

S00108 – Matt

To whom it may concern,

My disagreement pertains to proposed changes to the Biodiversity Conservation Act (2016), wherein the discussion paper for proposed changes to wildlife licence classes seeks to mandate the following (page 15, section 4.2, Landholder's licence to harm): "standard licence conditions include ... if shooting occurs within one kilometre of an adjacent property, at least 24 hours' prior notice must be given to local police and NPWS offices and adjacent neighbours."

This new condition will undoubtedly deleteriously affect the vast majority of landholders given the shape and size of most allotments in proximity to neighbours' boundaries, and whilst it comes across as yet another well-intentioned regulation, it will undoubtedly become an onerously impractical regulatory burden on landholders who have managed to shoot (under firearms' licences own sensible guidelines and practices) without these added conditions till now. Foremost, shooting forms a quasi-opportunistic activity, one whereby a landholder could destroy pest animals (namely kangaroos approved to be culled via LLS) should the animals be visible and safe to destroy at an opportune moment. These opportunities occur regularly alongside day-to-day activities, and ease the need to pick dedicated periods to undertake an otherwise routine activity. The only means of continuing such activities in light of the proposal would be to daily spam all aforementioned parties via email 365 days a year should a landholder wish to retain the same convenience. Consequently, having to notify the aforementioned parties 24 hours prior to any shooting activity removes these valuable opportunities. Furthermore, it's unfathomable the burden this will place upon all enforcement parties in the case of notification. Should all landholders adhere to the letter of the law, statewide on a daily basis, this will doubtlessly add to a growing pile of aimless busywork these bodies needn't concern themselves with.

Having discussed the above, this recommendation initially presents as an inconvenient planning-laden and time-consuming burden on landholders, as well as enforcement agencies capable of spending the same time more productively on matters of real gravity. Even from a public wellbeing perspective, this recommendation appears as an unnecessary safety-mandated double strike against firearms' holders, who have by virtue of operating those firearms the skill and know-how to avoid causing harm, damage or injury to another's self or property. I'd kindly recommend this provision be removed entirely, or as a compromise at the very least have its application restricted to peri-urban, urban-rural areas, or smaller landholdings such as hobby-farms, as opposed to placing a blanket regulatory application across landholdings of all sizes statewide. As it stands, this appears as an ill-considered proposition put forward by an entity far removed from the on-ground operations of any medium-to-large farming enterprise facing pest animal challenges.

Thanks in advance for your consideration

Ps. Our enterprise received mail notification of this review only 4 days prior to close of public consultation and commentary. I'd further recommend an extended minimum consultation period for landholders (at least a month) to be able to properly review such proposals, lest your organisation may forego recommendations from those impacted by proposed changes. This is, after all, an incredibly difficult year, and finding time to read through and write this was hard enough without the slim 4 day time-frame.