



Submission on the Draft NSW National Parks Establishment Plan 2026

Public land access for regulated recreational deer hunting



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Executive summary

The Australian Deer Association (ADA) supports protecting biodiversity, cultural heritage, and well-managed public land. We also maintain that expanding the national park estate should not unnecessarily remove lawful recreational uses from land that is already held for the public.

The draft NSW National Parks Establishment Plan will guide decisions about land assessment, acquisition, transfer and reservation for the next 25 years. Those decisions may include the transfer of State Forests and other public land into the national park estate. For recreational deer hunters, a change in tenure can mean losing access to land where licensed hunting currently occurs. The draft Plan does not require NPWS to identify that loss, consult affected hunters or consider whether access can continue under an appropriate reserve category or regulated arrangement.

This is a material gap. The Plan recognises public enjoyment, visitor experience, regional economies, community wellbeing and social impacts, yet it does not identify hunting as a legitimate form of nature-based recreation. Nor does it measure the cumulative effect of transferring huntable public land into tenures where hunting is excluded.

The ADA asks the NSW Government to adopt a clear principle: where public land currently available for licensed recreational deer hunting is transferred into the national park estate, regulated access should continue unless a transparent, evidence-based assessment demonstrates that hunting is incompatible with the specific conservation, cultural or visitor-safety values of that land.

The final Plan should also create a pathway to assess regulated deer hunting in suitable existing national parks. Kosciuszko, South East Forest, Mount Imlay and Wadbilliga national parks should be considered for a licensed, seasonal and independently evaluated trial. Victoria provides a contemporary Australian example of national-park hunting operating through defined areas, seasons and conditions.

Recommendations

1. Require a recreational access impact assessment before State Forest, Crown land or other publicly accessible land is transferred into the national park estate.
2. Establish a presumption that an existing lawful recreational use will continue following transfer unless evidence specific to the land demonstrates that it is incompatible with the reserve's conservation, cultural or safety requirements.
3. Recognise licensed recreational hunting as a legitimate nature-based visitor experience within the Plan's visitor experience framework.
4. Require direct consultation with recognised hunting organisations when a proposed acquisition, transfer or reserve-category decision may affect hunting access.
5. Assess alternative conservation mechanisms and reserve categories that can protect environmental values while retaining compatible public access.
6. Assess Kosciuszko, South East Forest, Mount Imlay and Wadbilliga national parks for a regulated recreational deer-hunting trial.
7. Establish partnerships with hunting organisations for hunter education, harvest reporting, research, biological sampling, disease surveillance and field observations.
8. Report annually on public-land transfers, existing recreational uses, hunting access retained or lost, and progress towards new regulated hunting opportunities.

About the Australian Deer Association

The Australian Deer Association is a national not-for-profit association established in 1969. It has approximately 7,500 members nationally, including about 1,700 members across seven branches in New South Wales.

The ADA advocates for the sound management of wild deer and works to ensure recreational deer hunting is sustainable, respected and valued by the wider community and future generations. Its work includes hunter education, habitat and conservation initiatives, research, public policy advocacy and community engagement. ADA's NSW branches regularly deliver hunter education and provide a direct connection with people who use State Forests and other public land.

The ADA has contributed to public-land access outcomes for recreational hunters in New South Wales, Victoria and Tasmania. In 2026, ADA appeared before the NSW Legislative Council Select Committee inquiry into access restrictions to public lands and waterways. Our evidence to that inquiry supported an evidence-based, multiple-use approach to public land and proposed a carefully designed pathway for regulated recreational deer hunting in suitable national parks.

The ADA supports conservation and effective public-land management. We do not suggest that every activity is appropriate in every place. We do, however, reject the assumption that national-park status and regulated recreational hunting are inherently incompatible. Where restrictions are proposed, they should be supported by evidence relating to the particular land, rather than imposed automatically through a change in tenure.

The access gap in the draft Plan

The draft Plan states that land may enter the national park estate through the transfer of public land and that proposals will proceed through assessment, priority setting, consultation and approval. At the consultation stage, proposals are discussed with other government land-use agencies to identify competing interests and important land uses. This process does not expressly require engagement with the people who currently use that land or an assessment of the access that may be lost.

That omission matters because tenure determines access. NSW already operates a regulated public-land hunting system under which Restricted Game Hunting Licence holders may hunt on declared and open public land after obtaining written permission and complying with licence, booking, mapping and safety requirements. A transfer into the national park estate may remove that opportunity even where the physical characteristics of the land, the deer population and the form of recreation have not changed.

Across NSW there are proposals capable of transferring substantial areas of State Forest and other public land into the national park estate. ADA does not ask the Plan to decide each proposal in advance. It asks the Plan to ensure that access consequences are identified before a decision is made. Without that safeguard, separate tenure decisions can produce a substantial cumulative reduction in huntable public land while each proposal is assessed in isolation.

The Plan already contains the elements needed to correct this gap. It applies social and economic considerations as a decision-making filter, recognises public access under management effectiveness, and treats visitor experience as one of seven assessment themes. These provisions should expressly include existing lawful recreation and the consequences of restricting it.

Access should be assessed before tenure changes

Every proposal involving existing public land should include a recreational access impact assessment before it is prioritised for transfer or reservation. The assessment should identify current lawful activities, the number and type of users where data are available, associated access infrastructure, regional expenditure and the likely effect of the proposed reserve category.

For hunting, the assessment should identify whether the land is declared and open to licensed hunting, the species that may be hunted, the level of booking demand and whether the activity can continue through seasonal, spatial or other operating conditions. It should also identify the cumulative effect of related transfers within the region. This information should be published with the government's reasons for the final decision.

The final Plan should establish a presumption in favour of continuity. Existing lawful access should continue unless NPWS identifies a specific incompatibility and explains why less restrictive controls would not manage it. Such controls may include defined seasons, exclusion zones around visitor facilities, temporary closures, limits on hunting methods, mandatory bookings, reporting requirements and area-specific conditions.

This approach would not give hunting priority over conservation or Aboriginal cultural values. It would require decision-makers to consider compatible use rather than allowing a tenure label to decide the issue automatically.

Hunting is a legitimate visitor experience

The visitor experience theme is intended to support ecologically sustainable recreation, public enjoyment and the social and economic benefits that recreation can provide. Licensed recreational deer hunting fits within that framework.

Deer hunting involves extended physical activity, navigation, camping and close engagement with remote natural environments. It supports social connection and provides wild venison for personal consumption. Public land is particularly important because it provides an equitable opportunity for people who do not own land or have access to private property.

The draft Plan itself recognises the relationship between access to protected areas and physical and mental wellbeing. It also notes that visitors to remote areas are more likely to stay overnight and spend money on accommodation, fuel, food and local services. Deer hunters commonly travel for multi-day trips and spend directly in regional towns. These benefits should be considered alongside other visitor experiences, rather than excluded because the activity is hunting.

Recognising hunting as a visitor experience does not mean it must occur without controls. NSW already has licensing, accreditation, written-permission, booking and compliance systems that can be adapted to suitable national parks. The relevant question is how the activity can be regulated in a particular area, not whether it should be excluded from the Plan's conception of recreation.

Conservation does not always require the most restrictive tenure

The draft Plan properly recognises that biodiversity conservation occurs across a broader system of public and private protected areas. It refers to flora reserves, Indigenous Protected Areas, private conservation agreements, other publicly managed protected land and Other Effective area-based Conservation Measures.

This broader approach is important when land already provides conservation value and public recreation. Before transferring huntable State Forest or Crown land, NPWS should compare the environmental outcome and access consequences of available mechanisms. Depending on the land, those options may include retaining State Forest tenure with strengthened conservation controls, a flora reserve, an appropriate national park estate category, conservation zoning, an OECM or another cooperative arrangement.

Reserve-category selection should also be transparent. The draft Plan recognises that different protected-area categories permit different uses and levels of protection. Existing recreation, compatibility and the ability to manage risks should therefore inform the category selected. The government should not default to the category that removes the most uses when another category can secure the same conservation values.

A pathway for regulated hunting in national parks

Preserving existing access addresses future transfers, but it does not resolve the broader exclusion of recreational deer hunting from NSW national parks. The final Plan should commit NPWS to assessing regulated access in suitable parks as part of visitor experience, management effectiveness and partnership planning.

ADA recommends an initial assessment of Kosciuszko, South East Forest, Mount Imlay and Wadbilliga national parks. These parks contain remote landscapes and established wild deer populations, and the ADA identified them in its submission to the NSW public-land inquiry as suitable candidates for a first-stage trial. A detailed assessment would determine the appropriate boundaries, seasons, methods, and exclusions for each park.

Victoria demonstrates that national-park hunting can be controlled through clear rules. Deer stalking is permitted seasonally in specified areas of several Victorian national parks. In February 2026, access commenced across approximately 130,000 hectares of Snowy River and Errinundra national parks, with defined dates, areas and licence requirements. This does not mean NSW must copy Victoria's framework. It shows that national-park status does not, by itself, make regulated deer hunting impractical.

A NSW trial should build on existing State Forest systems and include:

- a current NSW Restricted Game Hunting Licence and written permission
- defined hunting areas and seasons, supported by digital maps
- exclusion zones around high-use visitor facilities and sensitive sites
- mandatory harvest and effort reporting
- baseline ecological, operational and visitor-use data
- monitoring of safety, compliance and visitor experience
- consultation with Traditional Owners and affected communities
- public reporting and independent evaluation after a defined period

The trial should be evaluated across environmental, safety, operational, recreational and community outcomes. Harvest numbers alone would not fully measure success.

Hunters as partners in stewardship and evidence

The draft Plan identifies the cost and complexity of managing a growing estate and emphasises partnerships with volunteers, community groups, researchers and other land managers. Recreational hunters are an existing community capability that should be included in that partnership model.

Hunters spend long periods in remote areas and develop practical knowledge of animal distribution, seasonal conditions, access tracks and infrastructure. With appropriate protocols, they can contribute field observations, trail-camera information, biological samples, disease surveillance and reports of weeds, damaged infrastructure or illegal activity. These activities should complement professional management and scientific programs, not replace them.

The ADA's seven NSW branch events and regular hunter-education activities provide a practical platform for communication, education and participation. A formal relationship between NPWS, the relevant game licensing authority and recognised hunting organisations could improve data quality, hunter conduct and the design of any future access program.

Changes requested to the final Plan

The ADA asks NPWS to amend the final Plan in four places.

First, the assessment framework in Part D should state that social and economic considerations include existing lawful recreational uses, access equity, regional expenditure and the cumulative effect of access restrictions.

Second, the management effectiveness theme should require NPWS to assess access for existing public users, not only access needed for NPWS management or general public entry. Its priority actions should include maintaining compatible access when public land is transferred.

Third, the visitor experience theme should expressly recognise licensed recreational hunting as a potential ecologically sustainable nature-based activity. The assessment should focus on compatibility and appropriate conditions rather than tenure-based exclusion.

Fourth, annual reporting under Part F should disclose the area of State Forest and other accessible public land transferred into the national park estate, the recreational uses affected, whether access was retained, and any new regulated opportunities created. The five-year evaluation should consider the net and cumulative effect of the Plan on public recreational access.

Conclusion

The National Parks Establishment Plan will shape the NSW public estate for a generation. It should protect nature and cultural heritage while also recognising that public land exists for the benefit of the whole community.

For recreational deer hunters, the risk is clear. If State Forests and other huntable public land are progressively transferred into the national park estate and hunting is automatically excluded, the practical result will be fewer places to hunt. The draft Plan currently provides no reliable mechanism to identify, prevent or account for that loss.

The ADA asks the NSW Government to preserve compatible access, assess the cumulative impact of tenure changes, recognise hunting within the visitor experience framework and establish a regulated pathway into suitable national parks. Conservation objectives and recreational deer hunting can coexist when decisions are based on evidence and supported by clear rules.

The Australian Deer Association is ready to work with NPWS, Traditional Owners, regional communities, researchers and other public-land users to design and evaluate that approach.

References

- Australian Deer Association 2025, Submission to the NSW Legislative Council Select Committee Inquiry into Access Restrictions to Public Lands and Waterways.
- Australian Deer Association 2026, Supplementary Submission to the NSW Legislative Council Select Committee Inquiry into Access Restrictions to Public Lands and Waterways.
- NSW Department of Climate Change, Energy, the Environment and Water 2026, Draft NSW National Parks Establishment Plan 2026.
- NSW Department of Primary Industries and Regional Development, NSW Public Land Hunting Program and Game Hunting Licence guidance, accessed October 2026.
- Parks Victoria 2026, Hunting in parks and Snowy River and Errinundra national parks deer hunting information, accessed October 2026.
- Victorian Game Management Authority 2026, Where to hunt, accessed October 2026.

A man wearing an orange cap, a dark jacket, and a large backpack is walking through a forest. He is holding a rifle. The forest has many tall, thin trees and some fallen logs on the ground.

AUSTRALIAN DEER ASSOCIATION MISSION

We advocate for the sound management of wild deer and ensure recreational hunting is sustainable, respected, and valued by the wider community and future generations.

We do this via our commitment to the sustainability of wild deer through habitat management, education, political advocacy, and community engagement.

