



**CONSIDERATIONS  
FOR THE 2023 DUCK  
SEASON**

**Wildlife Victoria  
Response  
January 2023**

## Summary

Wildlife Victoria understands that the Game Management Authority (“GMA”) is seeking any additional data or input in response to the *Considerations for the 2023 Duck Season* document dated 20 December 2022.

Wildlife Victoria accordingly provides input.

## About Wildlife Victoria

Wildlife Victoria is a not-for-profit organisation that has provided the Victorian public with a statewide wildlife emergency response service for 35 years. The organisation’s staffing consists of a head office, centralised 24/7 phone-based Emergency Response Service, and in field wildlife veterinarians and veterinary nurses together with a statewide network of over 1,200 trained wildlife rescue volunteers.

In 2022, Wildlife Victoria responded to over 110,000 calls for help from the Victorian public for sick, injured and orphaned wildlife and assisted 62,000 animals across 410 species. Wildlife Victoria’s Emergency Response Service is staffed 24/7, 365 days a year and is experiencing a consistent 15% year on year increase in demand for services.

In addition to our wildlife operational response, through our education and advocacy programs Wildlife Victoria helps wildlife by providing people with the knowledge and skills they need for peaceful and positive co-existence with wildlife, and facilitating positive community attitudes toward wildlife.

## Wildlife Victoria’s Position

We note that the GMA has articulated it understands Wildlife Victoria’s position and this is acknowledged. Wildlife Victoria nevertheless confirms our position which is that Wildlife Victoria is opposed to duck hunting in any form and calls for its immediate and permanent end.

Wildlife Victoria also highlights the long-term decline in water bird numbers, and the negative impact duck shooting has on other wildlife residing in the shooting areas.

Wildlife Victoria also urges the GMA to consider the negative impact on domestic and international tourism, and the damage duck hunting has on Victoria’s cultural and environmental reputation.

## Considerations

### Legislative Considerations

Wildlife Victoria requests that the GMA consider the aspects of the *Plan for Victoria’s new animal care and protection laws* issued by the Victorian Government Department of Jobs, Precincts and Regions for consultation in September 2022. These proposed laws are in line with growing community concern over the treatment of wildlife species that are already under threat from climate change, urbanisation and habitat fragmentation.

“The Objectives of the new laws would recognise that animals have the capacity to feel, perceive their environment, and to have positive and negative experiences like pleasure and pain – that is, that animals are sentient.”<sup>1</sup> ‘Animals’ covered by the new laws include ducks.

Considering the well understood and well documented pain that being shot causes, Wildlife Victoria asks that the GMA consider the viability of the strategic positioning of the continuation of duck hunting within this soon to be new frame of reference.

Wildlife Victoria asks that the GMA provide documentation of the processes they will be using to build their strategic case for the continuation of duck hunting within this changed legislative and cultural environment.

In addition, Wildlife Victoria asks that the GMA consider a reduction in bag limits and the duration of duck hunting season to an eventual phasing out of duck hunting by 2025 to reflect the government’s understanding of the continued change in community expectations and the ongoing decline in community support for duck hunting as reflected in the proposed new legislation.

### **Community Expectations**

Duck hunting popularity and support has long been in decline, with now only approximately 11,549 shooters taking part in last year’s duck hunting season,<sup>2</sup> while an RSPCA survey states that 68% of Victorians want an end to duck hunting.<sup>3</sup>

“The research also showed that 69% of people were interested in visiting parts of regional Victoria, with more than half (54%) preferring to visit a location where duck hunting does not occur.”<sup>4</sup>

Figures in the *Out for a Duck* report show even less support, quoting that 87% of Victorians support a ban on duck hunting.<sup>5</sup> This lack of support for duck hunting reflects a mainstream rejection of the cruelty inflicted on ducks through duck hunting. It also reflects the community view that cruelty to animals is unacceptable which is outlined in the new animal care and protection laws currently under consideration in Victoria:

“An act of cruelty would be primarily defined in the new laws as any act or omission that causes or is likely to cause unreasonable harm, pain or distress to an animal. Harm, pain or distress could be mental, as well as physical, and include experiences such as hunger, stress and fear.”<sup>6</sup>

Wildlife Victoria asks the GMA to consider that the Victorian public does not support duck hunting, and by continuing to pursue this unpopular project the GMA is, on balance, damaging the Victorian government’s relationship with the Victorian public. Wildlife Victoria asks the GMA to consider that

---

<sup>1</sup> Plan for Victoria’s new animal care and protection laws Victorian Government Department of Jobs, Precincts and Regions September 2022

<sup>2</sup> <https://rspcavic.org/rspca-urges-leaders-to-cancel-2022-duck-hunting-and-protect-our-native-ducks/>

<sup>3</sup> <https://rspcavic.org/rspca-urges-leaders-to-cancel-2022-duck-hunting-and-protect-our-native-ducks/>

<sup>4</sup> <https://rspcavic.org/rspca-urges-leaders-to-cancel-2022-duck-hunting-and-protect-our-native-ducks/>

<sup>5</sup> Out for a Duck An analysis of the economics of duck hunting in Victoria September 14, 2012 by Rod Campbell, Richard Denniss and David Baker

<sup>6</sup> Plan for Victoria’s new animal care and protection laws Victorian Government Department of Jobs, Precincts and Regions September 2022

continuing duck hunting regardless of public opinion undermines the public's confidence in the government and reduces public trust in both the government and the GMA.

In addition, Wildlife Victoria asks the GMA to outline its process for considering the above factors in its recommendations for duck hunting.

### **Economic Benefit**

The most recent report published by the government is the *Economic contribution of recreational hunting in Victoria*<sup>7</sup> report published in June 2020. It is based on data derived from a survey of game licence holders in Victoria. The figures in the report cannot be verified and there is no cost-benefit analysis in the report.

The lack of any publicly available documents that report on the true economic benefits of duck hunting leads Wildlife Victoria to believe that there are limited to no economic benefits. In contrast, the economic benefits of birdwatching and wildlife tourism are well documented and provide compelling evidence for ending duck hunting. The 2012 report "Out for a duck - An analysis of the economics of duck hunting in Victoria" by the Australia Institute provides the following summary:

#### "Summary

- Less than half of one per cent of Victorians are active duck hunters, while 87 per cent support a ban on duck hunting. Three per cent of respondents to our survey had participated in duck hunting and intend to do so again.
- Claims that duck hunting – or any recreational hunting – contributes significantly to the economy of Victoria are false. They assume that without hunting any related expenditure would be lost to Victoria. On the contrary, our survey shows that if duck hunters were prevented from hunting ducks they would go fishing, hunt other species, or go camping. There would be no impact on expenditure in Victoria from a duck hunting ban.
- Revenue from non-hunting tourism is far more important to Victoria's economy. In fact, more than half of survey respondents would be less likely to holiday in an area with duck hunting.
- Most Victorians are willing to pay for improvements in animal welfare.
- Thirty per cent of respondents are willing to pay to end duck hunting.

The non-monetary benefits of ending duck hunting and the improvement in welfare of the non-duck hunting public, are far greater than the non-monetary losses that hunters would incur from a ban. We estimate this benefit of banning duck hunting at around \$60 million per year."<sup>8</sup>

Wildlife Victoria asks the GMA to consider the negative economic impact duck hunting has on Victorian tourism. Wildlife Victoria asks the GMA to consider undertaking an immediate and comprehensive

---

<sup>7</sup> [https://djsir.vic.gov.au/\\_data/assets/word\\_doc/0009/1948707/v.4Economic-contribution-of-recreational-hunting-in-Victoria-accessible.docx](https://djsir.vic.gov.au/_data/assets/word_doc/0009/1948707/v.4Economic-contribution-of-recreational-hunting-in-Victoria-accessible.docx)

<sup>8</sup> Out for a Duck An analysis of the economics of duck hunting in Victoria September 14, 2012 by Rod Campbell, Richard Denniss and David Baker

review of the economic, environmental, and reputational cost to the Victorian public for the GMA to administer the duck hunting program.

In light of current data available, Wildlife Victoria asks the GMA to consider a reduction in duration of duck hunting season to an eventual phasing out of duck hunting by 2025 reflecting that the GMA understands the negative impact duck hunting has on the Victorian tourism industry and that a continuation of duck hunting into the future will continue to cause harm to the tourism industry that is not outweighed by the benefits of duck hunting.

### **Compliance and Enforcement Capability**

Wildlife Victoria refers to the *Assessment of the GMA's compliance and enforcement function* conducted by Pegasus Economics in 2017. This assessment documented that the GMA had deep structural and operational problems rendering it largely ineffectual.

“The GMA’s inability to ensure compliance with the hunting laws has seriously undermined its credibility as an independent and effective regulator and raises questions about the integrity and sustainability of the regulatory regime.”<sup>9</sup>

Wildlife Victoria has not been supplied with any documentation of the implementation of the structural or operational changes recommended in the report, and as such maintains the view upheld in the report that the GMA may not be an effective regulatory body.

The report highlighted that the GMA was not capable of enforcing the specific requirements around licensing, species identification, bag limits, or reporting required during the duck hunting season.

To further support the assessment review’s findings and Wildlife Victoria’s understanding that little to no change has been implemented, Wildlife Victoria has evidence of widespread shooting of ducks that are excluded from the allowed species list.<sup>10</sup>

Given the importance of compliance and enforcement to ensure adequate protections for threatened and endangered waterbirds, Wildlife Victoria requests that the 2023 duck hunting and any future season are paused to enable the GMA to address and implement the recommendations of the report, and that any changes that are implemented are communicated to Wildlife Victoria to satisfy that the concerns and recommendations raised in the report have been addressed.

In particular Wildlife Victoria seeks clarification from the GMA on the processes they will implement to ensure hunter compliance with the duck hunting shooter requirements. Wildlife Victoria seeks clarification on the GMA’s process for deciding the number of duck hunting locations given its lack of capacity to adequately monitor all locations.

Wildlife Victoria also calls on the GMA to consider the long-term implications of using the same small group of survey and data contractors on the integrity and independence of the reports supplied by the contractors. Wildlife Victoria requests the provision of process documents outlining the GMA’s

---

<sup>9</sup> Assessment of the GMAs compliance and enforcement functions 2017 Pegasus Economics 2017

<sup>10</sup> “‘Terrible tragedy unfolding’ Threatened species gunned down during duck season” Michael Dahlstrom Yahoo News Australia 17 March 2022

management of conflict of interests for externally contracted services, along with the tendering process documents for external contractors, reporting requirements, and selection processes.

### **Ducks left injured or dead in field**

Wildlife Victoria has documented in-field evidence of widespread hunter non-compliance of the requirement to retrieve dead or injured animals while hunting. It is acknowledged by the GMA that it is currently logistically impossible for the GMA to ensure compliance of this requirement in field.

“Some of these ducks will be killed outright. Some will be wounded, brought down and killed on retrieval. Many others will be crippled or wounded and will die within a few hours or days. Some will suffer prolonged pain before they die.”<sup>11</sup>

Ducks treated by Wildlife Victoria at Lake Bael Bael 16-18 March 2022:

Species	Record Count
Duck, Grey Teal	10
Shoveler, Australasian	3
Swan, Black	2
Duck, Pink-eared	2
Duck, Pacific Black	2
Duck, Hardhead	1
Coot, Eurasian	1
<b>Total</b>	<b>21</b>

In all cases any birds alive were euthanised given the severity of their injuries, and all other birds examined which had been left in field were x-rayed and shown to have gunshot pellets inside their bodies or gunshot wounds.

### **Threatened and endangered species**

Wildlife Victoria has documented in-field evidence of widespread hunter non-compliance of shooting only the listed game ducks.

“Among the dead are blue-winged shovelers and a hardhead, species which the state government has this year explicitly warned are [“listed as threatened due to declining populations”](#).”<sup>12</sup>

It is currently logistically impossible for the GMA to ensure compliance of this requirement in field, and the occurrence of species being moved off the hunting list and being placed straight onto the threatened list raises serious concerns as to the veracity of the survey data and the processes used by the GMA in consideration of species selection.

---

<sup>11</sup> <https://kb.rspca.org.au/knowledge-base/what-is-the-rspcas-view-on-duck-hunting/>

<sup>12</sup> “‘Terrible tragedy unfolding’ Threatened species gunned down during duck season” Michael Dahlstrom Yahoo News Australia 17 March 2022

Wildlife Victoria asks that the GMA provide information about the process the GMA uses to check the veracity of the survey data used in its considerations.

**Wildlife Victoria Data**

Over the last five years, Wildlife Victoria has tended to 11,468 ducks across Victoria.

Species	Record Count
Duck, General	5338
Duck, Wood	2831
Duck, Pacific Black	2786
Duck, Muscovy	184
Duck, Chestnut Teal	70
Duck, Mallard	59
Duck, Grey Teal	52
Duck, Australian Shelduck (Mountain)	36
Duck, Teal - Unidentified	29
Duck, Pekin	19
Duck, Musk	15
Shelduck, Australian	12
Duck, Hardhead	12
Duck, Pink-eared	8
Duck, Freckled	7
Duck, Blue-billed	7
Duck, Maned	3
<b>Total</b>	<b>11468</b>

Wildlife Victoria has detailed data sets on location and species of ducks throughout Victoria. Wildlife Victoria requests that the GMA develops a process to request and use Wildlife Victoria’s data in its consideration for setting bag limits, locations and season durations.

**Ecosystem and biodiversity impacts**

Last season Wildlife Victoria witnessed the impact of duck shooting on many species beyond the ducks targeted by shooters. Wildlife Victoria witnessed the loss of a new generation of swans as brooding swans abandoned their nests and eggs in response to loud and unrelenting gun shots. None of the impacts of duck shooting on surrounding wildlife is quantified in the supplied reports.

**Amenity impacts**

There has been no data supplied by the GMA regarding the impact of duck hunting on people living in proximity to duck hunting locations. With an increase in people living and working in regional Victoria in recent years, and the expansion of residential developments into areas closer to duck hunting locations, the impact of duck hunting on local residents must now be considered by the GMA.

Wildlife Victoria receives increasing reports from members of the public concerned about the negative impact of duck hunting, not only on wildlife, but also on their personal amenity. People are unable to work and sleep, they are worried for their safety on their own property, and their pets and farm animals are distressed for extended periods.

### **Wildlife Victoria Resource Management**

There is significant workload placed on Wildlife Victoria due to the impacts of duck hunting. Wildlife Victoria is already under increasing public pressure to do more for our wildlife, and duck hunting creates an unnecessary drag on resources. Wildlife Victoria is experiencing an increase in calls for help of 15% year on year for all wildlife, with climate change, habitat destruction and habitat fragmentation being the main causes for wildlife suffering. This year Wildlife Victoria will spend time and resources educating the public and media about the impacts of duck hunting, and why Wildlife Victoria is seeking an end to it. Wildlife Victoria will also spend time speaking with state and local governments, and many other stakeholder organisations.

If Wildlife Victoria were no longer needed to treat ducks in the field or advocate for duck welfare, Wildlife Victoria would be able to reallocate these resources to provide greater outcomes for other wildlife that desperately need support to survive.

Wildlife Victoria spends more than \$7M p.a. on wildlife veterinary services and operational costs associated with provision of an on call wildlife emergency response.

The services provided by Wildlife Victoria to the GMA and police in field during duck hunting season are of significant value to the GMA and wildlife. Wildlife Victoria is on site during duck hunting season providing veterinary care to injured animals, accurately identifying species, and providing radiographs, veterinary case notes and other useful information to authorised officers helping them to ensure compliance with hunting standards. This collegial and valuable service is provided at no cost to the GMA, however Wildlife Victoria asks that the cost of providing this service is considered in the overall cost of running the duck hunting season.

### **Recommended actions:**

1. The GMA recommend an immediate and ongoing cancellation of duck hunting.

#### **If the above recommendation is not adopted by the GMA, Wildlife Victoria have further suggestions for urgent consideration**

2. Reduction in the duration of duck hunting season to an eventual phasing out of duck hunting by 2025 to reflect that the government understands the continued change in community expectations and the ongoing decline in community support for duck hunting.
3. An immediate and comprehensive review of the economic, environmental, and reputational cost to the Victorian public for the GMA to administer the duck hunting program.
4. Reduction in duration of duck hunting season to an eventual phasing out of duck hunting by 2025 to reflect that the government understands the negative impact duck hunting has on the Victorian tourism industry.
5. Immediate government review into the role, scope and purpose of the GMA.



6. Immediate public review of external survey contractors, audit of associated risks, and conflict of interest registers.
7. Immediate review of hunter species identification testing, and species listing processes.
8. An immediate review of duck shooter requirements, including a new requirement that duck shooters wear a body cam while hunting, and that footage must be submitted to the GMA for audit.
9. An immediate review of the impact of duck hunting on surrounding wildlife with remediation recommendations.
10. An immediate survey of duck hunting sites providing population data for residential areas within gunshot hearing range, with a commitment to reducing duck hunting sites in populated areas and restricting shooting to locations that are able to be properly monitored.

## **Conclusion**

It is well beyond the time to end duck hunting in Victoria. Recreational duck shooting was banned in Western Australia in 1990, NSW in 1995 and in Queensland in 2005. With the long-term decline in water bird numbers, widespread public condemnation of duck shooting, the inability for the GMA to properly oversee the program, the economic and reputational cost to the Victorian public, and the needless cruelty inflicted on the ducks, Wildlife Victoria renews its calls for the immediate and permanent end to duck shooting in Victoria.