



Staged repeal of *The Game and Feral Animal Control Regulation 2004*

This submission opposes the making of the proposed Game and Feral Animal Control Regulation 2012.

As drafted, the regulation will not improve the management of game animals, nor promote the humane and responsible control of feral animals.

1. Schedule 1 Part 1 Clause 1 Special provisions for licenses authorising minors to hunt unsupervised

My office has received hundreds of petitions and email messages opposing the move to allow children to hunt unsupervised. Many of the correspondents spoke of the danger to the children themselves, as well as other members of the public. The respondents included hunters who argued strongly that hunting should be restricted to adults, and feral animal control, to professionals. All submissions to my office demanded in the strongest possible terms that this retrograde provision be removed from the Regulation. I endorse their concerns.

The Greens contend that the provisions for children to hunt feral animals, even without a firearm, and without adult supervision are unacceptable. This concern is borne out by the requirements of Part 3 Clause 14 (1) (a) and (b) that requires parents indemnify the Game Council and State for the death or injury of their child, and for any damage to property, caused by their reckless involvement in hunting on public land. Clearly the risk to children is such that significant harm – and potentially death – is anticipated.

It is quite clear from neurological studies that children as young as 12 rarely have the social and emotional maturity to fully and adequately assess the consequences of their actions, and it has long been known that children lack the maturity of an adult when it comes to impulse control, ethical judgments and the ability to manage multiple sensory experiences in stressful and emotionally charged situations.

Given this, any proposal that would allow children between the ages of 12 and 17 to hunt feral animals with knives, pig dogs and bows and arrows is clearly unacceptable. The well-being of children would be at grave risk, as would the safety of members of the public. It would also increase the risk of subjecting animals to cruel and inhumane deaths.

Feral animal control is an extremely important issue for landholders and agriculture. However both the Nature Conservation Council and the Invasive Species Council have



expressed concern regarding the lack of credible evidence supporting recreational hunting as method of feral animal control. In the case of child hunters, this concern is magnified. There is not a single verified instance of amateur hunting effectively managing a feral animal population in any state forest in NSW to support this proposal.

2. Schedule 1 Part 1 Clause 4 (2) (c) (iii) Written permission to hunt on public land

The Greens are opposed to the proposal that a 48 hour period be provided for a person hunting on declared public land who has been asked to produce written permission from the land manager at the request of an inspector.

The Regulation 2012 should maintain the 2004 requirement that hunters on declared public land have written permission from the land manager at all times, and produce a copy of this permission upon the request of an inspector.

This change enormously increases the risk of unlicensed individuals discharging weapons on public land, and is an unacceptable threat to public safety.

It is a far from onerous requirement for a hunter to carry a slip of paper giving them permission to be on the land they are hunting on.

3. Schedule 1 Part 3 Clause 14 Use of dogs for hunting pigs on public land

The use of pig dogs to locate, hold and bail pigs clearly breaches the draft Regulation 2012 Schedule 2 Mandatory provisions of Code of Practice (5) *Obligation to avoid suffering*.

The Regulation 2012 should be amended to ban the use of dogs on the grounds that they inflict unnecessary suffering on feral animals, and are a significant threat to public safety.

The modest improvement in radio tracking is not matched by any commitment from the government to resource compliance. As such it is likely to be ignored by many amateur hunters.

4. Part 1 Game Council

It is notable that these regulations have the strong support and endorsement of the Game Council. This is not surprising.

The Game Council of NSW, a body that was supposed to be self funding, has received \$14.5 million since inception, and an average of \$2.9 million a year over the past four years. The Game Council promotes so-called 'conservation hunting' that is carried out by



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amateurs, and has minimal effect on eradication of feral animals and produces needless animal suffering.

Eight of the sixteen members of the Game Council are nominated by shooting organisations. A conflict of interest is built into the very structure of the body as it functions to represent the interests of licensed hunters; to administer the licensing system which polices them, and also makes recommendations to the Minister on the administration of the system.

The Game Council has been thoroughly discredited for its compromised and partisan stand on hunting issues, and should be abolished.

I look forward to your acknowledgement of receipt of this submission and to advice as to your final determination on this matter.

Kind regards,

A handwritten signature in black ink, appearing to read 'D. Shoebridge', written in a cursive style.

David Shoebridge
Greens NSW MP