

**From:**  
**To:** [Public Administration Committee](#)  
**Subject:** Inquiry into the potential environmental contribution of recreational hunting systems -submission  
**Date:** Wednesday, 8 January 2014 4:22:21 AM

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The Honourable members of the Committee,

I would like to offer my submission to the Committee.

The terms of reference are that –

That the Council -

(a) acknowledges the use in other States of regulated, licensed recreation hunting systems and the potential environmental contribution made in controlling pest animals on public lands, together with the possible economic, cultural and recreational benefits to the community; and

(b) directs that -

(i) the Public Administration Committee inquire into the benefits or otherwise of a similar system being adopted in Western Australia and report back to the House by 4 December 2014; and

(ii) Hon Rick Mazza be co-opted as a member to the Public Administration Committee for the purposes of the foregoing inquiry.

In my submission, I would like to consider these in their order of reference.

a) Other States Systems.

There is no evidence that other States recreational hunting systems have made any environmental contribution to controlling pest animals, other than for a few small and valuable areas. In the main, the systems themselves have resulted in the loss rather than gain of any public benefit in the control of most pest animals, by allowing hunting to be regulated to maintain pest animal numbers, rather than reduce them. If we consider the numbers of deer, feral pigs, foxes and feral cats removed by recreational hunters in Victoria, none of these has come anywhere near the required take of at least 60-70% required just to maintain numbers at their current level. None of the acknowledged experts in the field of vertebrate pest management support the notion that recreational hunting on government land has any benefits to controlling vertebrate pests and there are many negatives.

I have considerable experience in the control of feral pigs on government lands. During the 1980's I was responsible for a considerable amount of forest to control feral pigs with the Agriculture Protection Board (APB). By far the greatest costs I had was the disruption of feral pig trapping and poisoning programs by hunters. A considerable amount of effort is wasted when illegal pig hunters (or in this case it will be legal hunters) disrupt a free feeding program which could have resulted in up to 40 feral pigs being trapped or poisoned. The single pig that the hunters catch can disperse the pigs from the site. The capture of one pig disrupts the removal of 40. This is still the same today, where even on our own leased land, pig hunters will steal cameras, damage pig traps and cut fences to access properties to the detriment of our control programs. As the State project manager for feral pigs and foxes with the Department of Agriculture (now DAFWA) I did not support the use of recreational shooters on government land as it simply disrupted strategic management programs.

Recreational hunters are variable in their views, ethics and abilities. This will inevitably mean that many (most) are less effective than professionals. Their views, obligations, training, equipment and experience will differ. I have seen this first hand where sporting shooters have used sub-calibre firearms on feral pigs and deer. They will use what they have, not what is required professionally. Whilst it can be argued that "most" sporting shooters will "do the right thing" it is not their profession, so the likelihood of them being proficient, effective, science based and responsible are far diminished compared to those professionals. I have witnessed firsthand amateurs that have been out hunting large deer, with calibres as small as the .204 Ruger. To shoot a deer the size of a Red Deer with such a small calibre is a terrible injustice to the notion of animal welfare. Our professional programs conducted on deer have been disrupted by amateur hunters to the overall detriment of the program's success. And in my view, it is detrimental to ethical firearms ownership, which adds a burden on us by relationship.

The additional costs to the public will come in the form of increased firearms licensed. Should using firearms on government land become a genuine reason to own a firearm, there will be a huge increase in the number of firearms owned in WA. This has occurred in Victoria and NSW. There is a significant cost to this in administration of the firearms registry, theft of firearms, illegal use, animal welfare, and public safety.

Consider the view of a former WA Government Wildlife Officer –

*"You could even get a gun license thru police with just a duck license from Forest dept - because it showed you had somewhere to legally use it."*

This will be the case in WA if use of firearms is allowed on government land today.

So even though the laws of WA are that many pests on government land are a problem, consider this from the former government officer responsible for their enforcement –

*"The downside of this, is that it is NOT legal to carry a firearm any longer on most of this now vested land. (i.e National Parks, State Forests, Flora Reserves, Fauna reserves etc and so on).*

*These are the very areas where the deer that do exist sleep and water etc during the day before they go out into neighboring land owners improved pastures paddocks at night to feed!*

*So the difficulty is - that its largely impossible to get a permit to carry a firearm in State forest (I used to issue the permits).*

*So there's the next problem for you to overcome - how do you get legal access to the land on which the deer live?*

*In short - its neigh on impossible.*

*So as a result - much of the secret squirrel society hunting of wild deer in Oz (if it doesn't occur with land owner permission on farms) occurs in state forests without landowner permission.*

*There are permits available but its a matter of dept policy not to issue them (to anyone but their own staff - again i held the corporate firearms license and issued the permits in a former life).*

*In truth the Forests people would prefer to see the deer gone, remembering they aren't protected they are declared vermin to be shot on site by Govt rules / laws, its just that its not legal to carry a firearm into the forest where they reside to shoot them.*

*As the local wildlife officer - I didn't waste my time looking for deer hunters with firearms in state forests - I had better things to do with my time, and to be truthful would deliberately look the other way if I knew someone was getting themselves a deer for the wall or freezer. However times have moved on and newer younger more zealous wildlife officers abound these days looking to get any conviction they can in order to justify their existence. So I cannot in all conscience suggest that you go break the law to bag a deer.*

*What MANY do, is be extremely discrete about your activities in the forest! Look like any other bush walker, no cammo gear, a checkered flannel shirt in dull greens and browns is just as effective, but doesn't signal "illegal gun carrier in state forest" No need to have Paul Hogans "That's a Knife" machete strapped to your leg, - no bandoleers of 500 x 30 ought 6 rounds strapped across the chest like a Mexican bandit.*

*Most guys just dress like the local farm boy, but choose your colors and pattern to work the same as camo gear. Many do their pre hunt reconnoitering unarmed.... work out where your watering and bedding and feeding areas are going to be for the upcoming rut. Its not illegal to drive you 4wd around the bush or walk around checking out places.*

*On the day of the hunt - many will just get dropped of at 3.30 am with rifle and simple day pack - and walk in - do the business with one clean shot kill - ad arrange a pickup via mobile phone after dark in a lonely deserted spot.*

*Those with high and mighty ideals like to call this behavior "poaching" as tho all the deer belong to the king like back in Robin Hoods days.*

*The facts are, that if you don't get caught, because no one sees or hears you, and you don't come to the attention of the local forester / wildlife officer by your behavior - you can have a long and and successful deer hunting career in WA, - but they key thing is be discrete!*

*If you want to strap the buck to the bonnet, and wear your cammo gear & 4 ft long knife, into the local shop while you fuel up, you better guess that the local shop keep is going to be on the blower to the local wildlife forester guy with all your details while your still fueling up.*

*Keep your firearms out of sight, look like a local farmer of fisher or something, take the deer home to hang it inside your shed to skin it out, and don't let everyone see what your doing.*

In this case, should the law enforcers be audited? I am well aware that DPaW and DAFWA staff use their position to improve the knowledge to selected hunters. Here we have a former government Wildlife Officer accepting that he would and did ignore illegal activity and is currently actively suggesting how to circumvent law. In my view this is tantamount to aiding and abetting. What chance have we to enforcing shooting on government property by amateurs when a former Wildlife Officer blatantly states to the world that he ignores and actively encourages how to conduct an illegal activity. Certainly there is the suggestion from NSW that even the enforcers become one of the hunters.

Consider the scenario. Culling of horses is a very topical and emotive issue. There are very good reasons for it to be done at the highest standards possible. Amateur shooters start shooting horses in a National Park. They may, or may not use firearms of adequate calibre. Horses are being found bullet ridden and still alive after being shot numerous times with inadequate firearms. Not only does this have an impact on the horses, but has a detrimental impact on the professional culling operations to be undertaken in the future because of the

(understandable) public outcry. Far fetched? No. I am aware of many instances where amateur shooters have decided that the camel culling is something they want to “be in on”. In one case, a shooting party informed me that they “used whatever rifles they had” to shoot camels, on all the roads and tracks they could drive on in 4 weeks, all of them shot with less than the minimum required for various Codes of Practice. Animal Welfare was not a consideration – they bragged about the high number of small calibre shots they used for each camel and horse shot. This was on Crown and Aboriginal Land. If you honestly believe that opening this government land up to recreational shooters will achieve anything other than simply more shooting for no demonstrable result in reductions in overall feral animals, then you are swayed by votes rather than science and the welfare of the animals. Shooters will – if they have a .223 – shoot at horses – if it is legal for them to shoot on government land, regardless of the animal welfare obligations. You cannot control it. If you pull them up (unlikely), they will say they are shooting rabbits or foxes or wild dogs. We cull feral donkeys, horses, camels etc. But as professionals, we are subject to loss of our income, our hard earned reputation. We are in the public eye. A weekend shooter is not.

In so far as the actual costs of “commercial” feral animal control, I have been in this business for 15 years, I have 33 years full time professional experience, with the remainder of years n government. I am very well versed in the “commercial costs” of feral animal control, as that is essentially what keeps me in business every day.

In a recent email to the Honourable Rick Mazza, I have said –

*“Hi Rick,*

*I voted for you in the last election, so hope you keep up the good work. However, I must take you to task over one of your media statements.*

*I note with interest that you have said, and I quote –*

*“The commercial cost to remove wild dogs is \$5000 a head. It is \$500 a head for wild deer, \$300 a head for feral pigs, \$100 a head for feral foxes, goats and cats, and \$10 a head for rabbits,” Mr Mazza said.*

*I don’t know where you get these costs from, but they are not “commercial cost”.*

*A dogger should be able to get an average of 1 dog trapped per day. With baiting, this will increase the number controlled dramatically. To take just trapping, at a commercial rate of \$400/day (the average cost charged by a dogger), that equates to \$400 per wild dog. That is much, much less than the \$5000 you quote. Of course, if I am only to chase 1 dog in sheep country, the cost per unit will go up, but the benefit/cost is substantial.*

*For foxes, it can cost around \$500 per fox to trap a fox in a high risk, inner metropolitan reserve. On average, the cost of baiting foxes is far less, with baits costs \$0.80. I have trapped 3500 foxes in the past few years, meaning at your costs I would have earned \$350,000. Our average bait take is 80%, so with 200,000 baits used in the past 10 years, that would equate to \$16,000,000 in income I should have generated on your figures. I wish.*

*I am capable of baiting 6km of trail per hour for rabbits. At \$100 per hour, plus \$15 for poison per km, this equates to a cost of \$31.66 per km. Given that there is the potential*

*for 440 rabbits to die from the 1080 per km, this would equate to a potential cost of \$0.07 per rabbit. If we took it that there were only 50 rabbits per km that still only equates to a cost of \$0.63 per rabbit, a far cry from you figure of \$10.*

*Costs for culling large feral herbivores (camels, donkeys and feral horses) is around \$53 per head. Commercial rates. My very recent figures from a real life commercial program.*

*When it comes to feral pigs, the greatest cost we have is our efficient programs being disrupted by illegal pig hunters. This is a cost we need to bear, so that adds to the "commercial cost". How would you like your tools of trade being stolen and damaged by "hunters"? And on your own property? Yes, traps destroyed, cameras stolen, fences cut, this is your so called responsible hunters. How would you like it if I came and stole your computers and damaged your personal car, opened the gate at home and let the dogs out? Yep, I don't suspect you would be too pleased. So how about putting your efforts into stopping this being done by the people you "represent"? Hunters.*

*In most cases, shooting (regardless of who does it) is the least effective and least efficient of all. As we review each program and determine the most efficient method of control, we are better able to identify the most effective methods to get the best bang for the buck.*

*I am not opposed to hunting per se, but I am opposed to those who push only one method which is the amateur shooter. Perhaps if you put your efforts into sensible firearm licensing for those who do it for a living, those who are trained and qualified, those who need it most, I would be more comfortable. But there is deafening silence from you."*

In many cases, it can be argued that the "benefits" to the community (gun sales, fuel etc) can be offset by the employment of professionals, who may well struggle financially trying to compete with less qualified and experienced amateurs out for a weekend shoot. In my own company, I employ 9 people. That is 8 families who rely on this as income. I generate \$1,000,000 back into the community. Yet the loss of this work will mean not only that loss, but the valuable contribution we make in other programs for conservation, such as the protection of endangered native fauna. Professionals such as ourselves do our work based on the most effective and efficient means. We cannot compete with a free service, even if theirs is only by shooting and ignores the most cost effective, humane, efficient program. Why pay a professional to do a professionals job, when you can have anyone with a gun come out on the weekend and blaze away? A similar argument currently exists with so called "professional kangaroo shooters". Most are shooting fewer than once a month. As I have "competency tested" to DPaW standards many of these shooters, I can tell you that very few can shoot a kangaroo cleanly through the brain at 100m with 5 out of 5 shots. Many take more than 25 shots to pass the test. Some have taken more than 75. That equates to lots of kangaroos with head wounds hopping around. And these are people applying for a "professionals license". Even if the SSAA where to have some form of test, it will be in their interests to show their "best foot forward". They will not be willing to show how many of their members fail a reasonable test. I have had the

SSAA WA champion for “running boar target” out shooting feral goats with me. Presuming he is the WA champion for shooting at moving targets, one would assume he was pretty good! Well, after the first hour, my view was that he should only shoot paper targets. He would never get hold of a firearm with me as he could not adequately demonstrate humane shooting practices.

There are arguments in the scientific literature on the benefits or otherwise of recreational hunting. The view taken by us is that there is little or no scientific evidence that recreational or amateur shooting has any demonstrable benefit for conservation. The oft termed “green benefit” for recreational shooting, such as the “conservation shooting” term has no benefit other than suggesting that recreational shooting benefits conservation. The fact that there is no evidence that the numbers of animals shot in almost all of these programs has little overall reduction in pest animals, let alone any conservation benefit speaks for themselves.

Mr Mazza has said that –

*"I appreciate that hunting can be controversial, but in reality conservation hunters have done a considerable amount to save Australia's endangered species."* There is no evidence to support this statement. To suggest that in Victoria, where hunting on government land has been in place for some years, that the numbers of foxes or feral cats shot by hunters has any impact to the benefit of native species is either a lie or is a distortion of the truth. Indeed, deer numbers have increased along with the environmental damage they cause. For the cost of \$55,000 we have 100% protected loggerhead and other endangered turtles at Gnaraloo Station. This could not be done by “conservation shooting” as it is impractical to do so. When shooting feral cats, it is common to only see one every 20 spotlight hours. Taking the same with foxes (we have only seen 2 in 20 nights at Gnaraloo) shooters would suggest they could shoot their way to fully protecting the turtles at Gnaraloo. The evidence clearly shows it cannot be done. I challenge Mr Mazza to demonstrate scientifically that, other than at very small targeted locations, that anything has been achieved in conservation values as a result of the shooting on government land in Victoria or NSW for effective conservation in the past 3 years.

In so far as the view that shooters are conservationists, a comment by a former WA government Wildlife Officer sums it up in regards to deer in WA–

*It's taken a full generation of hard work and expense by a dedicated but small band to get these herds established. There whereabouts are closely kept secrets among a band of like minded brothers.*

*The laws are very unhelpful in our case, and many of those charged with the responsibility for enforcing them, recognize that and tend to be happy to look the other way, just as long as we aren't getting written and verbal complaints from every man and his dog, about a bunch of red necks shooting the place up!.*

If there is any other comment that suggests that there are persons who will try to ensure their shooting interests are protected, then this is it. A former government Wildlife Officer from DPaW is saying to the whole world get out there and shoot on their National Parks etc, just do it discrete! Now change that to another 10,000 or 50,000 or even 81,000 hunters in National Parks in WA and what are we going to have? Are we going to be able to effectively control feral deer in National Parks when there are untold number of people with guns, with dubious abilities and guns wandering around, with government people “happy to look the other way”? I am not even sure I want my professional people exposed to that degree of risk.

In my programs, I can state that 100% protection of turtles was achieved at Gnaraloo, we reduced rabbits by 94% along the Perth metropolitan foreshore, we increased Bilbies by 400%. Shooting some ferals is more

than that. If the shooting party can offer more than just shooting a few (that may be surplus and die anyway) and demonstrate some actual achievements of objectives, then they may be taken seriously. Otherwise their "green" credentials have no evidence base.

Quite simply, there is no scientific evidence or even reasonable evidence to a knowledgeable person that the opening up of public and government lands to recreational shooters will contribute in any positive way to the real reduction in feral and introduced pest animals. There is evidence to suggest that this will lead to an industry supporting the "management" of these species, similar to the failed bounty systems of past years, except with the increased industry pressures associated with the firearms retailers along with the substantially increased sporting shooters membership. One needs to consider that they was the recent view that the Genuine Need test for a firearm license was suggested by the SSAA was for membership of the SSAA be considered as a "Genuine Need" and that this be required every 12 months (as per their membership period) rather than the current requirement for a letter from a primary producer. It would be evident that there would be a need to be a member of the SSAA to be able to shoot on government land, which is a similar requirement to NSW. My understanding is that a proportion of this membership fee goes towards the Shooters and Fishers Party. In our view, we are not "Sporting Shooters" and therefore oppose the need for membership to a Sporting Shooters Association just to be allowed to shoot on government land. We are professionals, not "Sporting Shooters". **We strongly oppose the view that any recreational shooters should be able to be licensed to shoot on government lands.**  
**We are, non-political in our view.**

In my view, there is plenty of evidence that this will lead to a reduction in animal welfare outcomes, increased risks, as well as contribute to the interference of effective, strategic based, outcomes focussed management programs already in place.

I would be happy to attend the Inquiry to discuss these matters further

Yours sincerely

*Mike Butcher*

