Permit principles

A standard operating procedure for assessing property protection permit applications.

Background

In granting property protection permits pursuant of the *Nature Conservation Act 2002* Game Services Tasmania (GST) as a group must undertake the task consistently and deliver consistent messages to clients. Clients and the general community must have confidence that wildlife is being sustainably managed while protecting agriculture, forestry and conservation interests.

Taking wildlife by any means for any reason is receiving more intense scrutiny from community stakeholders so it is important that GST has defendable processes that clearly demonstrate that property protection permits are issued responsibly and that wildlife species are being sustainably and humanely managed.

Overarching principles

Property protection permits are issued for the specific purpose of "protecting crops or stock or both" and to "protect equipment or infrastructure or both used in the production of crops or stock" (Regulation 34 *Nature Conservation (Wildlife) Regulations 2021*) from wildlife. Moreover, the applicant must be "likely to suffer financial loss if the crops, stock, equipment or infrastructure are not protected" (Regulation 49 *Nature Conservation (Wildlife) Regulations 2021*)

In this sense a crop can consist of annual or perennial plants used for direct human or consumption by stock, so pastures are considered crops and in fact are the crop that makes the largest economic and product volume contribution to Tasmanian agriculture as well as occupying the largest proportion of the land used for agriculture.

It is not acceptable to issue a property protection permit in a situation where browsing wildlife species are present but are not causing or are not likely to cause any damage to crops or stock. An example may be sulphur crested cockatoos that are known to damage poppy crops being present in an area growing poppies but they are not causing any damage to the poppy crop.

The presence of a population of wildlife capable of damaging a developing or emerging crop at which time it is very vulnerable to destruction by any browsing wildlife can be assessed as a legitimate situation for early intervention by issuing a property protection permit.

Non-lethal methods of management must be considered before issuing a permit that can result in death of animals but such managements must be physically and financially viable.

Documentation of reasons

When granting a permit it is essential that the reason for doing so is reported on the permit upon granting in Pepperberry. This reason must relate to crop protection and be specific by recording the wildlife species, an estimate of their number present doing the damage and attempts to manage them using non–lethal controls. It should also refer to the specific crop being damaged and the

likely financial impact of the damage. It should also record any discussions the GST officer had with the applicant regarding using non-lethal or deterrence strategies as alternatives to lethal control.

It should be remembered that lethal control has two outcomes being reducing the population of a species in an area and deterring members of that species from frequenting the area where the control is being used. The latter is very important because it is both ecologically undesirable and impractical to kill sufficient numbers of a local population to reduce its browsing impact to being negligible.

Justification of take number

There is a perception that property protection permits are too easily obtained and that applicants get the take number they request, therefore that number has no scientific underpinning. The ongoing challenge for GST is therefore to be able to justify the take number allocated to a permit and to be able to show that the long term sustainability of a population (locally and state wide) is not being compromised by the take.

How do we set take numbers for the various species?

This is a challenge with the best resource we currently have being the long-term spotlight surveys for mammals and the long-term waterbird surveys for species such as ducks and swans. Unfortunately we have little other than anecdotal information on species such as yellow tailed black cockatoo, corellas, rosellas, silvereyes and swans so the take number for these has even less scientific underpinning.

Assessment officers should attempt to estimate the numbers of the wildlife species doing damage and to compare this with such estimates provided by the property protection permit applicant.

Conversations with the landholders and/or property protection permit manager and/or hunters as well as contract or commercial shooters are useful in determining the appropriateness of the requested take number. Discussing the species abundance, behaviours and impacts is important. Further, property inspections allow GST officers to gain an understanding of the local population and impacts. . It may be necessary to undertake a local survey (including spotlight) to determine abundance of the species.

Dealing with long lived species about which we have limited biological understanding is a challenge because there is a long lag time between management intervention and observed population impact. In these circumstances biological understanding together with regular monitoring are critical inputs into determining take. It is also important to relate previously approved takes to the current observed damage and abundance of the wildlife species on the property and regionally.

Some species such as ducks move between several states so conditions in areas outside Tasmania need to be considered when determining take. Ideally such species should be monitored using a national and a local system and their take influenced by the ecology of their complete range rather than a subset such as that encompassed by a political border or property boundary.

Permit decision trees.

There are two dimensions to a property protection permit namely its granting and its associated take quota which should be considered separately as components to the overall crop protection permit decision.

Permit or no permit

1. Confirm presence of the target animal (observe scat numbers and types, footprints and other species specific signs) on the property for which a property protection permit is being sought. Check the Natural Values Atlas (NVA), use personal and GST team knowledge and consider conducting a property inspection. The NVA can provide some guidance but should not be over relied on as observations may be a product of local interest and the provision of observations could be distorted if locals think such observations will interfere with their land use.

If present – proceed to 2.

If not present – No grounds for issuing a permit. Permit application declined

2. Is the target animal causing browsing damage or likely to cause it as a crop emerges? (Consider personal knowledge, property history and potentially conduct a property inspection.

If Yes – Document damage and attempt to quantify it. Issue a property protection permit

If No - No grounds for issuing a permit. Permit application declined.

Setting take quota

What is the abundance of the target animal on the property, local region and state? Check Natural Values Atlas, personal and GST team knowledge and population trend monitoring on state and local basis. Check previous take quotas in Pepperberry for the property of interest and for neighbouring properties.

If sustainable and resilient population issue a take quota based on above assessment

If unsustainable and resilient population issue a take quota of 1 or 2 to enable shooting to be used as a deterrence. However, bear in the mind the risk of establishing a dishonest relationship with the applicant who may take as many as they wish, always pretending it is the 1st or 2nd take. Ongoing communication can help prevent such a scenario

Permit period

The permit period is set by the assessing officer as a balance between allowing the applicant sufficient time to manage the browsing wildlife problem without undue administrative burdens and ensuring the issue is reassessed within a practical time through another permit application. Generally permit periods are set longer for more abundant species such as wallaby, possum and antlerless deer.

Permit period can be adjusted to encourage the best outcomes with the least take and public concern. For example, a long permit period for birds (12 months) will allow swift action throughout the year to move birds on before they settle thereby reducing the number that need to be killed. . A short permit period may be chosen to limit the time killing can be used to reassure the public that action is limited and controlled. This is applicable if a species only causes damage when the crop is at a specific development stage such as ripening fruit. 1080 permits are limited to a month and bait lines are enforced to ensure neighbours understand 1080 is used in a very limited window.

Other issues

The following issues should be considered when assessing an application for issuing a property protection permit.

Use of non-lethal deterrence strategies.

The best known and understood strategy in this suite of tools is fencing to exclude ground dwelling mammals. The effectiveness of other methods particularly associated with bird management are largely unknown or of variable effectiveness such as gas guns. The assessor should note applicant attempts to deter and their relative success. The best outcome can often be achieved by using a combination of lethal and deterrence strategies.

Community sensitivities

As discussed above there is increasing community sensitivity regarding killing wildlife from the perspectives of population sustainability and ethics. Assessors need to note this and explain to applicants the need to abide by permit conditions and to manage the visibility of wildlife control strategies.

The use of gas guns as a deterrence strategy can result in significant neighbourhood tensions particularly where there is a significant peri-urban lifestyle community.

Other legal and policy considerations

Firearms cannot be discharged within 250m of an occupied dwelling without permission of that occupant so permit assessors should bring this to the attention of permit applicants and ensure they understand that the permit does not override this aspect of the firearms regulations.

The 1080 policy as articulated in the 1080 Code of Practice needs to be considered if the use of this poison is contemplated being approved.

Wildlife control is generally not permitted on areas subject to conservation covenants so check the status of land to which any permits apply prior to them being issued.

Non-target species

The presence of non-target species and the likely impact of the control method on them needs to be considered as part of the approval process.