association has conducted surveys which show that 70% to 80% of its members are involved in hunting. These members rely on access to public land to undertake *both* game and pest/feral animal hunting.

It is the position of the SSAA Victoria that there is a definite need to consider a change to the current system of categorising public land.

Further, 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.*

2.3 Terms of reference

The terms of reference for the investigation state that:

'The focus of the investigation is to provide information and recommendations to assist management effectiveness'.

Council were requested in particular to provide:

1. *an assessment of the current system of public land use categories and consideration of options for changing or consolidating the existing categories,*

2. *an assessment of the current reservation status of public land, including areas where land use has changed since government accepted a recommendation, and*
3. *an inventory of the types of values on public land.*

3. TERMS OF REFERENCE ADDRESSED

3.1 Assessment of the current system of public land use

It is the SSAA Victoria position that the current system of categorisation of public land in Victoria is too complex and confusing. The current structure uses a system of description that does not permit the average person to assess the types of activities which are permitted within land boundaries. This situation is due to the fact that information regarding the use of public land is difficult to source and usually out-of-date. Further, the descriptions of public land i) are not easily accessed, and ii) do not list or explain in layman's terms the types of activities which are permitted within defined areas.

The only exception is with regard to State Game Reserves, where no doubt exists that hunting is permitted for game species during the declared seasons.

Further, the situation exists where some activity is permitted during certain times of the year, but only in specified areas – again without adequate mapping or information which define areas and times where the activity is legal, for example in Eildon area where there is inadequate demarcation between hunting and non-hunting areas between the state forest and national park. It results in not only confusion, but also the potential for visitors to be charged with offences under the relevant acts for activities which they were unaware were not permitted.

The situation is unacceptable. 'Public land' should mean just that – that the land is available and accessible by the public of Victoria for recreation.

3.2 Assessment of the current reservation status of public land.

The current reservation status of some public land is demonstrably counter-productive, with the application and protection of conservation principles in those areas being overly restrictive, seemingly arbitrary and unnecessarily excluding of the public and hunters.

The current practice of allowing the parks to 'return to their natural state' is unreasonable. Forested areas in Victoria have had centuries of human impact and interference, both from indigenous sources and by way of European settlement. The reality is that to return these areas to their natural state would require the complete removal of the human impact over a very long time.

Further, there have been catastrophic consequences to the practice of reserving forest areas and limiting access to them. One example is the recent bushfires. The accumulation of fuel material within these areas facilitated the destruction of huge areas of native flora and fauna. Affected areas will take a long time to recover. The impacts may be exacerbated due to damage caused by increased populations of introduced invasive species which populate fire-damaged areas during regrowth.

Without change to the existing management practices it is likely that there will be reoccurrences of extreme bushfires, with potentially extremely deleterious impacts on native flora and fauna. The solution will not be simple. It will involve the adoption of Option 3 or Option 4 as outlined in the Draft Proposal Paper by VEAC.

3.3 An inventory of the type of values on public land.

According to the Victorian Government's Hunting and Game Management Action Plan 2014, *'hunting enhances the economic and social fabric of the State, with hunting generating an estimated \$439 million in economic activity and hunters being a vibrant addition to many rural and regional communities.'*

The future potential increase in hunting's economic contribution is important to consider in relation to the reservation and/or restriction to the use of public land use within this state. Consequently, because hunting has a quantifiable value to the state of Victoria it needs be considered as part of this investigation.

In addition to the economic value, there are a number of additional benefits which hunting contributes. They include, but are not limited to:

- awareness of the environment and the natural diversity of flora and fauna,
- participation in the biosecurity of the environment through pest animal control,
- management of game species to ensure their survival,
- preservation of crops and primary production through pest animal control,
- preservation of habitat for native species, and
- education of young people about the natural environment and the importance of its preservation.

4. COMMENTS ON THE DRAFT RECOMMENDATIONS

Based on a review of the draft recommendations contained in the draft Proposals Paper, it is the position of the SSAA Victoria in respect of the following:

R1. The revised and consolidated system of primary public land use categories and overlays in table 1, which forms part of this recommendation, be adopted.

The land use categories contained in table 1 are too complex. Based on the current restrictions they will exclude both the public and our members from a far greater area of public land. Consequently, this recommendation is not supported.

R2. Legislation be amended in the short term and new legislation established within five years to reflect the recommended revised system of public land use categories, to streamline implementation of government-accepted recommendations, and to improve management effectiveness.

The investigation into public land has been on-going for a protracted period. There is little value in introducing revised legislation for five years and then rewriting the same legislation with minor amendments. The current system and legislation need a complete overhaul as a matter of urgency, seeking community input. The recommendation is not supported.

R3 (a) to (h) The Crown Land (Reserve) Act be amended as follows.

This recommendation is supported on the following provisos: there be improved access for hunting of game species, pest species and feral animals in all national parks, state parks and state game reserves. It will improve the control of pest animals and assist in raising the financial viability of rural towns and centres within Victoria.

R4 Amend the Wildlife Act 1975 to remove requirement for further classification of areas reserved under the Crown Land (Reserves) Act.

As with R3 above, provided that hunting is encouraged and access for hunters improved.

R5 Standard regulations be developed for each land category in the revised system.

This recommendation is supported provided there be improved access for hunting.

R6 The Land Act and the Forest Act be amended to provide for all state forest to be administered under one Act.

As with R5.

R7 Office of Surveyor-General consider ways to simplify preparation of gazettal plans for reserves.

It would be worthwhile if the Surveyor-General also looked at the preparation of accurate plans and maps for designating areas to be used for education and use by public users of the land.

R8 Land in Aboriginal title and public land under joint management be designated through a legislated 'Aboriginal Land' public land overlay.

Support for this recommendation is provisional on such overlay not restricting public access to affected areas.

R9 Within five years, new protected area legislation be developed based on the existing National Parks Act.

This recommendation is not supported. This will over complicate an already acknowledged complicated system, by creating further categories and overlays that will confuse the public. Thereby further restricting public access to areas of land currently accessible for legitimate past times and hobbies, including hunting.

R10 Within 5 years, new land legislation be developed to replace the current Land Act and Crown Land (Reserves) Act.

This recommendation is not supported. If it has been identified that the current Land Act and Crown Land (Reserves) Act are out- of-date and require re-writing, it should be undertaken as a matter of urgency. Opportunity should be provided to comment on the draft land legislation at the time of consultation prior to the legislation's enactment.

R11 (a) to (c).

Provided there is no reduction in access by SSAA Victoria members and the general public, the recommendation is supported.

R12 Following a review of the number and types of coastal reserves outside the protected area system.

Provided there is a reversal of the current situation whereby amateur fisherman are not allowed to use these areas of coastal reserve for angling, the recommendation would be supported.

R13 Review values, uses and appropriate land category for State Forest where commercial harvesting of sawlogs has ceased.

Currently SSAA Victoria members and the public have *effectively* unrestricted access to state forest for hunting game species and feral animals. Provided the status quo remains the recommendation would be supported.

R14 An inventory of road and rail reserves be developed and significant native vegetation values mapped.

This recommendation is not supported. The expansion of road and rail network services - essential to the survival of Victorian cities and rural towns - would be hindered by such a recommendation as the state's population increases.

There is currently a network of services and reserves which will expand over time. To restrict expansion on the basis of an assessment of vegetation as it currently stands could be detrimental to state's development in the future.

R15 An inventory of state government-owned freehold land be undertaken to identify distribution and extent, ownership, and values and uses, and a register be compiled and maintained.

This recommendation is supported.

5. CONCLUSION

For too long the management of forested public lands within Victoria has hinged on the "lock it up" approach. The reasons given for this approach have been that forests should return to their natural state and that clearing reduces the nesting and habitat of species living within those forests.

Unfortunately such an approach has resulted in catastrophic bushfires, with an accompanying loss of human life and loss of the flora and fauna that public land managers were charged with protecting. These bushfires have been exacerbated by inadequate clearing of the fuel load within the forests.

Another unintended consequence of this approach has been the creation of sanctuaries for Invasive animals whose populations have increased to the point where they have been of significant detriment to both public and private land.

Further, improved management practices need to include allowing greater hunter access to Crown land.

Further considerations include:

1. Reduce the confusion associated with the name and description of the land, i.e. state park and state forest.
2. Improve mapping and signage of all public lands to better reflect the activities which are available.
3. Provide adequate signage at all land borders and within land.
4. Future management must centre on the public's use of the land. Improve roads and access to reduce the impact of bushfires and increase the public's awareness and appreciation of the environment.
5. Protect private holdings which border public land and sequester income generated from those holdings.
6. Decriminalise the transportation of firearms through public land by hunters and firearms owners.
7. Improve and increase access for hunters to currently forested public land areas. It will improve the biosecurity of these areas by controlling the populations of pest and feral animals.
8. Public land to be declared and promoted for game, pest and feral animal hunting. Hunting is non-invasive and has negligible adverse impact on the public's use of the land.