

12 Kallista Avenue
St Ives NSW 2075

13 June 2006

Committee Secretary
Environment, Communications,
Information Technology and the Arts Committee
Department of the Senate
PO Box 6100
Parliament House
Canberra ACT 2600



Dear Secretary

Re: Letter from Dr Kelly Miller and Assoc. Prof. Darryl Jones

I was surprised and concerned to be advised of the Committee's decision following a private meeting to publish on the Inquiry website the letter from Dr Miller and Assoc. Prof. Jones purportedly clarifying the findings of their 2005 paper which I cited in my submission.

The Senate Committee inquiry instructions state that a submission may contain facts, opinions, arguments or recommendations. There was no indication that comments on submissions would be accepted or indeed published; if it is the Committee's decision to publish comments on submissions, then in the interest of transparency all comments should be published.

I believe my submission contained factually and contextually accurate citation of Miller and Jones' 2005 paper. Publication of Miller and Jones' letter indicates that their claims and comments have been accepted by the Committee at face value without critical appraisal for the accuracy or truth of these claims.

I disagree that Miller and Jones' letter clarifies the findings of the study I cited but rather it confounds and confuses understanding of the cited paper by introducing the findings of "another study" which I did not cite in my submission i.e. Miller 2003 and Miller's unpublished PhD thesis.

As is customary in public scientific debate I seek the right of reply and request publication of my enclosed response on the Senate Inquiry website adjacent to Miller and Jones' letter so that interested persons and organizations may consider both points of view.

Yours sincerely

A handwritten signature in cursive script, appearing to read "Stephen Larsson".

Stephen Larsson
Tel: (0407) 978 655

Attach.

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Dear Secretary

Re: Letter from Dr Kelly Miller and Assoc. Prof. Darryl Jones

The letter by Miller and Jones purports to clarify the findings of their 2005 paper which I had cited in my submission. Their letter however does not clarify but rather confounds and confuses the findings of the cited study by introducing the findings of "another study" i.e. Miller 2003 and Miller's unpublished PhD thesis which I did not cite in my submission.

Claim: ". . . Larsson has focused on a narrow set of statistics from this work and ignored the bigger picture."

Response: The findings in their 2005 study that I did not refer to in my submission are not in dispute and as an ethical hunter I agree '*It is ethical for society to restrict human activities to minimize negative impacts on wildlife*' (when it is scientifically justified and appropriate to do so); '*Minimizing animal pain and suffering should be an important consideration in wildlife programs in Australia*'; '*Anyone who uses wild animals in some way should be concerned about pain and suffering of those animals*'; and '*Wildlife managers should understand public and interest group values and knowledge of wildlife before developing management programs*'.

I saw no reason in my submission to comment on the findings regarding pain and suffering as these are accepted 'standard practice' by all ethical hunters. Miller and Jones seem to be unaware that all NSW Restricted game hunting licence holders must, under the *Game and Feral Animal Control Act 2002* and *Regulations 2004*, abide by a mandatory Code of Practice which includes strict adherence to animal welfare principles. There are fines of up to \$5,500 for non-compliance plus suspension or loss of licence. Licensed game hunters must also abide by relevant requirements of other legislation including the *Prevention of Cruelty to Animals Act 1979*, the *Crimes Act 1900* and the *Firearms Act 1996*. Furthermore, statements on minimizing pain and suffering are incorporated into the codes of ethics and practice of most hunting clubs in Australia; failure to comply results in disciplinary action including suspension or cancellation of club membership – a mandatory requirement for continuing to hold a Restricted game hunting licence in NSW.

For Miller and Jones to then introduce the findings of "another study" (i.e. Miller 2003 and Miller's unpublished PhD thesis) that I did not cite in my submission is inappropriate, especially for employees of academic institutions. The other study referred to is irrelevant in the context of clarifying the work of theirs that I did cite.

Nevertheless, close examination of Miller 2003 reveals dubious scientific rigour in the study methodology. Firstly, the sampling frame is flawed by ascertainment bias* as it is skewed heavily towards, as the author states "selected" wildlife management stakeholder groups. Four of the six stakeholder groups have declared anti-hunting policies i.e. the Australian Conservation Foundation, Field Naturalists Club of Australia, Bird Observers Club of Australia and Royal Society for the Prevention of Cruelty to Animals. While the respondents within each of the six wildlife management stakeholder groups may have been randomly selected and representative of their respective group, their views are not representative of all wildlife management stakeholder groups, especially those supporting sustainable utilisation. One can only speculate on the results, discussion and conclusions of the survey if the author had sought balanced representation of stakeholder groups for, and against hunting/sustainable utilisation.

Secondly, there are unexplained discrepancies in the sample size for 10 of the 13 groups (by up to 4 respondents) between Miller and Jones' letter which refers to Miller's unpublished PhD thesis and the published paper Miller 2003. It is important to know whether the respondents unaccounted for were in the 'Agreed', 'Undecided' or 'Disagreed' category or simply whether they did not respond to the questionnaire statement '*Recreational hunting is cruel to animals*'. Four respondents could have accounted for up to a 3% difference in response, for example:

<u>Stakeholder Group</u>	<u>Miller 2003</u>	<u>Miller/Jones' 2006 Letter</u>	<u>Absolute Difference</u>	<u>% Difference</u>
Parks Victoria	n=142	n=138	4	3%

A 3% difference in response for the Parks Victoria group arguably could have shifted the equivocal response reported in their letter to a (narrow) majority response either 'Agreed' or 'Disagreed' with the statement. Miller and Jones' letter also fails to explain the nature of, or the reason for these discrepancies which confounds and confuses understanding and interpretation of the true 2003 survey results.

Thirdly, the statement '*Recreational hunting is cruel to animals*' is clearly *loaded* and intended to elicit a positive response and manipulate responder opinion. I am very surprised that this fundamental and serious shortcoming in the 2003 survey questionnaire was not identified by either the Deakin University Human Research Ethics Committee or Miller's academic supervisor and corrected before the survey was undertaken.

In contrast to their assertion, recreational hunting of animals is not cruel as conducted under NSW State legislation otherwise it would not be permitted under the *Prevention of Cruelty to Animals Act (1979)*. Civilised human beings are not in favour of gratuitous cruelty to animals and it is especially important to note in Miller's survey that the Victorian Field and Game Association stakeholder group expressed one of the highest 'humanistic' (emotional attachment and love for animals) value scores for any of the 13 groups surveyed (Fig. 2, Miller 2003). It is regrettable that the apparent anomaly of concurrent high 'humanistic' and high 'dominionistic' value scores for the Victorian Field and Game Association stakeholder group was not explored or discussed by the author; that it wasn't indicates superficial intra- and inter-group analysis of the data and/or a lack of objectivity.

* Ascertainment bias describes the incorrect results of a study due to the way in which the data were collected

Claim: “. . . it is important to note the findings of another study based in Victoria (Miller 2003) which suggests there is a very low level of support for hunting activities within various wildlife management stakeholder groups and the general public.”

Response: In contrast to this unsubstantiated assertion recreational hunting is a popular and growing sport in Victoria, indeed Australia-wide, as indicated by the following facts:

- there are over 33,000 game hunting licence holders in Victoria (Department of Sustainability and Environment 2006)
- at January 2006 there were 15,000 licensed deer hunters in Victoria (Department of Sustainability and Environment 2006); this number had increased by 60% in the eight years to February 2004 when there were >11,100 licensed deer hunters (Parks Victoria 2004)
- Game Management Council of Victoria represents over 70,000 individuals (Department of Sustainability and Environment 2006)
- Sporting Shooters Association of Australia has >24,000 members in Victoria; over 106,000 members nationally (*personal communication* Roy Smith, Executive Director SSAA)
- Field and Game Australia Inc. (formerly, Victorian Field and Game Association) has 11,400 members in Victoria; over 13,500 members nationally (*personal communication* Rod Drew, Chief Executive Officer FGA) and
- Australian Deer Association has approx. 2,000 members in Victoria; over 3,500 members nationally (*personal communication* George MacKenzie, National President ADA).

Furthermore, there is high-level political support for recreational hunting as indicated by (a) memoranda of co-operation between Parks Victoria and two leading hunting organizations for the management of wild deer (Parks Victoria 2004) and pest control programs (Parks Victoria 2005) (b) the recent allocation by the Victorian Government of \$2.5m to support hunting (Minister for Agriculture (Vic.) 2006) (c) establishment of a statutory authority, the Game Council of NSW to manage hunting in New South Wales and declaration of over 90 state forests to date for public hunting of game and feral species (*personal communication* Brian Boyle, CEO Game Council of NSW) and (d) expansion of the Tasmanian Government Game Management Services Unit's property-based game management plans which have grown from less than 20 properties in 1996 covering 53,000 hectares to over 525 properties covering 1.6 million hectares at the end of 2005; these properties include state forest and adjoin National Parks (Department of Primary Industries, Water and Environment 2006). Similarly, the number of deer hunting licenses has grown each year for the past 6 consecutive years (*personal communication* Dr Graham Hall, Senior Game Management Services Officer, Dept. Primary Industries, Water and Environment).

Claim: “Our work does not support hunting in national parks as suggested by Larsson.”

Response: Nowhere in my submission did I either state or imply that Miller and Jones' 2005 work supported hunting in national parks. The citation was limited to a single, brief introductory section of my submission where I provided relevant background information as a prelude to presentation of facts, arguments and opinions on the two issues central to my submission i.e. the NSW Scientific Committee determination to list herbivory and environmental damage caused by deer as a key threatening process and restriction of access to national parks in New South Wales.

My citation from Miller and Jones 2005 was factually and contextually accurate and in no way misrepresented the authors' findings.

Claim: "...the role of hunting and other management practices in national parks must not be driven only by people's views of whether or not it is justified but by sound scientific knowledge."

Response: On this point I fully agree with Miller and Jones - management decisions should be based on sound scientific knowledge and evidence. It is surprising therefore that in the discussion on 'management / consumptive use of wildlife' (page 268, Miller and Jones 2005) the authors made no reference to the concept of 'sustainable utilisation of wildlife' which is supported by abundant scientific evidence and advocated by:

(a) internationally recognized and lauded Australian biologists including Prof. Michael Archer, Prof. Gordon Grigg and Dr Grahame Webb;

(b) professional societies including the Australasian Wildlife Management Society, the Australian Mammal Society and the Ecological Society of Australia; and

(c) international organizations, treaties and agreements including the Convention on Biological Diversity, the World Conservation Union (aka International Union for the Conservation of Nature and Natural Resources, IUCN) and the Convention on International Trade in Endangered Species of World Fauna and Flora (CITES).

Yours sincerely



Stephen Larsson

References

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Department of Sustainability and Environment 2006. *Victorian Hunting Guide 2006*.

Miller KK and Jones DN 2005. Wildlife management in Australasia: perceptions of objectives and priorities. *Wildlife Research 32: 265-272*.

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