

NSW National Parks and Wildlife Service

**Review of aerial shooting operations and reported public
safety incident**

15 February 2022

Kosciuszko National Park

Report 31 October 2022

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Executive Summary

The NSW National Parks and Wildlife Service (NPWS) controls feral animals to protect natural and cultural values. Aerial shooting is tightly managed using NPWS specialist operators and aircraft to ensure safety, effectiveness, and efficiency and meet the highest standards of animal welfare. Ground shooting operations are undertaken by NPWS and in limited circumstance by trained contractors and volunteers.

In February and March 2022, NPWS commenced feral deer aerial shooting in parts of Kosciuszko National Park and on private property with landholder consent. On 15 February 2022, NPWS was conducting aerial shooting operations in the Moonbah area. During that operation, NPWS was advised two guests staying on private property had entered the park along Bakers Gully Trail. The guests were reported to be on the trail at the same time aerial shooting operations were occurring.

This review was commissioned by the Acting Coordinator General of the Environment and Heritage and Group supported by the Acting Deputy Secretary National Parks and Wildlife Service. The review has considered the circumstances of the operation on 15 February, including the application of policies and procedures relevant to aerial shooting.

The reviewer was not able to speak directly with the persons reported to be on the trail at the time of the operation. Although this review has been unable to speak with those persons, it assumes that the information that the persons were on the trail is correct and includes discussion of the possible reasons that they would have remained unseen by the crew undertaking the operation.

The review found there was no imminent risk to public safety posed by the operations on 15 February 2022. NPWS aircraft shot two deer near Bakers Gully Trail between 14:20 and 15:01. NPWS staff in the Jindabyne office were alerted to the reported presence of hikers on Bakers Gully Trail at 14:47 and the pilot was notified at 15:06. The aircraft had ceased operations in that vicinity at 15:02. The hikers were not seen by anyone on board the aircraft.

On the balance of probability, the hikers, if in the immediate vicinity, were likely to have been towards the rear of the aircraft and well outside the immediate firing zone where the shooters observations are concentrated when engaging targets in accordance with operational protocols.

The review found that the safety systems in place are sound and were observed. However, the review did identify deficiencies in the notification regime and operating system, noting opportunities for improvement across several areas. Thirteen (13) recommendations are made in this report to address aerial shooting deficiencies. Some of the findings and recommendations also have relevance to ground shooting operations. NPWS must continue to build a continuous improvement culture. These thirteen recommendations relate to notifications, training, doctrine, standards, and additional safety measures. Some recommendations should be actioned immediately (notification updates) while others will take longer to develop and implement.

The review found a strong safety commitment by staff involved in the operation and a desire to ensure the operation was conducted to a high standard. Those on board the aircraft operated to a very high standard and the program was well planned. Over the past two years, NPWS average over 1500 aerial shooting hours per year and over the past 12 years have conducted over 8,000 aerial shooting hours in total.

1. Key findings

1. Aerial shooting was carried out in an area of KNP adjacent to private property on 15 February 2022.
2. The helicopter was in the vicinity of the Bakers Gully Trail between 14.20 and 15.02. At 14.47, NPWS was contacted by a neighbour and requested a halt to shooting in the national park. The helicopter was advised to cease operations in the Bakers Gully Trail area at approximately 15.06. The aircraft had already moved to the west away from Bakers Gully Trail to continue operations further to the southwest.
3. The helicopter was NPWS-operated by an experienced pilot with many hours of aerial shooting operations. There were 3 other NPWS staff on board the helicopter: the shooter and navigator (both of whom had extensive training and experience in aerial shooting including in KNP) and the thermal imaging operator.
4. Weather was fine with clear sky and visibility was very good.
5. During the operation in the vicinity of Bakers Gully Trail from 14.20 to 15.02, 6 or 7 shots were fired. 3 or 4 shots occurred at 14.29 and 3 or 4 occurred at 15.01. All shots were fired in the national park. Two deer were killed.
6. Before the shots were fired, the required operational protocols were followed including:
 - The target was identified and confirmed.
 - There was no obvious or apparent risk to crew or aircraft safety.
 - There was no obvious or apparent risk to public safety.
 - There was no obvious or apparent risk to private property.
 - The shooter obtained clearance from the pilot (confirmation given) to begin shooting.
 - The shooter completed a spot risk assessment of the firing zone (point of aim) and back stop (direction of discharge).
 - The pilot had visibility of the target feral animal.
 - The navigator ensured the aircraft was operating on park.
7. All persons on board were actively searching on the ground before the shot was taken. The shots were taken approximately 60 metres above each target.
8. The vegetation where shots were fired was generally open alpine forest canopy with understorey and patches of open grassy areas and taller timber, meaning that any persons forward or within the firing zone on the ground should have been readily visible.
9. The NPWS staff in the helicopter did not see any persons on the ground while the shooting operation was conducted. Specifically, no persons were sighted in the vicinity of the 6 or 7 shots that were fired in the vicinity of Bakers Gully Trail.
10. In the last 12 years, NPWS has conducted over 8,000 hours of aerial shooting.
11. Prior to the shooting operation commencing:
 - a. The property owner was notified by email on 9 February 2022. The email address that the notification was sent to has been confirmed as being the correct address. However, interviews with the property owner after the incident revealed that he either did not receive or did not notice the emailed notification.
 - b. Other neighbours were notified by email between 8 & 9 February 2022.

- c. NSW Police were notified by email 11 February 2022.
 - d. Property owners consenting to deer control on private land received a telephone call as agreed prior to the operation commencing.
 - e. Signs were placed at four locations indicating the relevant area of KNP was closed from 14 February to 18 March 2022.
 - f. Notice of the closure was also placed on the NPWS website.
 - g. Four types of notification were used: public notification on the NPWS website, signage, email correspondence to immediate (known) neighbours and telephone calls to property owners consenting to deer control on their land.
 - h. A risk assessment was conducted taking into account aviation operations, the use of firearms (including unauthorised persons in the shooting zone) and animal welfare.
 - i. The aircraft had operated in the general area that morning with no hikers being sighted. The Feral Animal Aerial Shooting Team (FAAST) standard operating procedure states that the pilot in command may elect to undertake a reconnaissance flight prior to commencing aerial shooting operations. The crew decided not to undertake a reconnaissance flight in the afternoon because the area was believed to be closed and no persons were seen previously on the walking track. During the shooting operation, targets were confirmed, and each immediate firing area was risk assessed before each shot was fired.
12. Other than the property owners on whose land control was also undertaken, there was no telephone call to park neighbours, prior to shooting. Telephone notification was identified in the shoot plan as one (of two) notification mechanisms listed. The shoot plan did not clearly specify whether email notifications were considered an alternative to telephone notifications or an additional requirement. At the time there was no plan to phone all neighbours.
- a. The notifications indicated a date range of 14 February to 18 March 2022: a total of 25 days available for shooting operations, weather dependant. This could be improved by implementing longer lead times for park closures, so property owners have more notice, as well as reminders being issued two days prior to operations commencing.
 - b. Recognising there was no intent to notify by telephone, the reliance on a single notification method to notify by email reflects a deficiency which could be rectified by confirming with neighbours the best methods of communication and by implementing secondary notification arrangements for neighbours with guest accommodation bordering the park. Secondary notifications may or may not have made a material difference to risk mitigation for this specific event but is likely to reduce latent risk for similar activities.
 - c. It is also noted that some landholders were overlooked and did not receive notification of the shooting operation.
13. It is not known whether the guests staying on private property were aware of the national park closure or the shooting operation on 15 February 2022, but it is presumed they were not.
14. NPWS has rigorous standards and safety requirements listed in the FAAST manual, standard operating procedures, and the aviation safety policy. These are designed to ensure that operations are conducted in a safe manner and pose no risk to members of the public. These were met except for:
- Secondary notification via telephone call was not made as outlined in the shoot plan (noting that the shoot plan did not specify whether telephone

notifications were an alternative to written notification or an additional requirement).

- Signage was not placed at entrance to park from private property.
 - A second checklist was not completed (based on a misapprehension that the completed checklist achieved the same approval).
 - The incident was not logged in CAMMs due to the complaint being managed through the complaints policy pathway.
15. There is no requirement in the firearms legislation to notify neighbours or others of shooting operations. Advising immediate neighbours and park users is good practice and is one of several control measures in use by NPWS to ensure both visitors and neighbours are aware of the operation and park/precinct closures.
 16. A number of improvements to NPWS requirements for future operations have been identified, including providing longer lead times for park closures, enhanced notification protocols, ramp checks, development of training and mapping standards.
 17. The workers involved in the operation acted professionally with a high degree of experience and commitment to safety.
 18. None of the crew on board the aircraft saw the hikers during the operation. On the balance of probability, this may be a result of the hikers being located behind the aircraft, between the 4 o'clock and 8 o'clock positions. In this scenario, the hikers would have been located well outside the firing zone which is between the 12:30 and 3 o'clock positions. In accordance with operating procedures, the attention of the shooter was primarily focussed on the firing zone during operations. Air crew have good visibility to the sides and front of the aircraft, and it is unlikely that the hikers would have remained unobserved if located in these positions relative to the aircraft.

2. Recommendation Summary

Findings and Recommendations	Management Response and Commitments
<p>1. Provide adequate notice to park users and stakeholders based on risk assessments</p> <p>Establish a two-week notification period for aerial shooting on the NPWS website to provide park users a greater period of advance notice.</p> <p>Establish a two-week notification period for neighbours who have been identified to receive notification in accordance with the risk assessment and approved shooting plan.</p> <p>The risk assessment must identify the specific neighbours requiring notifications. The risk assessment should also identify the types of notification to be used per neighbour (email, telephone, letterbox drop, etc.), as determined by the level of risk attributable to the particular operation. Any exceptions to this process that are agreed between NPWS and the neighbour(s) must be documented.</p> <p>Reminder notices (where required under the risk assessment) should be actioned 48 hours prior to the operation commencing. Where practicable, the OIC or their delegate should ensure these notices have been received and acknowledged.</p>	<p>Response: Accept.</p> <p>Two-week notifications have been established via the NPWS website as part of the interim notification arrangements.</p> <p>NPWS acknowledges further work is required to ensure up to date information on park neighbours is readily available.</p>
<p>2. Neighbours with accommodation facilities to advise guests</p> <p>Before each aerial shooting operation neighbours with accommodation businesses adjoining the shoot area should be reminded to inform guests of intended closures and refer them to the NPWS website for updates.</p>	<p>Response: Accept.</p> <p>Noting NPWS cannot direct private businesses to inform guests. NPWS will work with neighbours to build stronger relationships that benefit all stakeholders.</p>
<p>3. Develop notification and park closure matrix</p>	<p>Response: Accept.</p> <p>NPWS will consult with experienced FFAST and ground OICs to develop the matrix.</p>

<p>Develop a notification and closure matrix or similar, in consultation with relevant staff, and clarify the requirements, standards, procedures and processes for neighbour notifications and park/precinct closures.</p> <p>The matrix (or similar) must take account of the risks generated by notification in some situations. This can inform a communication and closure plan in some situations where warranted.</p>	<p>NPWS acknowledges that notifications in some situations may increase the risk and will consider this when developing the matrix. The matrix will be informed by risk.</p>
<p>4. Clarify the process of approvals</p> <p>NPWS should clarify the approval process (including the required level of delegation) for an aviation operation that is led and managed by a program unit and not the operations branch. NPWS should also clarify the use of checklists. This must be reflected in the doctrine.</p>	<p>Response: Accept.</p> <p>NPWS will apply this recommendation to all aviation land management operations.</p> <p>NPWS will include the delegation and control requirements in the updated procedures.</p>
<p>5. Update aerial shooting doctrine</p> <p>Update aviation doctrine to include notification standards (type, method, frequency, signage messaging, etc.) and the use of the notification matrix.</p> <p>Align the requirements of the Parkair Operations Manual Part D with aerial shooting doctrine and vice versa where practical.</p>	<p>Response: Accept.</p> <p>NPWS will consult with users to ensure a practical safe system of work. The aviation reference group will review all aviation doctrine.</p> <p>The FAAST Manual is a shared resource with other FAAST agencies. Agreement may not be reached, in which case NPWS will ensure the FAAST SOP and or other FAAST doctrine are consistent.</p> <p>NPWS has no influence over the content of private aviation providers Operations Manuals, however will provide access to the NPWS requirements through the tendering assessment process for aviation providers or similar.</p>
<p>6. Develop mapping standards</p> <p>In consultation with experienced air observers and navigators, establish mapping standards for FAAST operations to reduce the risk of inadvertent boundary creep and ensure the navigator is working from a standard.</p>	<p>Response: Accept.</p> <p>NPWS will establish a reference group to ensure consultation and agreed standards are practical.</p> <p>Mapping standards (or the requirement for) will be included in the FAAST Manual, FAAST doctrine and OIC training program (once developed).</p>

	The FAAST Manual is a shared resource with other FAAST agencies. Agreement may not be reached, in which case NPWS will ensure the FAAST SOP and or other FAAST doctrine are consistent.
<p>7. Develop signage standards</p> <p>Develop a signage standard for notification and closure to ensure park users:</p> <ul style="list-style-type: none"> • Have been advised of the risks. • Have been issued an instruction. • Have been advised of penalties for non-compliance. <p>Symbology must meet AS or ISO standards and be consistent with the NPWS signage manual where it may apply.</p>	<p>Response: Accept.</p> <p>NPWS will consult with workers to develop a consistent sign template and standard messaging.</p> <p>NPWS may seek legal advice regarding the application of the <i>Civil Liability Act 2002</i>.</p>
<p>8. Develop ramp check culture</p> <p>Establish a culture of using ramp checks or similar (a routine safety procedure which confirms compliance with operational requirements and risk controls are present and functioning) immediately prior to commencing aerial shooting operations.</p> <p>This would allow final operational adjustments without immediate operational pressures. The FAAST checklist (amended) would support this culture piece, alongside leadership and regular reviews.</p>	<p>Response: Accept.</p> <p>NPWS will consult with workers to develop a framework in the first instance and then routinely monitor the process to ensure it becomes routine and valued.</p>
<p>9. Strengthen culture relating to notifications</p> <p>Alongside the development of clear notification standards, guides, and processes, NPWS must work towards a workplace culture of ensuring – through leadership and reviews – that notification requirements are understood, applied and functioning.</p>	<p>Response: Accept.</p> <p>In consultation with workers NPWS will ensure notification requirements are met and the process is routinely monitored and valued.</p> <p>Directors approving programs will ensure notification arrangements are in place.</p> <p>Updated procedures will include clear notification requirements.</p>

	NPWS will regularly monitor notification arrangements as part of the WHS assurance program.
<p>10. Train and support officers in charge</p> <p>To ensure a safe system of work, develop officer in charge (OIC) training to ensure those undertaking the role are suitably trained and supported.</p> <p>Evaluate the need for a currency period in this role.</p> <p>While the OIC in this instance operated to agency standards, the review has identified an absence of formal structured OIC training/mentoring as a latent risk. Although it is not found to have been a contributing factor in this instance, establishing such training and doctrine is recommended to mitigate future risks.</p>	<p>Response: Accept.</p> <p>In consultation with workers NPWS will:</p> <ul style="list-style-type: none"> • Identify the key criteria for the role. • Identify the key accountabilities of the role. • Identify the skills and knowledge required to perform the role. • Determine a suitable currency period. • Develop and deliver training for OICs.
<p>11. Establish training standards for navigators</p> <p>Define the training standards for FAAST navigator role and develop and deliver land management navigation training to ensure this critical role is governed by consistently high levels of skill and knowledge. The training must factor in the value local knowledge contributes to managing local risks.</p>	<p>Response: Accept.</p> <p>In consultation with workers NPWS will:</p> <ul style="list-style-type: none"> • Identify the key criteria for the role. • Identify the key accountabilities of the role. • Identify the skills and knowledge required to perform the role. • Determine a suitable currency period. • Develop and deliver training for FAAST navigators.
<p>12. Share knowledge between teams</p> <p>Develop a formal process for sharing information between teams on relevant neighbour contact details, interactions, complaints, or areas of concern. This should also include sharing aerial shooting lessons across areas.</p>	<p>Response: Accept.</p> <p>NPWS will review processes for sharing information to ensure information is available to key stakeholder.</p> <p>NPWS will consider leveraging from recommendation 13 – Parkmap in support of this recommendation.</p>
<p>13. Formalise record-keeping for neighbour contact details by implementing the Parkmap system (or similar)</p>	<p>Response: Accept.</p> <p>NPWS has commenced work to develop Parkmap.</p>

<p>To facilitate neighbour notifications and ensure accurate records are maintained, NPWS should implement Parkmap to capture property details, and progress a customer relationship manager program (under development). This will also provide a benefit to other business functions, including fire operations.</p>	<p>NPWS will review any legal or policy implications regarding the storing and sharing of potential personal information.</p>
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Recommendations relating to ground shooting

Findings and Recommendations	Management Response and Commitments
<p>14 Enhance ground shooting operations by implementing:</p> <ul style="list-style-type: none"> a. Recommendation 1 - provide adequate notice to park users and stakeholders based on risk. b. Recommendation 3 – Develop notification and closure matrix. c. Recommendation 7 – Develop signage standards. d. Recommendation 8 – Develop ramp check or similar. e. Recommendation 9 – Strengthen culture relating to notifications. f. Recommendation 10 – Train and support officers in charge. g. Recommendation 13 – Formalise record-keeping for neighbour contact details by implementing Parkmap. h. Progress the delivery of the Specialist Ground Shooting Team (SGST) training. 	<p>Response: Accept.</p> <ul style="list-style-type: none"> a. NPWS will update doctrine to reflect same approach as aerial shooting – noting in some situation’s notification may increase the risk. b. NPWS will apply similar approach to aerial shooting matrix in the context of ground shooting operations. c. In consultation with workers explore the option for a single sign template that can be applied to both aerial and ground shooting. d. NPWS will leverage from the aerial shooting ramp check and include in ground shooting procedures. e. NPWS will apply the aerial shooting approach. f. NPWS will review the OIC program for FFAST and leverage from that package. g. Parkmap (or similar) will apply to both aerial and ground shooting. <p>NPWS will prioritise resources to advance this training.</p>

Initial measures to support resumption of aerial shooting

Findings and Recommendations	Management Response and Commitments
<p>1. Ensure shooting area is closed</p> <p>Parks or precincts (the shooting area) must be closed to the public when aerial shooting is underway.</p>	<p>Response: Accept.</p> <p>Next steps: NPWS will include in revised procedures.</p>
<p>2. Avoid shooting weekends and school holidays</p> <p>Aerial shooting during weekends should be avoided subject to the following limited exception.</p> <p>Aerial shooting can be undertaken on weekends in areas with no or low visitation with adequate controls in place and listed in the JSA and shoot plan. Aerial shooting should not be undertaken during school holidays.</p>	<p>Response: Accept in principle.</p> <p>NPWS recognises shooting can occur during school holidays in some limited situations where the shooting area is not a regular visited park. A risk assessment will be undertaken before determining shooting operations.</p> <p>NPWS will take a risk informed approach and establish a process for approving operations in some situations during school holidays.</p> <p>Next steps:</p> <ul style="list-style-type: none"> • NPWS will include in revised procedures.
<p>3. Advise park users two weeks before shooting</p> <p>A two-week notification of aerial shooting arrangements must be provided via the NPWS website.</p> <p>a. NB: While the two-week notification period does not apply to emergency or reactive situations, in these instances, immediate notifications must be placed on the NPWS website and other appropriate local measures established.</p>	<p>Response: Accept.</p> <p>Next steps: NPWS will include in revised procedures.</p>

4. Limited exceptions to notification requirements

In very limited circumstances, it may be identified in the risk assessment that undertaking notifications will increase rather than decrease a public safety risk (for example, by inciting deliberate operational interference or incursion by protestors or media). Only in these limited circumstances may approval be granted to vary the notification measures outlined above by limiting or foregoing notifications. Such approval to not undertake notification must be made at the Director level or above, documented, and additional safety precautions must apply.

In the event that such approval is granted, a specific notification risk assessment must be completed and documented, and notifications moderated or not undertaken based on this risk assessment.

Additionally:

- a) Where notifications are limited or not undertaken, a greater focus must be placed on other safety control measures.
- b) The decision to vary the notification process from the abovementioned measures must be recorded in the shoot plan with instructions to the shooter/spotter that notifications have not been undertaken and the reason.
- c) The potential risk of incursion must be included in the operational JSA and JSB.
- d) A spotter must be allocated with the shooter and provided with clear instructions and surveillance equipment (e.g., thermal monocular, binoculars, infrared) monocular to assist with animal/human identification and public safety.
- e) The shoot plan, notification risk assessment, and the operations JSA must be approved through the current pathway.

Response: Accept.

Next steps:

NPWS will include in revised procedures.

<p>5. Specify closure periods</p> <p>Notifications must specify the period within which shooting will occur.</p>	<p>Response: Accept.</p> <p>Next steps: NPWS will include in revised procedures.</p>
<p>6. Manage the shooting window</p> <p>The window within which shooting is to occur in the shooting area should be no longer than twelve consecutive days (however, this does not limit the overall operational time; longer operations can proceed with breaks between consecutive shooting days).</p>	<p>Response: Accept.</p> <p>Next steps: NPWS will include in revised procedures.</p>
<p>7. Establish signs at entry & access points</p> <p>Signs must be established at all visitor entry/access points to the shooting area/precinct advising of the risk and a clear instruction of no entry during shooting periods. Signs must be established ahead of the operation to ensure visitors entering or intending to remain on park (multi-day walk/camping) are advised of the operation before departure. The level of notifications, including signage, must address the likelihood of visitors approaching the shooting area. A risk-based approach should be applied.</p>	<p>Response: Accept.</p> <p>Next steps: NPWS will include in revised procedures and include in the establishment of standard signs.</p>
<p>8. Conduct inspection before shooting</p> <p>Tracks, trails and visitor areas must be reconnoitred by the pilot, shooter and navigator prior to the commencement of shooting in the first instance.</p>	<p>Response: Accept.</p> <p>Next steps: NPWS will include in revised procedures.</p>
<p>9. Use the most appropriate communication method for the operation</p> <p>Email, phone or mail should be used as a direct communication method to neighbours identified for notifications adjoining the shooting area (where practicable and informed by a risk assessment). Where email is used for identified neighbour notification, a read/open response must be attached. A reminder</p>	<p>Response: Accept.</p> <p>Next steps: NPWS will include in revised procedures.</p>

<p>message is to be issued 48 hours prior to the operation commencing unless otherwise agreed and informed by the risk assessment. A record of notification must be kept in the appropriate CM9 file.</p>	
<p>10. Use additional measures in the case of the more intensive deer research project</p> <p>Neighbour notification must be written (email) in the first instance with a read/open auto response to ensure the notifications are received, and a follow up phone call made in cases where no acknowledgement is made. A reminder notification is to be issued 48 hours prior to the operation commencing. This process may be varied in cases where an alternative notification arrangement is agreed with the neighbour(s).</p> <p>These interim notification measures must remain in place until incorporated into all relevant NPWS policies and procedures.</p>	<p>Response: Accept.</p> <p>Next steps: NPWS will include in revised procedures.</p>

Initial measures to support resumption of ground shooting

Findings and Recommendations	Management Response and Commitments
<p>1. Risk assessment must inform closures</p>	<p>Response: Accept.</p> <p>Next steps: NPWS will include in revised procedures.</p>
<p>2. Parks or precincts (shooting areas) must be closed to the public</p> <p>Any exceptions to this stipulation (i.e., where there is no risk, or where public closure increases the risk of deliberate incursion) must be based on a risk assessment and approved at a Director level or above as part of the shoot plan process. Additional precautions will apply when notification does not occur, which must be specified as part of the approved risk assessment.</p>	<p>Response: Accept.</p> <p>Next steps: NPWS will include in revised procedures.</p>

<p>3. Risk assess notification arrangements</p> <p>Where concern exists for deliberate operational interference or incursions by protestors, a specific notification risk assessment must be completed to determine if notification of the shoot will generate the likelihood of increased presence of people such as protestors, media or others in the shooting area. Where this is the case:</p> <ol style="list-style-type: none"> a. The notifications must be moderated or not undertaken noting a greater reliance on other safety control measures. b. This must be recorded in the shoot plan with instructions to the shooter/spotter that notifications have not been undertaken and the reason. c. The potential risk of incursion must be included in the operational job safety analysis (JSA) and job safety brief (JSB). d. A spotter must be allocated with the shooter and provided with clear instructions and surveillance equipment (e.g., thermal monocular, binoculars, infrared) monocular to assist with animal/human identification and public safety. e. The shoot plan, notification risk assessment and the operations JSA must be approved by the branch director through the current pathway. 	<p>Response: Accept.</p> <p>Next steps: NPWS will include in revised procedures.</p>
<p>4. Specify closure periods</p> <p>Notifications must specify the time period within which shooting will occur.</p>	<p>Response: Accept.</p> <p>Next steps: NPWS will include in revised procedures.</p>
<p>5. Advise park users two weeks before shooting</p>	<p>Response: Accept.</p>

<p>A minimum of two weeks notification of ground shooting arrangements must be provided via the NPWS website unless otherwise determined not required through a risk assessment as discussed above.</p> <p>a. NB: The two-week period does not apply to emergency or reactive situations. In these instances, immediate notifications must be placed on the NPWS website and other local measures established.</p>	<p>Next steps: NPWS will include in revised procedures.</p>
<p>6. Establish signs and entry & access points</p> <p>Unless otherwise determined by the notification risk assessment, signs must be established at all visitor entry/access points within or immediately adjacent to the shooting area/precinct advising of the risk and a clear instruction of no entry during shooting periods and penalties apply. Where necessary, these should be established ahead of the operation to ensure visitors entering and remaining on park (multi-day walk/camping) are advised of the operation before departure. The level of notifications, including signage, must be proportionate to the level of likelihood of visitors approaching the shooting area. A risk-based approach should be applied, recognising that operations are routinely conducted at times when the park is generally not in use.</p>	<p>Response: Accept.</p> <p>Next steps: NPWS will include in revised procedures.</p>
<p>7. Ground shooting operations require two people</p> <p>Ground shooting operations (other than trap shooting and euthanasia) must involve a minimum of two personnel. Trap shooting and euthanasia is considered low risk and may be undertaken as a single person operation. Any other exceptions to the two personnel minimum may only be approved where the risk assessment indicates there is no risk to public safety. These exceptions must be approved by a director as part of the shoot plan process.</p>	<p>Response: Accept.</p> <p>Next steps: NPWS will include in revised procedures.</p>

Trap and euthanasia shooting

<p>Trap and euthanasia shooting can recommence applying existing procedures where the management and control are consistent with the Firearms Management Manual, and the prescriptions listed in the approved shoot plan. Existing procedures must include (but not limited to):</p> <ul style="list-style-type: none">• A current JSA (reviewed within the past 3 months).• An approved shoot plan and the appointment of an OIC.• Risk controls are known and applied including known back stop (i.e., the area where the bullet will not travel beyond).• There are no park users present.• If working alone adequate means of summoning assistance and a regular check-in regime must be in place.	<p>Response: Accept.</p> <p>Next steps: NPWS will include in revised procedures.</p>
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Supplementary pest control

<p>Supplementary Pest Control (SPC) operations can recommence where the management and control of the operations are consistent with the requirements of the Firearms Management Manual and the Supplementary Pest Control Manual. Items 4, 5 and 6 listed in the interim measures – ground shooting (above) should also apply.</p>	<p>Response: Accept.</p> <p>Next steps: NPWS will include in revised procedures.</p>
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