

# Geelong Duck Rescue

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## **Considerations for the proposed 2022 recreational duck shooting season: Geelong Duck Rescue submission**

### **Geelong Duck Rescue**

Our organisation was established in 2010 in response to the concerns of local residents and visitors for the welfare of native waterbirds and other wildlife in the Geelong and Western Victoria Region. Whilst Geelong Duck Rescue (GDR) has been in existence only 11 years, individual members have been involved in wildlife rescue and rehabilitation for much longer.

GDR has sought to work with other community groups, authorities, residents, local council, local government, veterinarians and other wildlife rescue groups to protect and assist wounded wildlife and to monitor for illegal activities including (but not limited to) shooting before and after legal times, shooting protected and non-game species, shooting above daily bag limits, and cruelty offences.

Members of GDR have a comprehensive knowledge of wetlands and waterways in the Geelong region gained through many hours spent both during, and outside of, the 'season'. The continuity of time spent in one area also allows for a unique comparative perspective on water levels, bird numbers, climatic conditions and shooter behaviour over the years.

We thank you for this opportunity to provide our submission for consideration during discussion of the proposed 2022 recreational duck shooting season.

## Introduction

Geelong Duck Rescue does not support the recreational duck shooting season in Victoria (or elsewhere), due to the inherent cruelty of the activity. However, this submission will not be addressing this point; it will instead focus on considerations for the decision-making process regarding calling a duck season in Victoria for 2022.

We will address the declining bird numbers in our state and across Eastern Australia, the reliability of the methodology used for data collection to support decision-making, considerations around biodiversity and supporting 'one health' policies, and the ability of authorities to adequately monitor duck shooting across Victoria. The impacts of restricting access to wetlands and waterways across the state on regional communities, who are desperate to welcome back tourism dollars after almost two years of on and off restrictions to visitors, will also be discussed.

We believe it is irresponsible to hold a 2022 recreational duck shooting season in Victoria. It risks the long term viability of duck populations, increases the risks to humans and animals from the loss of biodiversity and the increased risk of zoonotic diseases and has negative impacts on already struggling regional communities. We therefore recommend that the Game Management Authority (GMA) supports a moratorium on the 2022 duck season.

## Bird Numbers

The 'Eastern Australian Waterbird Survey', (also known as the 'Kingsford Survey') conducted annually since 1983 by a team associated with the UNSW Sydney, "*provides one the few quantitative, large scale biodiversity datasets that can monitor changes in the distribution and abundance of 50 waterbird species, including threatened species, and the health of rivers and wetlands.*"<sup>1</sup>

The survey is conducted to high standards of scientific research using a consistent methodology, at the same time of year, across the same areas, and implementing a consistent counting and reporting process. Data accuracy is therefore of a high calibre and provides a strong basis for comparison and the evaluation of trends.

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<sup>1</sup> <https://www.ecosystem.unsw.edu.au/research-projects/rivers-and-wetlands/waterbirds/eastern-australian-waterbird-survey>

## Duck numbers are in Decline

**“Four major indices for waterbirds** (total abundance, breeding index, number of species breeding and wetland area index, Fig. 1) **continue to show significant declines since 1983**. If 1983 & 1984 peak years are omitted then 3 of the 4 major indices still show significant decline (OLS regression at  $p=0.05$ ; variables 4th root or log transformed where appropriate; Table 1). **Long term trends are more informative for predicting population status than year to year fluctuations.**”

(Aerial Survey of Waterbirds in Eastern Australia - October 2021 Annual Summary Report J.L. Porter, R.T. Kingsford<sup>2</sup>, R. Francis and K. Brandis)

Duck numbers are in decline in Victoria. This is indisputable. The scientific waterbird surveys support this fact, the observations of birdwatchers and wildlife rescuers support this fact, and even duck shooters support this fact.

Therefore to actively seek to kill **more** of a population in decline, for no purpose other than the recreational pursuit of a few, makes no sense and is not at all in line with community expectations. Duck shooting no longer has a social licence with a Roy Morgan poll indicating that 75 percent of people want this activity banned.

The Arthur Rylah report indicated that numbers of pink-eared ducks and blue-winged shoveler ducks were too low to allow any ‘robust’ analysis.<sup>2</sup> If a duck shooting season is held in 2022, the only responsible course of action in regard to these specific species is to remove them from the game bird list for 2022.

GMA states on their website that:

“The GMA has an important role in managing natural resources across Victoria addressing:

- the sustainable harvest of game species”<sup>3</sup>

Additionally, recreational ‘hunting’ is governed by a number of pieces of legislation, including the ‘Wildlife Act 1975’, which states as its purpose:

### *1A Purposes*

*The purposes of this Act are—*

- (a) to establish procedures in order to promote—*  
*(i) the protection and conservation of wildlife; and*

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<sup>2</sup> [https://www.ari.vic.gov.au/\\_\\_data/assets/pdf\\_file/0029/519239/ARI-Technical-Report-325-Abundance-estimates-of-game-ducks-in-Victoria-2020-aerial-survey.pdf](https://www.ari.vic.gov.au/__data/assets/pdf_file/0029/519239/ARI-Technical-Report-325-Abundance-estimates-of-game-ducks-in-Victoria-2020-aerial-survey.pdf)

<sup>3</sup> <https://www.gma.vic.gov.au/about-us>

(ii) the prevention of taxa of wildlife from becoming extinct; and  
(iii) the sustainable use of and access to wildlife; and  
(b) to prohibit and regulate the conduct of persons engaged in activities concerning or related to wildlife.<sup>4</sup>

Hunting a species in decline cannot be construed as 'sustainable' use and GMA cannot justify supporting an activity which directly contravenes their stated purpose.

### **Accuracy of data**

***“Total waterbird abundance in 2021 (n=95,306) decreased from 2020 and remains well below average: the 3rd lowest in 39 years.”***

*(Aerial Survey of Waterbirds in Eastern Australia - October 2021 Annual Summary Report J.L. Porter, R.T. Kingsford2 , R. Francis and K. Brandis)*

The Kingsford survey has been conducted since 1983 and is accepted and highly regarded within the scientific community, as stated previously.

Coincidentally, after a number of years where results show declining bird numbers which have affected the length, and permitted bag limit, of the recreational duck shooting season in Victoria, the GMA have decided to conduct their own aerial bird surveys.

These surveys were conducted as follows:

Aerial and ground counts were conducted on **randomly selected** farm dams, sewage ponds, wetlands, creeks, rivers and irrigation channels throughout Victoria in October.

And results showed:

The total state-wide abundance of game ducks was higher than in 2020, mainly due to the inclusion of estimates for rivers/streams and sewage treatment ponds, which were not included in the pilot survey in 2020.

So in conclusion:

**NO scientific methodology was detailed**  
**NO scientific methodology was followed**  
**NO consistency of data collection across years was followed**

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<sup>4</sup> <https://content.legislation.vic.gov.au/sites/default/files/2021-12/75-8699aa126%20authorised.pdf>

Naturally, bird numbers will appear higher if a larger number of areas are surveyed. This data and the conclusions drawn from it are spurious and clearly being used with the intention to deceive.

Using the GMA counts to inform decision making makes a mockery of any pretence that there is any scientific rigour in the decision making process when determining whether to hold a recreational duck shooting season. It is the commonly held belief by our membership, and parts of the broader community, that the only reason the GMA has opted to conduct its own aerial surveys is that it was continually embarrassed by the Kingsford report and sought 'alternative facts' to better support its agenda of continuing a duck shooting season against the scientific advice.

## **Climate change and Environmental considerations**

The Anthropocene climate change has brought multiple new and varied threats that disproportionately impact water systems. Freshwater systems such as lakes, reservoirs and rivers are estimated to cover only 2.3% of the Earth's surface while simultaneously hosting at least 9.5% of the Earth's described animal species within their ecosystems<sup>5</sup> (Reid et al. 2019). The continued decline in biodiversity of freshwater ecosystems could have drastic effects that could see a decrease in waterfowl numbers.

Climatic conditions strongly influence the movement and breeding biology of many Australian waterfowl at local, regional and continental scales<sup>6</sup> (Briggs 1992). The increased rainfall as a result of changes in the climate has the potential to influence the prevalence of Avian Influenza Virus (AIV) in waterfowl populations within South-Eastern Australia, putting both humans and domestic animals at risk<sup>7</sup> (Ferenczi et al. 2016). The consequences of allowing and encouraging humans to interact with native waterfowl for the sake of hunting has the possible implication of creating the next zoonotic disease.

Protecting Victoria's waterbirds, wildlife, threatened species and ecological communities is important, to ensure that we have a state rich in biodiversity, clean air, healthy waterways, and therefore healthy humans. In short, we must protect the health and wellbeing of the planet. Massive declines in biodiversity and increased human contact

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<sup>5</sup> <https://onlinelibrary.wiley.com/doi/10.1111/brv.12480>

<sup>6</sup> [https://absa.asn.au/wp-content/uploads/2021/08/Cor-Vol-16-Pg15-22\\_MovementBreeding\\_AridZoneDucks.pdf](https://absa.asn.au/wp-content/uploads/2021/08/Cor-Vol-16-Pg15-22_MovementBreeding_AridZoneDucks.pdf)

<sup>7</sup> <https://veterinaryresearch.biomedcentral.com/articles/10.1186/s13567-016-0308-2>

with wildlife also increases the risk of creating conditions for pandemics<sup>8,9</sup>, as seen on a global scale in 2020 and ongoing. We are currently living with the global economic and health consequences of interfering with wildlife. Three major crises are threatening life on Earth - biodiversity emergency, climate emergency and emerging diseases<sup>10</sup>. Killing thousands of native waterbirds can have far-reaching impacts beyond simply threatening population numbers. We support a 'One Health'<sup>11</sup> approach to decision-making as endorsed by the World Health Organisation (WHO).

## Enforcement

Each year the GMA has the responsibility for enforcing the Wildlife Act and the regulations as relates to the duck shooting season. Each year since the inception of the GMA, the agency has been critically understaffed rendering them unable to competently attend to, and police, the vast majority of shooting locations. With fewer than 20 of their own enforcement officers and several hundred, if not thousands of sites, there is no pretence that the officers are going to attend anything more than a fraction of sites where shooting may occur.

Additionally, the majority of wetlands available to recreational duck shooting are not observable from the waterline due to the vegetation concealing the duck shooters and any potential offences they may be enacting. The vast majority of authorised officers witnessed by our members do not even attend the wetlands dressed to go into the water to seek out offences, and many do not even exit their cars. The authorised officers we have generally encountered have relied almost solely on information and evidence of wrong-doing from volunteer members of the public.

In instances where the GMA have recruited additional support from other enforcement agencies including Victoria Police, Fisheries and Parks Victoria, these officers have been demonstrably under-trained and are inexperienced in the full range of potential offences for which they need to observe.

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<sup>8</sup> Grandcolas P. & Justine J-L. (2020) COVID-19 or the pandemic of mistreated biodiversity. The Conversation 30/4/2020 <https://theconversation.com/covid-19-or-the-pandemic-of-mistreated-biodiversity-136447>

<sup>9</sup> Armstrong F. Capon A. & McFarlane R. (2020) Coronavirus is a wake-up call: Our war with the environment is leading to pandemics. The Conversation 31/3/2020 <https://theconversation.com/coronavirus-is-a-wake-up-call-our-warwith-the-environment-is-leading-to-pandemics-135023>

<sup>10</sup> IPBES (2020) Workshop Report on Biodiversity and Pandemics of the Intergovernmental Platform on Biodiversity and Ecosystem Services. Daszak, P., das Neves, C., Amuasi, J., Hayman, D., Kuiken, T., Roche, B., Zambrana-Torrel, C., Buss, P., Dandarova, H., Feferholtz, Y., Foldvari, G., Igbino, E., Junglen, S., Liu, Q., Suzan, G., Uhart, M., Wannous, C., Woolaston, K., Mosig Reidl, P., O'Brien, K., Pascual, U., Stoett, P., Li, H., Ngo, H. T., IPBES secretariat, Bonn, Germany, DOI:10.5281/zenodo.4147317

<sup>11</sup> <https://www.who.int/news-room/questions-and-answers/item/one-health>

If GMA is to have any legitimacy as an enforcement agency, it must commit to staffing and training their enforcement team adequately so as to properly police a significant number of wetlands throughout the entire season.

In past years, enforcement officers have disclosed to Geelong Duck Rescue that their maximum shift time ends earlier than the close of legal shooting time. This has left no enforcement officers available at all during peak times of shooting, such as the closing hours of the first day of the season, when a large number of offences occur. This has been allowed to happen as all the staff were rostered on for the opening morning of the season. We understand that recently GMA have sought to correct that problem somewhat but the fact remains that a legal shooting period in a day is often longer than that of the officers' shift so that staggering work shifts becomes a necessary technique which cannot be achieved with such an understaffed team.

The critical point in the staffing issues of the GMA is that all duck shooters are keenly aware of the limits of the GMA's abilities and they can, and frequently do, take full advantage of the knowledge that they are very unlikely to ever be caught in the commission of an offence.

It has also come to the attention of Geelong Duck Rescue that the GMA do not even have a reliable database of all the legitimate shooting locations across Victoria, let alone a full knowledge of possible private lands to which their responsibility also extends. The public would expect that the enforcement authority responsible for regulating an activity in which firearms are principally involved should at least have a thorough knowledge of where that activity could occur. The maps made available online are acknowledged to be incomplete and rife with errors. Duck shooters cannot comply with the law when the information provided to them by the GMA is faulty in the first place.

Furthermore, the vast number of alleged offences by duck shooters witnessed by community volunteers and duly reported to GMA with evidence provided, receive no attention or follow-up from officers. It was noted in the Pegasus report of 2017<sup>12</sup> that enforcement was significantly biased in this way, but it appears that no real change has occurred within the agency in the intervening time. In order for the GMA to attempt to regain public trust they must be seen to be actively pursuing cases fairly and a much greater degree of effort in community collaboration and trust-building is required.

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<sup>12</sup> [https://8c4b987c-4d72-4044-ac79-99bcaca78791.filesusr.com/ugd/b097cb\\_97d51dc5a28a4c9e992c231ee0e9cf1e.pdf](https://8c4b987c-4d72-4044-ac79-99bcaca78791.filesusr.com/ugd/b097cb_97d51dc5a28a4c9e992c231ee0e9cf1e.pdf)

## **GMA Bias**

The Game Management Authority has not existed without controversy. The 2017 Pegasus Report<sup>13</sup> discusses the implications of GMA promoting hunting (Pegasus Economics 2017). GMA has been criticised for being 'neither impartial nor independent' (Pegasus Economics 2017). The current *Game Hunting in Victoria: A manual for responsible and sustainable hunting*<sup>14</sup> from 2018 discusses the economical and social benefits of hunting, showing a bias towards the promotion of the hunting (GMA 2018).

As an organisation paid to monitor compliance of the season, it is in the best interests of the GMA to continue to hold duck shooting seasons because they are financially dependent on it. This is a clear conflict of interest. This bias should prevent the GMA from having the ability to make recommendations based on their own research.

## **Safety of duck shooting**

Urban areas are expanding and encroaching upon game reserves and other nature areas where duck shooting occurs, making the safety of residents and visitors of paramount concern to everyone. This is especially worrying in areas such as Geelong where housing estates such as Armstrong Creek, (which will house tens of thousands of residents when complete), are closer than 2 kilometres from where recreational duck shooting takes place. Considering that there is no boundary for where shooting 'finishes' until you reach the Barwon Heads Rd, shooting may occur within the range of vehicles, as well as local community facilities.

Recreational firearm use does not belong in proximity to residential living, shopping centres, schools and sporting grounds, all of which exist in abundance surrounding the Lake Connewarre wetlands. The vast majority of residents are unaware that shooting is permitted so close to their homes or community hubs and can become alarmed when hearing gunshots. Continuing to allow firearms to be discharged so close to highly populated and actively used areas is a recipe for disaster that could easily be avoided.

If these wetlands are going to be used for duck shooting, then adequate signage aimed at warning the community that duck shooting is taking place in the area, and of the potential dangers, should be placed at every entrance to the wetlands which is in close proximity to populated areas.

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<sup>13</sup> [https://www.gma.vic.gov.au/\\_\\_data/assets/pdf\\_file/0011/481682/Assessment-of-the-GMAs-compliance-and.pdf](https://www.gma.vic.gov.au/__data/assets/pdf_file/0011/481682/Assessment-of-the-GMAs-compliance-and.pdf)

<sup>14</sup> [https://www.gma.vic.gov.au/\\_\\_data/assets/pdf\\_file/0010/499096/Game-Hunting-in-Victoria-2nd-edition.pdf](https://www.gma.vic.gov.au/__data/assets/pdf_file/0010/499096/Game-Hunting-in-Victoria-2nd-edition.pdf)



## Regional Victorian Tourism

The past two years have had unprecedented impacts on all businesses, communities and individuals. Populations who have been significantly affected by the COVID-19 imposed lockdowns and restricted travel are our regional towns and communities, many of whom rely heavily on tourism for jobs and financial stability.

*“In the six months ending June 2020, total visitors to and within Victoria was 30.7 million, a decline of 19.9 million visitors (-39%) compared to the same period in 2019. Total visitor spend in Victoria over this period experienced a deeper decline (-43%, or down \$7.0 billion) to \$9.3 billion.”<sup>15</sup>*

Eco-tourism was on the rise pre-pandemic, across the general population, who were looking to lessen their environmental footprint whilst travelling<sup>16</sup>. This value should be considered when making decisions about who can access our natural environment and when.

Many of our outdoor pursuits revolve around the tranquillity of water. Swimming and kayaking require healthy, clean bodies of water. Birdwatching and wildlife watching depend upon the presence of established wetlands where birds reside or migrate to, or where wildlife visits regularly.

The economic value of birdwatching is often overlooked, however studies have shown this to be significant contributor to tourism<sup>17</sup>. The construction of raised boardwalks, bird hides and viewpoints in wetland and natural areas, can provide substantial recreation opportunities for many people, not just birdwatchers, and building all-access pathways creates equal opportunity for all to enjoy the region.

Unfortunately, a duck shooting season creates an environment where the locals, visitors and tourists are prevented from taking part in these nature activities and pursuits. Access to wetlands and waterways is restricted for 3 months of the year (if a ‘full’ duck season is held) for those who don’t hold the relevant duck shooting and firearms licences.

**According to the GMA’s ‘Considerations for the 2022 duck season’ document, this means that the ‘24,330 Game Licence holders endorsed to hunt duck in 2021’ have free**

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<sup>15</sup> [https://business.vic.gov.au/\\_\\_data/assets/pdf\\_file/0003/1984620/Coronavirus-COVID-19-impact-on-Victorias-Visitor-Economy-released-April-2021.pdf](https://business.vic.gov.au/__data/assets/pdf_file/0003/1984620/Coronavirus-COVID-19-impact-on-Victorias-Visitor-Economy-released-April-2021.pdf)

<sup>16</sup> <https://www.nielsen.com/au/en/insights/article/2019/eco-tourism-is-not-just-for-greenies/>

<sup>17</sup> <https://www.responsibletravel.org/wp-content/uploads/sites/213/2021/03/market-analysis-bird-based-tourism.pdf>

reign for their recreational activities, which leaves the remaining 99.634% of Victoria's population<sup>18</sup> are unable to freely access public nature areas.

The challenges of COVID-19 lockdowns and high case numbers, has also changed how we use our recreation time. People feel more comfortable, 'safer' and are more likely to meet outside rather than in a confined space. Additionally after many months of people being restricted to a 5km radius from home, or being confined to their homes in isolation, there is a strong desire for many to return to nature and to spend time away from crowded, urban environments. Supporting the physical and mental health of individuals and the struggling communities in which they will spend time and tourism dollars is vitally important and we also have an obligation to support regional Victoria to the best of our ability. This means opening regional to all Victorians and interstate visitors and not restricting our public areas to only those who wish to shoot ducks.

## Recommendations

1. The 2022 recreational duck shooting season should not proceed. The GMA should advise the Minister that the season in 2022 is unsustainable and inappropriate in the eyes of the community.
2. Consider the protocol used for data collection of bird numbers, breeding abundance and wetland conditions and only accept data collected by methods which would stand up to the scrutiny of the scientific community for acceptability/accuracy.
3. Consider that GMA aerial surveys should be used only as supplementary data to the Kingsford report, until such a time as a legitimate and respectable methodology is developed and publicly disclosed and the surveys have built up a history of data to show trends comparable to the Kingsford report..
4. Consider the long term implications on biodiversity from removing significant numbers of native waterbirds from local populations.
5. The Victorian Government must commission a follow up review of the GMA by Pegasus Economics, to determine if the issues identified in 2017 have been adequately addressed and corrected .
6. GMA should provide a detailed response to how they have addressed each issue and how they are planning to tackle any unresolved problems and over what time frame. Responses must be reviewed by an independent panel of experts and a report submitted to the Minister.

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<sup>18</sup> <https://www.abs.gov.au/statistics/people/population/national-state-and-territory-population/latest-release>

7. Develop an independent panel of experts and community stakeholders to provide advice and recommendations to the government regarding duck shooting as GMA have a clear conflict of interest..
8. Employ and adequately train and resource a far larger enforcement team capable of monitoring the wetlands across the state to meet community expectations.
9. Pledge to support tourism and local economies across regional Victoria by supporting and promoting tourism opportunities which include and benefit all of the population.

**In the event that the season does go ahead against our recommendations, the following applies:**

10. The season should be significantly reduced in length.
11. The Blue-Winged Shoveler should remain a prohibited species as it has for the past few years, due to its ongoing low numbers.
12. The Pink-Eared Duck should be added to the prohibited species list due to low numbers.
13. Each game species must be given a significantly reduced bag limit (especially the 5 game birds recognised by GMA as experiencing ‘long-term declines’) as well as having a reduced daily bag limit overall. Each of the game species is acknowledged to be under pressure.
14. Any designated hunting area that is now within 2km of a major community facility, such as shopping centres, schools, sports grounds and community halls, should be closed to shooting for the duration of the season. This particularly applies in the case of Connewarre wetlands in Geelong.
15. Install adequate warning signs at all locations where shooting is allowed.

## **Conclusion**

Duck shooting in Victoria has lost its social licence with surveys indicating that over 75 percent of people want this activity banned. Wildlife is in serious decline especially in Australia and we should be protecting our native species, not killing them for “sport”. Nature tourism has been shown to be much more economically viable than any monetary benefit related to duck shooting.

If the duck shooting season does go ahead, despite clear evidence that it should not, then significant restraints must be placed upon the season and GMA must undergo a serious review of their functioning and their method of conducting aerial surveys.

We believe it is irresponsible to hold a 2022 recreational duck shooting season in Victoria. It risks the long term viability of duck populations, increases the risks to humans and animals from the loss of biodiversity and the increased risk of zoonotic diseases and has negative impacts on already struggling regional communities. Wetlands are being destroyed and illegal shooting of waterbirds is pervasive throughout Victoria. We therefore recommend that the Game Management Authority (GMA) supports a moratorium on the 2022 duck season.

Critically, the Minister's decision about whether to hold a duck shooting season should be based upon recommendations from an independent body with no financial interest in the outcome due to the clear conflict of interest that exists when the GMA are responsible for this recommendation.