



Sporting Shooters Association of Australia
Victoria Ltd

Submission

**Victorian Environmental Assessment Council Act 2001
Central West Investigation**

for the

Minister for Energy, Environment and Climate Change

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1. ABSTRACT

The Sporting Shooters Association of Australia (Victoria) Ltd (SSAA Victoria) submission addresses the Minister for Energy, Environment and Climate Change's VEAC Central West Investigation.

The investigation is to:

- a. *identify and evaluate the condition, natural and biodiversity values and cultural, social and economic values and the current uses of public land in the specified area; and*
- b. *make recommendations for the balanced use and appropriate management arrangements to conserve and enhance the natural and cultural values.*

In addition to the considerations in section 18 of the Victorian Environmental Assessment Council Act 2001, the Council must take into account the following matters:

- (i) relevant State Government policies and strategies, Ministerial statements and reports by the Victorian Auditor-General; and
- (ii) relevant regional programs, strategies and plans.

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

1. in relation to a. : that the Central West Investigation recognize that hunters derive significant individual and group social and cultural benefits from access to public land for recreational hunting purposes; that hunters are significant users of state forests throughout Victoria, including the investigation area, and that hunters contribute significant value to the Victorian economy, especially in rural and regional areas.
2. in relation to item b. : that the Central West Investigation recommends that state forest status be retained for all current state forests within the CWIA; that recreational hunting be continued as an appropriate activity in all state forests within the CWIA where it currently occurs, and that any current restrictions on recreational hunting in state forests within the CWIA be removed.
3. Additionally, in relation to (i), that the Council make itself aware of the Victorian Government Sustainable Hunting Action Plan 2016-2020. Recommendations as to public land use should be made in light of the policy objectives relating to recreational hunting contained in that document.



2. BACKGROUND

2.1 Overview

The Sporting Shooters Association of Australia (Victoria) Ltd (SSAA Victoria) is a public company with 38,000 members. Its mission includes promoting the rights of firearms owners and advocacy to government, regulatory bodies and the general public.

Approximately eighty percent of its members hunt, with the 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. Under the terms of the MoU the 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 reviews of public land use where a change in land classification could either preclude or allow hunting to occur.

The SSAA Victoria submission addresses the Minister for Energy, Environment and Climate Change's VEAC Central West Investigation.

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. TERMS OF REFERENCE ADDRESSED

3.1 Identify and evaluate the condition, natural and biodiversity values and cultural, social and economic values and the current uses of public land in the specified area

State forests in Victoria currently provide opportunities for multiple use activities while maintaining the conservation values of public land. Those activities include both recreational and commercial pursuits. Hunting, fishing, fossicking, prospecting, four-wheel driving, trail biking, bush walking, camping, horse riding and mountain bike riding are some of the recreational activities currently undertaken in state forests. Timber production and bee keeping are two of the more common commercial activities.

National and state parks do not allow for many of the activities that are currently carried out in state forests. If state forests within the Central West Investigation Area (CWIA) were to be designated national or state parks, many current users would be disenfranchised. Such a decision would have a significant negative effect on those users' cultural and social amenity and their ability to partake in healthy outdoor pursuits. It is SSAA Victoria's view that where the current land classification in the CWIA is state forest, it would be the appropriate classification to retain.

The fact that state forests retain such high conservation values 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 it is not necessary to change it. 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. Suitable areas of public land, including state forest, available for hunting in the west of the state are already limited. The state forests identified in the CWIA are important hunting and recreational use areas for our members.

A report produced by DEPI in 2013 identified the economic impact of recreational hunting in Victoria.¹ It found that hunters injected \$439 million dollars into the state economy every year. While it would be difficult to extrapolate data from that report to the CWIA, the report clearly identifies that sixty percent of the \$439m, was spent in regional areas. Clearly, some of that benefit would be applicable in the CWIA. Restrictions or prohibitions of hunting in the area would remove that economic benefit.

While cultural and social values are difficult to quantify, they are nonetheless genuine considerations. State forests in the CWIA are important areas to many SSAA members, as well as others within the community, where social and cultural needs can be met. The ability for people to pursue recreational activities in natural areas is essential for their emotional and physical wellbeing.



3.2 Make recommendations for the balanced use and appropriate management arrangements to conserve and enhance the natural and cultural values.

As discussed, state forest status is the most appropriate designation for those areas in the CWIA that are currently zoned as such. Only state forest status allows for the wide variety of activities that are currently carried out in those areas. This status provides the best option for balanced use and conservation. A re-zoning to national or state park would preclude numerous activities and disenfranchise stakeholders. Such a change also has the potential to detract from the economic stimulus current user groups inject into the local economy.

Recreational hunting is continuing to grow in popularity. One of the main requirements of hunters is access to areas in which to hunt. State forests that currently allow hunting in the CWIA are a very important resource for SSAA Victoria members. Those state forest areas within the CWIA, where hunting is not currently permitted, should be reassessed to allow hunting to occur.² Hunting has been shown to be a safe, low impact activity that does not preclude other uses of state forest. In fact, recreational hunting can help in achieving positive environmental outcomes by reducing pest and problem animal impacts on natural environments.

3.3 Relevant State Government policies and strategies, Ministerial statements and reports by the Victorian Auditor-General

Key to the current investigation is the Victorian State Government's *Sustainable Hunting Action Plan 2016 -2020*.³ This plan outlines the government's vision for game hunting within the state. Of particular relevance to this investigation are sections 2.3, 2.4, 3.4 and 4.3.

Section 2.3 discusses monitoring the social and economic benefits of hunting in Victoria. Data obtained through this process may be relevant to the Central West Investigation in accurately estimating those important benefits.

Section 2.4 outlines the government's commitment to promoting regional hunting opportunities. The investigation should consider this objective if considering recommending other land classifications that may reduce hunting opportunities.

Section 3.4 outlines the government's desire to expand game hunting. Areas of public land in the CWIA not currently open to recreational hunting should be examined in light of this policy. Areas should be identified that could potentially be opened to hunting.

Section 4.3 outlines the government's commitment to developing a deer management strategy. This is particularly relevant to the Mt Cole State Forest and the opportunity for recreational hunting for sambar deer to be introduced into areas where it has been precluded in the past.

Note should also be taken of the report of the Parliament of Victoria's Environment, Natural Resources and Regional Development Committee- *Inquiry into the control of invasive animals on*



*Crown land Parliament of Victoria.*⁴ This report has a number of findings and makes recommendations regarding the control of invasive species on public land. Any VEAC recommendations regarding balanced use and appropriate management of public land should take into account those recommendations.

3.4 Relevant regional programs, strategies and plans.

SSAA Victoria is not aware of any specific regional programs, strategies or plans for the CWIA that are relevant to this investigation, other than those referred to above.



4. RECOMMENDATIONS

4.1 On the basis of the purpose of this investigation, it is the position of the SSAA Victoria that:

- I) all land currently gazetted as state forest within the CWIA be retained as state forest;
- II) all activities currently allowed in those areas, including hunting, be retained;
- III) suitable areas of public land in the CWIA, not currently open to unrestricted hunting, have restrictions removed and be opened to hunting, for example, hunting of sambar deer in the Mt Cole State Forest; and
- IV) no new national or state parks be declared within the CWIA.



5. CONCLUSION

SSAA Victoria strongly supports sound conservation management on public land, including, where possible, sustainable and multiple-use recreation and commercial activities. The Association does not support the creation of any new national or state parks within Victoria that reduces the recreational and hunting opportunities of its members. It is the view of the Association that well managed state forests provide adequate environmental protection while allowing for a variety of sustainable use activities, including hunting.

SSAA Victoria thanks the Victorian Environment Assessment Council for the opportunity to comment on the Central West Investigation and to put forward this submission on behalf of its 38,000 members.

The Association looks forward to the release of the Draft Proposal Paper.



6. REFERENCES

1. *Estimating the economic impact of hunting in Victoria in 2013*
DEPI RMCG Bendigo:RMCG Client Files:ROZI - 63:A-K:63-D-12 DEPI Socio-economic research on hunting and game management:REPORTS:Final:Economic impact of hunting FINAL 18 Mar 2014.docx
2. Sambar deer are not able to be hunted in Mount Cole State Forest. There is some legal ambiguity over the actual status of this land, however, the land is managed as a sanctuary for sambar. Other species of deer are able to be hunted, along with pest species. Information supplied by Game Management Authority telecon 9 August 2017.
3. *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)
4. *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)