

Submission to Game Management Authority re Recreational Shooting of Native Duck & Quail 2023

By Regional Victorians Opposed to Duck Shooting Inc.



Introduction

Regional Victorians Opposed to Duck Shooting Inc (RVOTDS) is calling for the 2023 duck and quail shooting seasons to be completely closed based on:

1. **Alarming continued and long-term decline of game ducks.**
2. **Continued lack of breeding in game ducks.**
3. **Disturbing decline in Stubble Quail abundance.**
4. **Significant adverse impacts of hunting on protected species, and regional communities – not yet adequately investigated by GMA.**

The proposed season of 4 birds a day for a full season length is not a solution because:

- a reduced bag limit is impossible to monitor given the thousands of waterways open to shooters, and
- it requires significant costs to taxpayers for law enforcement, and
- it results in significant adverse impacts to protected species, nearby families, farmers and other recreational users and
- last season's reduced bag limit and full length have not provided bird populations the opportunity to recover

GMA's representation of the Kingsford/Klaassen AHM model as a basis for its recommendations is flawed. We discuss this on page 18 of this submission.

Closing the 2023 shooting season - which is GMA's duty to recommend - is the only sensible and appropriate way to allow the birds a chance to recover, and the regulator a chance to conduct overdue due diligence studies of social / economic impacts to community.

Background

The GMA Act states that it is a function of the GMA to:

- S6 (g): promote sustainability in game hunting, and
- S6 (i) to make recommendations to relevant Ministers in relation to - iii) declaring **public land open or closed to game hunting, open and closed seasons.**
- S6 (h): monitor, conduct research and analyse the environmental, social and economic impacts of game hunting. S8A requires the GMA to have regard to (b) the principle of triple bottom line assessment, which means an assessment of all the economic, social, and environmental costs and benefits, taking into account externalities and (e) the principle of stakeholder engagement and community participation, which means taking into account the

interests of stakeholders and members of the local community.

- S8 (1) of the Act requires GMA to perform its functions, (unless otherwise directed by the Minister in which case such directives must be published in GMA's Annual Report).

GMA appears to continually fail to perform its functions as stated under the Act. It is also failing to enhance public confidence in its regulatory performance.

GMA has not once closed a duck or quail shooting season despite presiding over the worst environmental conditions ever recorded and continued alarming declines in bird indices. Previous governments cancelled duck shooting seasons in 2003, 2007 and 2008 for less dire circumstances.

GMA has refused to close wetlands despite community pleas, petitions and council requests. This is despite there being so many thousands of public waterways open to shooters they can't possibly be monitored. Nowhere in the GMA Act, nor any other relevant legislation, does it state that GMA cannot close wetlands to shooting due to impacts on the community.

GMA refuse to close wetlands even when they are aware of threatened species present (refer comment from Hamilton Field Naturalists Club page 9)

Sadly, it appears the GMA is more concerned with finding ways of showing shooting is sustainable despite science showing it isn't, than performing its functions under the Act. We note key staff at GMA have been long-time holders of recreational bird shooting licences themselves, with strong links to hunt clubs whose key staff are in turn owners of gun stores.

RVOTDS, is a not for profit association which incorporated in 2018, with over 5800 supporters, and represents those who live and work around regional waterways adversely impacted by recreational bird shooting. Around one in four Victorians now live in regional areas. No risk assessments, no desk top studies regarding proximity of shooting areas to homes, no consultations with communities near shooting areas, have ever been conducted (other than at two wetlands in Mildura in 2019 which were subsequently closed to shooting for safety reasons).

In all of our submissions and communications to GMA, RVOTDS has provided significant evidence of adverse social / economic impacts of hunting to regional communities and protected / threatened species. We do so again in this submission.

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Continued Alarming Declines in Game Duck Abundance and Breeding Calls for Season Close

The most robust, long-term objective dataset available regarding the health of game duck populations, is the annual East Australian Aerial Waterbird Survey ([EAAWS](#)). It shows a continued alarming trend of decline in duck abundance – now just 25% of the long-term average.

- *“Most game species of ducks had abundances well below long-term averages, in some cases by order of magnitude; six out of eight species continued to show significant long-term declines. ..Some duck species declined in abundance compared to 2021 – Grey Teal, Pink-eared Duck and Hardhead” – p3. 2022 EAAWS Summary Report. (Note that the 2021 EAAWS showed game ducks had fallen 58% since the preceding year.)*

It also shows that despite two consecutive La Ninas, game ducks are not breeding.

- *“Five species comprised 96% of the total breeding recorded... straw-necked ibis, Australian pelican, Royal Spoonbill, Whiskered tern, and egrets.” – p3. 2022 EAAWS Summary Report.*

In the case of game ducks, obviously it can no longer be said that abundance or breeding is directly related to rainfall because ongoing declines the last few years have proven they aren't. Experts have cautioned this for some time now, for example:

“Bearing in mind that at the best of times, only 25 per cent of any avian species ever breed in a given year, it is predictable that the number of breeding events will decline this year. It can thus be expected that breeding success of the surviving birds will diminish, even if conditions should remain reasonably good”

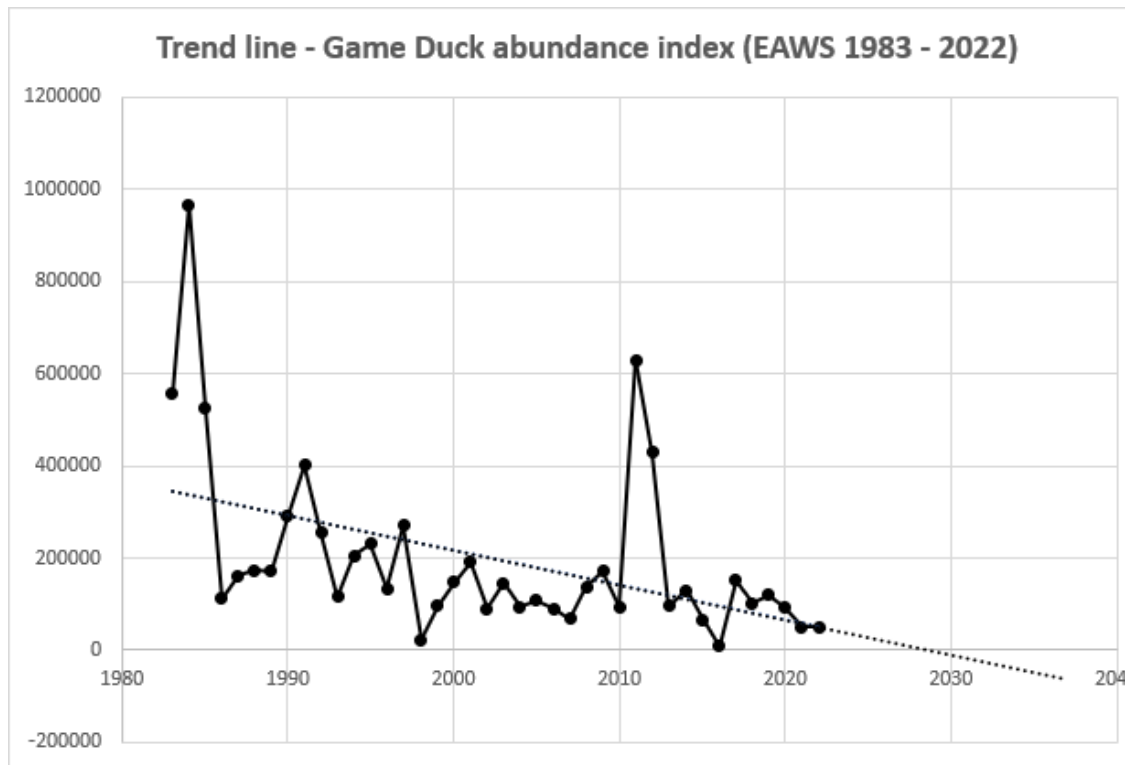
- Gisela Kaplan, Prof. of Animal Behaviour, PhD (Vet Sc.), The Weekly Times, Feb 2021.

Whether due to impacts of climate change not yet fully understood, reduction in insects, build-up of toxic lead which inhibits breeding¹, mismanagement of waterflows, failure to protect breeding pairs in previous year's shoots, it is clear that something is adversely impacting game duck populations. On current trajectories game ducks will be extinct on or before 2030 (refer graph).

Hunting remnant populations when there is little breeding activity, is neither sustainable nor responsible.

Duck populations must be given the opportunity to bounce back, and that means a break from recreational shooting.

¹ [Ornithology – Foundation, Analysis and Application p 812](#)



On current trajectories, game ducks will be extinct by 2030.

Comment from one of our key Alliance Partners, Humane Society International:

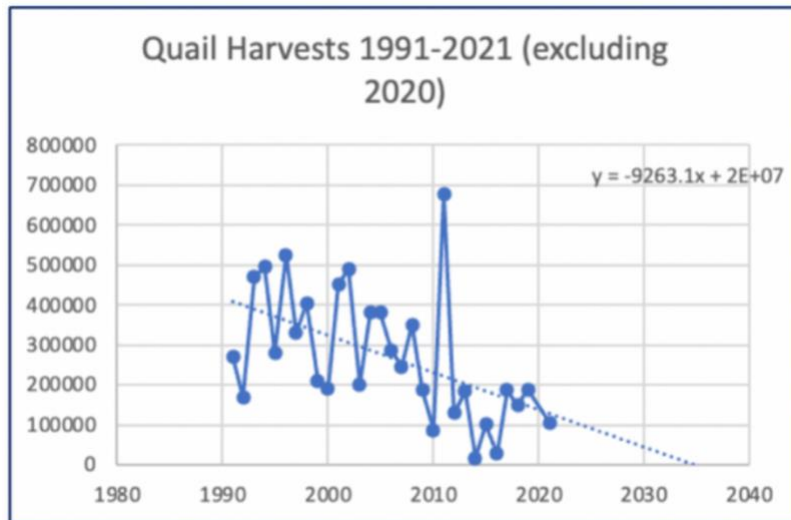
Humane Society International (HSI) Australia is strongly opposed to Victoria’s duck hunting season proceeding in 2023. In addition to welfare concerns for the hundreds of thousands of birds likely to be shot, a 2023 duck hunting season would place additional conservation pressure on struggling populations. The 2021 Eastern Australia Waterbird Survey (EAWS) showed that the total index of waterbird abundance decreased by 41% (the third lowest in 39 years). Game duck abundance index displayed an even worse decline with a 58% decrease resulting in the third lowest score in 39 years.

Above average rainfall in 2022 contributed to an increase in waterbird abundance from 2021 to 2022. Yet, long-term trends are more informative for predicting population status than year to year fluctuations and waterbird abundance remains well below the long-term average (the 11th lowest in 40 years). The 2022 game duck abundance index decreased by 2% from last year and became the third lowest recorded in 40 years (only 25% of the long-term average). Six out of the eight game duck species show long term declines in abundance.

All major EAWS indices for waterbirds including wetland area index, total abundance index, number of species breeding continue to show significant declines over time. HSI Australia urges the precautionary principle to be applied to its full extent, and asserts that the 2023 Victorian duck hunting season should be cancelled entirely.

- Dr Louise Boronyak, Humane Society International

Continued Alarming Declines in Native Stubble Quail Calls for Season Close



“Long-term harvest records can be used as a proxy to monitor abundance”

– GMA/ARI – Sept 2022

There is well founded concern for the abundance of Victorian native Stubble Quail. Government harvest records show a significant and alarming decline – refer graph above. GMA/ARI advised in September 2022, that *“long-term harvest records can be used as a proxy to monitor abundance”*.

A first-ever “count” of Stubble Quail Victoria took place in early 2022. Only 101 were counted. Concerningly, this tiny number was extrapolated up to an unbelievable 3 million, with a very high “uncertainty” coefficient of variation (0.29). Dr Ramsay - the report’s author - has previously stated that if this coefficient exceeds 0.15, the exercise becomes unreliable. Therefore, the estimate of 3 million quail is not able to be relied upon – which not a surprise to regional landowners who say there *“hardly any quail left”*.

Since this first- ever “count”, there has been unprecedented flooding in Victoria’s quail habitat areas. Flooding adversely impacts quail populations (Frith and Carpenter 1980).

It is highly concerning the regulator has not seen fit to even hold a consultation regarding quail hunting. As with our “game” ducks, Stubble Quail are native to our country and ought be protected. And as with game ducks, there is clear evidence of significant population decline and significant adverse impact to threatened species and regional communities which the regulator should be concerned with. Trespassing is commonplace and landowners are particularly concerned with the risk of spreading Foot and Mouth Disease through unauthorized access to property.

There are significant risks to threatened species such as the Plains Wanderer which resembles quail, due to quail shooters not being required to pass an accuracy test, or species identification test, and the adverse impacts to people and other wildlife of toxic lead ammunition still legally used in quail shooting. The very serious issue of lead ammunition and its far-reaching consequences is discussed on page 8.

Further critical factors which support a season close for 2023

Concerningly, the below factors are not given due consideration in GMA's Season Considerations:

1. Long-term effects of climate change which are predicted to worsen.
2. Birds' unique susceptibility to climate change.
3. Threat to migratory birds already experiencing significant decline.
4. Detrimental impact to bird populations of shooting monogamous bird species.
5. Adverse impacts of lead shot which is still used legally and illegally.
6. Lack of data regarding bird species present on wetlands prior to shooting.
7. Lack of data of birds shot during duck season.
8. Impact of shooting on protected & threatened species.
9. Shooters' critical knowledge gaps as proven by recent tests.
10. Lack of social/economic impact studies of bird shooting on the wider community, including lost tourism, inability to work from home, and health & safety implications including noise pollution.

The above points are detailed as follows:

1. The long-term trend of climate change and its impact on our waterbirds is rarely if ever mentioned by GMA. The Bureau of Meteorology has warned that our country is heating more rapidly than the global average. Worsening storms and floods, longer droughts, hotter, drier summers are some of the repercussions we are already seeing as a result of a 1°C rise in average temperatures. The bureau says we are headed for an unlivable 4°C rise in the next 80 years. The consequences for our wildlife will be catastrophic. Birds are especially vulnerable (see point 2).
2. No consideration has been given by GMA to the fact that **birds are twice as vulnerable to climate change as mammals**. ([Global Change Biology, Zoological Society of London – report by international scientists group based on 481 species in 987 populations around the world](#)). With climate change set to only worsen, it is obvious our already struggling bird populations require protection from recreational shooters.
3. Shooting disturbance at Victorian waterways adversely impacts migratory birds' ability to obtain critical feed and rest prior to their long journeys along the East Asian-Australasian Flyway.

Of the species who use the flyway, 50 are in "catastrophic" decline and Australia is under numerous International obligations to protect them (<https://www.environment.gov.au/biodiversity/migratory-species/migratory-birds>).

Hunters also force ducks to decrease their foraging behaviours, which can lead to compromised animal welfare including poor body condition. This has been shown to cause a **decrease in survival rates** for migratory birds. 6 Jan 2022

https://www.gma.vic.gov.au/assets/pdf_file/RS... PDF

[Duck hunting season 2022 - Game Management Authority](#)

4. No consideration has been given by GMA to the ripple effect through bird species most of which form life-long pairs - in fact, 90% conduct joint parenting. (As a comparison, only 5% of mammals, including humans, pair up and raise young together.) When one of a pair is shot, it is likely any offspring won't survive and the remaining partner may never

recover. The real impact to bird populations therefore of shooting, is far larger than just the “harvest” numbers reported. Refer [this article](#) by Professor Kaplan.

5. GMA has so far turned a blind eye to the serious issue of **lead ammunition still used** legally in quail shooting and illegally in duck shooting (as reported most years). Lead is extremely toxic to ecosystems, animals and people even in tiny traces (emedicine.medscape.com/article/1174752) It is an insidious poison causing extreme suffering to animals who ingest it, such as dabbling ducks, swans and secondary predators like protected eagles. Given the decline in breeding noted the last several years, GMA should seriously consider that lead also inhibits waterbirds’ breeding. Refer this [short webinar](#) by Dr. Ruth Cromie – Head of Ecosystem Health, Wildfowl and Wetlands Trust (WWT).

GMA would be aware of the [EPA analysis of a small number of Victorian wetlands in recent years and the toxic lead levels found in ducks](#) (well above safe food guidelines) at The Heart Morass, Macleod Morass, Richardson’s Lagoon and Serpentine Creek. The fact over 20% of a small number of shooting wetlands surveyed had “toxic ducks”, suggests the issue is frighteningly widespread across the thousands of shooting wetlands around the state.

According to a Department of Sustainability & Environment report (Flora and Fauna Guarantee Action Statement # 32), each ammunition cartridge holds 30-45g of lead. Multiply 30g by the average number of 175,000 shot quail each year in Victoria (GMA harvest estimates) and one gets a staggering 5 tonnes of lead potentially pumped into Victorian (including food-producing) environments each season - without even adding in the lead deposited by missed shots or used illegally in duck shooting.

There is evidence that lead “mobilises” in moisture and enters the food chain. Also, that it inhibits milk production in cows. (Guitart and Thomas 2005, Dickerson et al 2007).

A [2018 CSIRO study](#) was scathing of Australia’s failure to take seriously the risks to humans, animals and the environment from lead ammunition.

GMA’s own Simon Toop is well aware of the lead toxicity impacts of hunting, having been involved in the recent [study](#). In particular the finding:

“The quantity and characteristics of lead ammunition residues found suggest that predatory and scavenging wildlife and some groups of human consumers will be at risk of negative health impacts.”

GMA must cancel the duck and quail shooting seasons for this reason alone under the precautionary principle, or risk litigation for negligence.

Lead and lead toxicity – extract from [“lead Toxicity in Nz Brown Teal”](#) by Massey University NZ 2014

Lead is one of the most toxic metals known to man and can cause disease in wild animals, domestic animals and humans worldwide (Fisher et al., 2006).

The **most common cause of lead toxicity encountered in wildlife is ingestion of lead shot**, fishing sinkers and other sources of lead found in the environment (Hoffman et al., 2002; Davidson, 2006). The **most commonly affected wild birds are waterfowl and birds of prey** due to either direct ingestion of lead or indirect means such as via prey containing lead shot (Samour and Naldo, 2005; Davidson, 2006; Pain et al., 2009; Lambertucci et al., 2011). Other terrestrial birds and seabirds are also at risk due to the anthropogenic contamination of the environment with lead (Fisher et al., 2006; Pain et al., 2009).

6. **Insufficient data regarding birds including protected species present on wetlands prior to shooting.** In previous years (before GMA existed) over 500 wetlands were typically surveyed for the presence of bird species. However, neither GMA nor DELWP have been able to list, map or even estimate the number of, the thousands of waterways where unmonitored shooting is allowed, let alone monitor what may be present on them. Pre-shooting wetland checks are now far, far fewer than they used to be. The “priority bird count” is only concerned with 37. **It’s fair to say the regulator has no real idea of what birds are present at the vast majority of wetlands open to shooters.** It is the epitome of irresponsibility to continue to allow shooting in these circumstances and ludicrous to suggest “sustainability” can be ensured with such a gross lack of critical data. A reasonable question may be does it even care?

“The GMA has consistently allowed hunting on wetlands at Lake Linlithgow, Lake Bolac and Tower Hill when many hundreds of Blue-billed ducks and scores of Freckled Duck and Shovelers were present– and even a flock of 50 Brolga on Lake Bulrush in one year. They have done that despite the birds having no other sanctuary areas to go to. We regard that as utterly irresponsible and uncaring.

There are no safe sanctuaries for waterbirds in SW Victoria – since DELWP and the GMA are unwilling to put any wetlands permanently off-limits then there is absolutely no case for allowing any hunting on the region’s wetlands. Apart from conservation and animal welfare considerations, tourists have no hope of seeing ducks and other waterbirds at close quarters on lakes or swamps while the birds can be shot at there. Birds depart when people approach closer than about 200 m.”

*Secretary
Hamilton Field Naturalists Club*

7. **Insufficient and unreliable data of birds shot including threatened species.**

GMA’s own “Season Considerations” documents usually state *“To effectively manage game species, it is important to accurately quantify the number of animals harvested”*. Yet this is never done.

Despite GMA receiving millions more in taxpayer funds, there is a gross lack of monitoring. It is simply not possible to monitor the vast number of waterways where duck shooting is allowed. Even the army would be incapable of such a massive undertaking.

While earlier regulators commonly checked shooters bags at around 60 wetlands – still far too low a number to be able to accurately estimate the impact of shooting at thousands of waterways – GMA have struggled to check a tenth of that number. We are reliably informed that no hunters’ bags were checked in 2020 or 2021 due to COVID. If checks were not possible, neither should the shooting season have been.

Estimates of numbers of birds bagged by shooters are not only based on a survey of a small number of shooters then extrapolated out assuming the entire duck shooter base would be the same, but reliant on shooters’ memories and honesty. Estimates do not include birds shot and left behind and do not include the ripple effect through a species of losing one of a monogamous pair. They also of course do not capture the impact on protected species.

8. Given its requirements under the Act, it is of serious concern that GMA do not care more for impacts of hunting on protected and threatened species, which are evidenced each season. Just a few examples follow:

<https://www.theage.com.au> > National > Victoria

Protected birds shot - The Age

26 Mar 2013 — Several hundred birds, including rare and protected species, were shot at a

Lake Toolondo 2016, “*The Andrews government is headed for a showdown in the courts over the illegal shooting of dozens of rare and threatened birds during the opening of duck season. The shooting occurred despite the presence of Victoria police and authorized compliance officers*”. (The Age April 2016)

<https://au.news.yahoo.com> > terrible-tragedy-unfolding...

Threatened species gunned down during duck season

17 Mar 2022 — Under Victorian Government guidelines, shooters have a “bag limit” of four ducks a day and must make “all reasonable efforts to immediately ...

Box Flat 2013 “*The bodies of about 760 game ducks and 155 non-game birds were left on the water at the Box Flat flood plains near Boort. The shooting happened on opening weekend of duck season*”. (ABC March 2013)

<https://www.wildlifevictoria.org.au> > Publications PDF

Day two of duck shooting reveals the brutal truth

17 Mar 2022 — duck hunting season, threatened species and non-game water birds have already been illegally shot while other ducks have been left to die a ...

<https://www.weeklytimesnow.com.au> > news > news-story

Duck hunting: Hundreds of protected birds shot in Victoria

2 Nov 2017 — VICTORIAN hunters started illegally shooting before the 2017 duck hunting season opened, killing 260 protected species and dumping more than ...

Data Regarding Impact on Protected Species, Compiled by Previous Regulators

The shooting of protected / threatened species has been occurring for decades. RVOTDS obtained via Freedom of Information (FOI), documentation by previous regulators which shows a sample of the protected species killed in duck shooting seasons in Victoria (sample six years to 1993).

In addition, the documentation clearly stated more than once, that partial wetland closures do not protect threatened species such as Freckled or Blue-billed Ducks. (ARI Technical Report # 135)

Year	Collected by animal welfare	Collected by CNR	Total
1988	152	152	304
1989	273	392	665
1990	374	80	454
1991	435	119	554
1992	250	94	344
1993	813	159	972

← Numbers of protected species found dead at just some of the Victorian duck shooting wetlands 1988 – 1993. Note the introduction of the Waterfowl Identification Test (WIT) in 1991 made little difference.

Table 29 Number of specimens of non-game wildlife found dead around waters used for hunting during the 1993 duck open season. The data for birds collected by members of animal welfare organisations are counts made by CNR officers of birds delivered to CNR Heidelberg during the season.

Species	Collected animal welfare	Collected by CNR	Total
Freckled Duck <i>Stictonetta naevosa</i>	229	57	286
Eurasian Coot <i>Fulica atra</i>	242	35	277
Blue-billed Duck <i>Oxyura australis</i>	84	7	91
cormorant species	44	4	48
Black-tailed Native-hen <i>Gallinula ventralis</i>	0	43	43
Black Swan <i>Cygnus atratus</i>	29	14	43
Galah <i>Cacatua roseicapilla</i>	21	11	32
small grebes	19	5	24
Musk Duck <i>Biziura lobata</i>	19	1	20
Great Crested Grebe <i>Podiceps cristatus</i>	14	1	15
Australian Magpie Lark <i>Grallina cyanoleuca</i>	0	13	13
corella species	7	5	12
ibis species	8	3	11
White-faced Heron <i>Ardea novaehollandiae</i>	3	6	9
Red-necked Avocet <i>Recurvirostra novaehollandiae</i>	6	1	7
Yellow-billed Spoonbill <i>Platalea flavipes</i>	0	6	6
migratory waders	1	4	5
Australian Magpie <i>Gymnorhina tibicen</i>	0	4	4
Silver Gull <i>Larus novaehollandiae</i>	4	0	4
tern species	0	3	3
Barn Owl <i>Tyto alba</i>	0	3	3
raven species	3	0	3
Darter <i>Anhinga melanogaster</i>	2	1	3
Dusky Moorhen <i>Gallinula tenebrosa</i>	2	0	2
raptor species	1	1	2
kingfisher species	0	1	1
Noisy Miner <i>Manorina melanocephala</i>	0	1	1
Australian Pelican <i>Pelecanus conspicillatus</i>	0	1	1
Fairy Martin <i>Cecropis ariel</i>	0	1	1
Little Friarbird <i>Philemon citreogularis</i>	0	1	1
Brush-tailed Possum	0	1	1
Total	813	159	972

972 protected species found dead at several Victorian wetlands in duck shooting season 1993, including Australia's rarest native duck – the Freckled Duck, thought to be one of the world's rarest, galahs, magpies and ibis.

***Note these tables show only a fraction of the true toll on our protected species which is likely much larger because the vast majority of waterways where duck shooting is allowed are not monitored.**

Failure of GMA to Maintain Data Regarding Impact on Protected Species

According to the CEO of GMA, the numbers of protected species illegally shot each season these days are not quantified. This horrific fact is confirmed by Arthur Rylah Institute (ARI) who says regarding the risks or impacts of direct hunting mortality on non-target species:

“That is a separate question that can only be properly addressed by gathering robust data on the rates of non-target species being killed or injured by hunters. Such data does not exist and would be extremely difficult to gather”.

– ARI 2019 “Waterbird Susceptibility to Disturbance from Hunting”

In their 2017 Hunters Bag Survey Report, ARI state that less than ten wetlands (out of thousands) were checked for wounded / un-retrieved birds. Just at these few, 18 birds were found including nine dead swans and two dead pelicans. According to their 2018 report, only one wetland was checked for wounded/ un-retrieved birds. In both the 2017 and 2018 reports, ARI’s number one recommendation was that more wetlands needed to be checked and more data collated to be able to determine the impacts of hunting on waterbird populations. Yet the number of any such checks in following years is understood to be zero.

By continuing to allow recreational shooting of ducks and quail at so many waterways they can’t possibly be monitored, GMA is at odds with the GMA Act, and with any attempts to enhance public confidence in its performance.



Birds left behind after duck shooting: including penguin, musk duck and pied cormorant (protected species).

Picture Kim Wormald

6. Serious shooters’ knowledge gaps – a further risk to protected species.

According to GMA’s recent knowledge surveys:

- Only 42% of hunters of all animal types got a general knowledge question on personal safety correct.
- Only 37% of duck shooters were able to correctly answer a two-part question on wounding.
- Only 20% of duck and quail shooters were able to correctly answer a three-part question on identifying game species.
- Only 13% of duck shooters correctly answered the question on dispatch of downed birds.

Further, there are no species ID tests for quail shooters, even though quail resemble the critically endangered Plains Wanderer which are the subject of a significant taxpayer funded recovery project.

7. Lack of cost-benefit analysis or social/economic impact studies on the wider community.

GMA suggest that duck shooting is of economic benefit to rural communities. This statement is highly misleading and is purely based on a small survey of shooters, answers unverified, which does not take into account the cost to Victorians of regulation and compliance, nor adverse impacts to the wider community. It is not based on a cost benefit analysis - which has never been done - and ignores:

1. the analysis by independent economists such as The Australia Institute, Dr Kirsty Jones (Monash University) and VEAC Red River Gum Investigation reports which state duck shooting is detrimental to rural economies and
2. public polls and scores of surveys and petition feedback from rural communities. Adverse impacts of bird hunting to community include:
 - Inability to work from home.
 - Inability for shift workers to sleep.
 - Noise pollution (EPA issued a safety warning about the use of gas guns which are not as loud and not used as frequently or for as long a duration as shotguns are during duck shooting.)
 - Loss of amenity.
 - Lost tourism.
 - Distress to children, stock and pets.
 - Pellets on roofs which collect water supplies.
 - Hunters trespass.
 - Safety risks of firearms in public places

GMA should close the season until they can appropriately investigate these serious issues. We discuss a few in more detail below.

Safety Risks

Consider the impacts of “[coked up shooters](#)” and [campers’ terrifying nights](#), of over 30 instances of [hunting and firearms offences](#) in a single weekend.

Accidental shootings do occur Just a couple of examples: <https://newsroomodisha.com/pregnant-woman-shot-at-by-blue-duck-hunters-in-up/> & <https://www.rnz.co.nz/news/national/441631/two-women-shot-and-injured-by-duck-hunters-in-central-otag>

“The shooting season in its current format is completely at odds with the growth of adventure tourism. How can we possibly manage a safe tourism activity, when a shooter can come and set up on any waterway. The shooters need to be regulated to only be able to shoot in certain areas and keep very separate from other tour ventures. My question to the regulators, is “Who has the right of way” (same as any waterway) Do our paddlers need to leave the water when a shooter is present or does the shooter need to leave. You currently have no guidelines and you have no safety signage to provide a rule for right of way.

There is a liability that must be owned by the regulators when on water activities come close to shooters, firing out into the waters.

I draw your attention to places like the Cohuna Town Lagoon (where we regularly operate), this is within 2km of a town centre, and is used extensively by boaters, paddlers, fishers and even swimmers. How can you possibly add shooters into this mix for several weeks of the year. You have NO warning signs, you have no guidance and you clearly have not stipulated a right of way.”

Shannon O’Brien

Managing Director

Sydney Harbour Kayaks

Murray River Adventures

Member of the NSW Transport Minister’s Maritime Advisory Council Member

GMA is aware that two wetlands in Mildura were closed to duck shooters for safety reasons in 2019. Why is duck shooting allowed to occur close to residents elsewhere around the state? GMA knows that no risk assessments have occurred, not even desk-top studies to investigate proximity of shooting areas to family homes. Yet GMA has made no recommendations to close shooting wetlands despite community and council requests.

This submission again includes the voices of regional groups – those on the ground, whose lives and livelihoods are impacted by duck shooting for a quarter of each year.

Refer [2018 online survey](#) and [2021 petition comments](#).

A few examples:

“Living on the Murray River trying to ski or fish during this time is dangerous”

“The effect of having shooters dressed in camouflage hiding in bushes is disturbing and that’s putting it mildly”

“..shooting too close to a retirement village. Dangerous and distressing”

“Shooting native waterbirds only a few meters from my house turns my home into a warzone”

“My husband is a war veteran. After a few days I hear him saying “I just want some peace”

Adverse Impacts to Tourism

Data just released by Tourism Research Australia (TRA) shows outdoor nature activities continue to be far more popular, and generate higher economic returns, than outdoor sports.

In the year to September 2022, the number of domestic tourism visits for nature-based activities in Australia grew 13% and attracted spending of \$52 billion, almost double the \$29.5 billion expenditure from domestic tourism relating to outdoor sports.

Domestic tourists who birdwatched totaled 795,000, (almost double the number who visited the Great Barrier Reef), who bestowed \$522 million on our economy. Bushwalking/rainforest walks, and visits to national/state parks, were also popular with domestic tourists who spent \$22 billion, and \$20 billion respectively.

But domestic tourism is only part of the equation. Pre-covid, three times as many international tourists (6.6 million), relished an outdoor nature activity as opposed to outdoor sport. Almost one in ten birdwatched and spent a staggering \$2.6 billion, or 8% of our total international tourism revenue.

Conversely, the latest survey summary report by DJPR showed duck shooting expenditure (according to shooters) dropped 46% from 2013 to 2019*. Quail shooting expenditure fell 58%. The recent economic analysis by the Parliamentary Budget Office (PBO) put duck shooters at a potential net spend of just \$4m - 10 m.

In 2021, NSW and QLD (where recreational bird shooting is banned), received the lion's share of the lucrative domestic overnight nature tourism market with \$7.3 billion and \$8.8 billion respectively. Victoria received just \$4.4 billion.

It is ludicrous that less than half of one percent of the population who hunt ducks, have access to so many thousands of our public waterways that authorities can't estimate their number. Hunting has been shown repeatedly, to deter tourism²

"As a regional Victorian resident and tourism business owner I find it difficult to understand the continual bias towards hunters. Less than 2% of the state's population receive more support than lucrative and less damaging bird watchers and nature tourism visitors. My business was severely impacted in the 2022 duck hunting season; I closed my business after enduring weeks of unsafe shooting nearby. The More to Explore app includes all wetlands in the state even when they are privately owned and not open to hunting. After trying for weeks to have this issue resolved, wetlands are still included on this app designed to make it easier for hunters. I am wondering how I will manage if another duck hunting season is allowed. Why isn't the decline of water birds enough reason in itself to stop this outdated destructive pastime for a few? It has no benefit to regional Victoria, is destroying our unique wildlife and distressing regional communities."

Owner – Venus Bay Eco-Retreat

² The Australia Institute "Out for a Duck", Dr Kirsty Jones (Monash University), VEAC Red River Gum Investigation, UComms Poll 2021.

"It is well known in the travel industry that any form of animal hunting is anathema to most travellers and generally countries and regional centres have discovered in recent times that there is more financial benefit from 'wildlife viewing' than killing!"

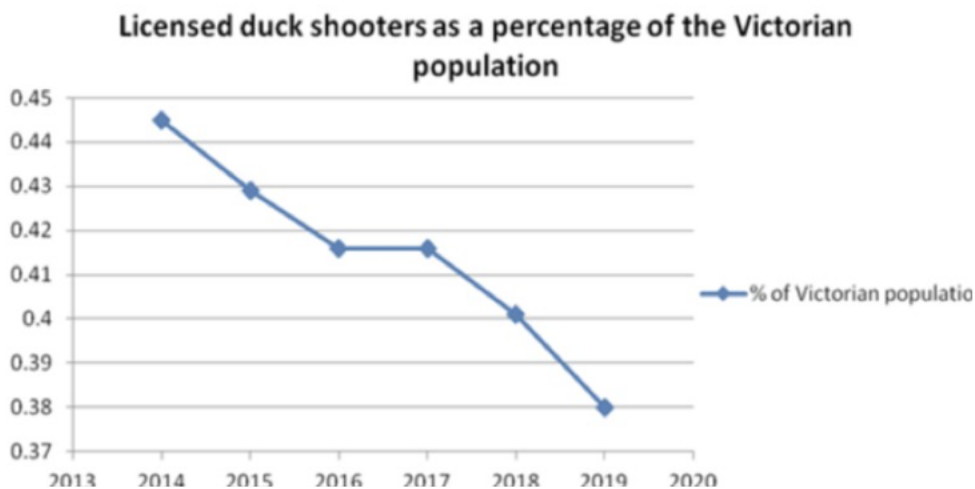
There is a worldwide travel industry movement to train staff in educating clients on 'Not riding or harming wildlife' at all and many of these so-called tourist attractions have been or are in the process of shutting down.

Regional centres would see more tourism financial benefit by changing their mindset to promoting wildlife especially as bird watching is becoming more and more popular."



Duck Shooting is Unpopular

GMA also incorrectly states duck shooting is “popular”, quoting numbers of game licences issued which is misleading because the population of Victoria has boomed. The accurate measurement is the percentage of the population interested in duck or quail shooting which is tiny (less than half of 1%) and declining. Only half of that tiny number are active bird shooters.



Duck shooting, a declining pastime in which only about 8000 participants partake is not “popular”, particularly when continual polls show the majority of Victorians – city and country – are opposed (UComms 2021)

Birdwatching, one of the fastest growing pastimes in the world in which over 1.4 million domestic and international participants took part in Australia in the first-year data was collected (2019), is “popular”.

Sadly, the former hampers the latter.

GMA must cease incorrectly asserting that duck shooting is popular or of economic benefit to regional communities, and instead perform due diligence re the significant adverse impacts to the 99.8% of Victorians who do not shoot ducks.

[In 2020, fifteen organisations](#) including leading conservation, environment, regional and animal welfare groups provided statements / submissions to GMA calling for a season close. They were ignored.

Over 44 major business, union, environment and wildlife organisations signed on to our “Alliance” advertisement which ran in several major newspapers. They were ignored also.

[In 2022, the number of First Nations Clans, business, union, environment and wildlife groups willing to publicly support our stance has grown further – now at 91.](#) Their members and supporters number in the hundreds of thousands. It’s time GMA properly considered community.

“Many wetlands across Northern Victoria receive environmental water for the promotion of aquatic ecosystems; waterfowl are an important link in the restoration of these wetlands.

The Victorian public and local communities have a significant investment, both financially and in the management of these wetlands for ecological outcomes.

Where water in these wetlands is wholly attributable to environmental water deliveries, hunting should be banned to promote multiple ecosystem outcomes.

I question the use of environmental water to facilitate hunting which in turn impacts wetland ecosystems.

Surely, we Victorians are smarter than this!”

President of Goulburn Valley Environment Group

A Word On The Interim AHM – Kingsford Klaassen Report.

As part of a 2018 election promise to hunt clubs (at least one of which is chaired by the owner of a gun store), the Victorian government now relies on a fairly recent "Adaptive Harvest Model" (AHM) to inform hunting arrangements.

It appears hunt clubs wanted this new model (funded by taxpayers, 99% of whom do not hunt), because the long-term science ([EAAWS](#)) continues to show our native duck populations are declining in abundance and breeding even in the case of significant rainfall. We are confident that if the long-term science was showing healthy duck numbers, there would have been no request from shooters for the investment into AHM.

The AHM appears to attempt to justify continued hunting in the face of damning science.

It claims "large numbers of waterfowl travel large distances". However in [2019, DPI NSW found](#) many ducks did not travel far at all.

It also mentions the old assumption that duck populations are linked to rainfall when the last few years have proven this is not the case.

We note that GMA – whose key staff have been long-time holders of recreational bird shooting licenses themselves - represents the Kingsford/Klaassen ([KK model](#)) as the basis for its recommendations, rather inaccurately. The KK model specifically states it did *not* take into account social/economic impacts, is *not* able to make predictions at species level, and *should* be used only as a tool - not to set hunting arrangements without due diligence ("*Final Caveats*" p. 15).

To the report author's credit, it admits shortcomings including that:

- the model is "only a tool which should be used with due diligence"
- the model is "too inaccurate" to be able to predict per species
- "the number of ducks in Victoria and SE Australia is unknown"
- the model did not account for social / economic or ecological impacts
- the land-based duck count is only performed at 37 "priority" waterways (- far too small a number to be in any way an accurate state-wide estimate when there are tens of thousands of shooting waterways around Victoria.)

GMA last year recommended a record 90 day shoot. Nowhere in the AHM - nor any other documentation - can we see any recommendation for a 90 day shoot. In fact, the average season for the last 30 years has been 70 days, so where did GMA get the additional 20 days (call it three weeks) from? Did the regulator consider the costs to Victorians of law enforcement for such a length of time? Or the adverse impacts to threatened species or nearby residents?

Importantly, we also note that a 60% reduction in bag limit with a full season length, (the 2022 season allowed four birds per shooter per day) resulted in only an 18% reduction in overall harvest and therefore did not provide an opportunity for populations to recover.

Only a drastically reduced season – or better, a cancelled one – is a solution to the alarming declines in bird populations and the significant adverse impacts of shooting to community.

Conclusion

If GMA are at all concerned with sustainability, or the impacts of hunting on anyone other than a minority group of bird shooters, if it wants to encourage public confidence in its regulatory performance, it needs to recommend a 2023 season close for duck and quail shooting.

Should GMA be unwilling to take the appropriate step above, it must provide a full, clear and transparent report as to why, addressing in detail all of the issues raised in this submission. In addition, it must ensure that the only waterways open to shooters in the interim, are those few where recent (within two weeks) bird counts have taken place by an objective experienced group such as BirdLife Australia, where monitoring will occur at all times by authorities (as happens with outdoor shooting ranges normally), where residents, other recreational users, animals or stock are not within five klms, and where there is clear signage erected regarding where shooters can and cannot shoot. Any waterways where community have requested exclusion zones should obviously be closed to shooting. Finally, the shooting should be reduced to a maximum timeframe of three weeks so as not to burden taxpayers with the costs of law enforcement or lost tourism opportunities.

Regional Victorians Opposed to Duck Shooting Inc.

Attachments:

[2018 survey of regional residents](#) &

[2021 Petition Comments re Closing a Public Waterway to Shooting in Central Victoria](#)

Letters

Hunting makes no sense this season

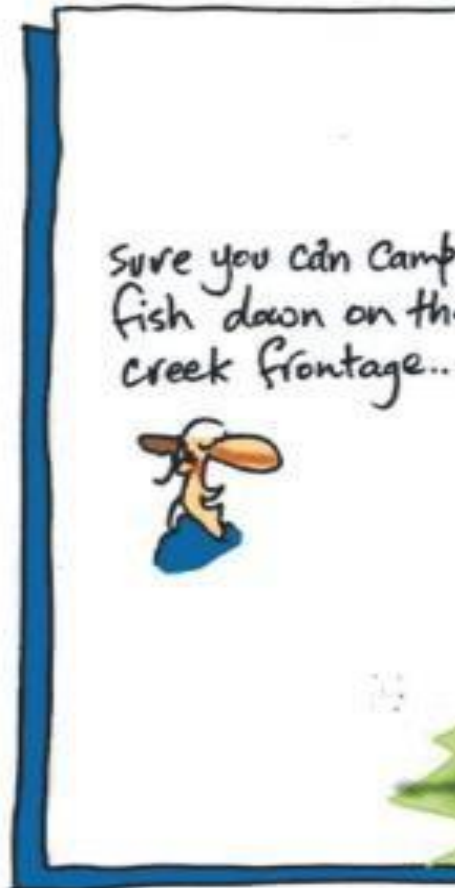
WE cannot easily reverse a warming climate, or avoid the likelihood of more frequent and longer droughts and fire seasons. What we can change with the stroke of a pen, are the additional man-made threats such as recreational bird shooting, or we will have to take responsibility for aiding and hastening a catastrophic downturn of waterbird species.

It is often falsely believed that birds will simply "bounce back" — there are biological limits to this bouncing back because of the limited opportunities and options that birds have themselves.

Moreover, many successful breeding pairs will have become victims of past fire and drought catastrophes themselves and inexperienced birds may not have had time to acquire partners. Bearing in mind, that at the best of times only 25 per cent of any avian species ever breeds in a given year, it is predictable that the number of breeding events will decline this year.

It can thus be expected that breeding success of the surviving birds will diminish, even if conditions should remain reasonably good.

It is scandalous to allow any shooting season this year and it is particularly puzzling that the shooting season of waterfowl allows, tolerates or turns a



blind eye to the shooting even of vulnerable and endangered species.

Native birds have a role to play in maintaining a healthy Australian ecosystem, healthy waterways and in control of pests. I would like to see shooters shoot clay pigeons as accomplished sportsmen and women, not as self-appointed executioners of native wildlife.

Gisela Kaplan,
Prof. of Animal
Behaviour, PhD (Vet.Sc)

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References

- <https://todaysveterinarynurse.com/articles/management-strategies-lead-toxicity-a-threat-to-wildlife/>
- https://www.smh.com.au/environment/conservation/bird-numbers-unlikely-to-fully-recover-despite-drought-breaking-rains-and-floods-20211206-p59fc0.html?fbclid=IwAR0UwcsiMoItbCH_F0ijZpk3KWpMP6J3MjU_cRj5QIAwBhMJ92DIWuAmu9A
- CSIRO on toxic lead ammunition
- Dr Ruth Cromie Lead poisoning in waterfowl.
- https://www.environment.vic.gov.au/data/assets/pdf_file/0022/32942/Use_of_lead_shot_in_cartridges_for_the_hunting_of_waterfowl.pdf
- <https://www.theguardian.com/environment/2018/oct/30/humanity-wiped-out-animals-since-1970-major-report-finds>
- <https://australiascience.tv/exploitation-of-wildlife-is-the-fast-track-to-more-infectious-diseases/>
- <https://www.haaretz.com/science-and-health/MAGAZINE-sheer-speed-of-global-warming-is-decimating-birds-say-scientists-1.6302093>
- <https://www.birdlife.org/worldwide/news/how-will-climate-change-affect-bird-migration-our-scientists-explain>
- <https://www.australiangeographic.com.au/topics/wildlife/2018/11/going-extinct-by-neglect-the-state-of-australias-threatened-birds/>
- Tourism Research Australia National Visitor Survey year ending December 2019
- <https://theconversation.com/what-australian-birds-can-teach-us-about-choosing-a-partner-and-making-it-last-125734>
- Global Change Biology, Zoological Society of London
- <https://www.australiangeographic.com.au/topics/science-environment/2019/07/birdwatchers-identify-big-decline-in-seabirds-off-south-eastern-australia/>
- Submission to Regulatory Impact Statement for Victoria's Draft Wildlife Regulations 2012 -The Australia Institute
- The Arthur Rylah Institute Hunter Bag Surveys 2017, 2018
- Ecosystems Across Australia are Collapsing under Climate Change – The Conversation 5/7/18
- The Australia Institute; “Out for a Duck”.
- VEAC Red River Gum Investigation