



**Response to the IHM framework & its  
use to determine recommendations for  
Victorian Duck Season 2022**

**January 2022**

## BACKGROUND

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This report has been prepared following significant involvement and consultation as a stakeholder over an 18 year period. In the past 12 months there has been review by FGA and other hunting organisations of documents and information provided by the Department of Job, Precincts and Regions (DJPR), Department of Environment, Water, Land and Planning (DEWLP) and the Game Management Authority (GMA). Consultation with hunting organisations and other stakeholders and a video presentation by Professor Marcel Klaassen have occurred in recent months to assist stakeholders in understanding how the model was applied.

Field & Game Australia (FGA) has previously prepared a written submission as requested by Game Management Authority the Department of Jobs, Precincts, and Regions (DJPR) alongside other stakeholders with regards to the proposed interim harvest management framework (IHM framework) in October 2021 and this was provided to our members via the website.

1. The current 5 indices are considered appropriate; however, it is imperative that the helicopter surveys from SE Australia continue to be built into the modelling and somehow less weighting is applied to the EAWS. Transition of data from each of the 5 indices to setting proposed bag limits and season lengths, needs to be easily articulated in messaging to licence holders in a manner that can be understood. This is not currently the situation.
2. Clarification is sought around what is viewed by our members as a conservative 10% take, currently this has been met with resistance from hunters and requires further explanation. Licence holders and members alike are fixated on this being based on data from other countries and despite being accepted as world standard or best practice, it's being challenged as not being relevant to Australian conditions and unnecessarily precautionary. Without further explanation and expansion on this topic gaining acceptance and educating stakeholder members will be challenging.

## BACKGROUND

3. Strong stakeholder understanding and support will be essential to gain acceptance of an adaptive approach to harvest management that incorporates mathematical models and FGA feels there's more work to be done in presenting the case to our membership in a manner that will be understood and accepted. This should be the responsibility of all stakeholders to come up with a way of conveying the message in a simple and consumable fashion for licence holders.

Clarity in the process that leads from a science- based data and sound evidence and how that related to bag limits, season lengths and sustainability in hunting seasons is paramount in gaining licenced hunter acceptance. Professor Marcel Klaassen's explanation to stakeholders should perhaps be made public in an attempt to assist educating licence holders.

More recently, on December 23rd, 2021, the following documents were forwarded for us FGA to consider, with the following instruction.

- Considerations document
- Using duck proxies
- Preliminary results– Victorian game duck abundance survey
- Eastern Australia Waterbird Survey

### Invite for Written submissions

*The GMA invites your organisation to provide comments on the data the GMA provides, including the output of the interim harvest decision framework, and any additional data that may assist in a recommendation on the possible arrangements for the upcoming 2022 duck season.*

*The GMA is not seeking any information or advice on the policy of whether or not duck hunting should, in principle, be permitted in Victoria. Comments and additional information received will be posted on the GMA website.*

*Comments and information must be lodged with the GMA by COB 6 January 2022. Comments and any additional information will then be considered by the GMA Board before a recommendation is made to the Minister for Agriculture.*

*Unlike in previous years, the GMA will not be inviting stakeholders to provide a verbal presentation as part of this process.*

## **BACKGROUND**

We note the timings around the information provided, the timeline in which to respond are less than adequate for our organisation to review, critique and assemble a more detailed response as we reserve the right to amend and change our feedback or stance should our organisation deem it necessary.

The Victorian Government has demonstrated that it is committed to Sustainable Hunting within Victoria and has further funded the Sustainable Hunting Action Plan 2021 – 2024? (SHAP 2.0) to deliver tangible outcomes for the hunting community into the future.

As part of the SHAP there is a commitment to develop and deliver an Adaptive Harvest Management Model (AHMM). The AHMM is not a new concept and FGA has been advocating (In Principle) for the past 18 years for this model to be developed and used to determine duck seasons for Victorian Hunters rather than a subjective process.

The IAHM model has been developed and feedback from FGA through consultation as a member of the stakeholder group who have been informed of the considerations to this point.

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Field & Game Australia continues to support the Adaptive Harvest Management model 'in principle', as it has done since its inception back in 2003. The concept of introducing an interim framework is a cautious approach designed to allow refinement over a period of years. This allows all stakeholders to continue consultation and assist in developing best practice.

We are pleased to see this approach in the introduction and adoption of a well-considered model that has been refined through trial and no doubt to a degree some error, which is a welcome alternative to the old processes used for determining duck season length and daily bag limits.

FGA remains committed to being part of the genuine consultation process and assisting the implementation of the interim model for the 2022 season, whilst achieving the most positive outcomes for our membership and ensuring sustainability of hunting opportunities into the future. Additionally we look forward to ongoing consultation in implementing further change and refinement is an effort to develop the best model for the future.

Transparent triggers for season length or bag limit modifications have been developed, however FGA feel further consultation around this issue with stakeholders and their members to gain hunter acceptance is an essential part of the approach to developing a permanent model.

## BACKGROUND

For that to occur the duck counts and harvest monitoring need to be adequately explained, resourced and they need to be defended as fit-for-purpose and inclusive of hunter stakeholder consultation. It is our expectation that as the ARI Helicopter surveys evolves and the survey gaps are resolved that the EAWS data will be removed from the modelling. However, this needs to be verified and a commitment from authorities to stakeholders forthcoming.



## CONCLUSION CONTINUED

**The purpose of this response is to provide feedback to the GMA of FGA's commitment to contribute to making this proposal work and be delivered on time.**

It is our position that the introduction of an IHM model or indeed the final AHM model can be held up no longer. FGA will continue to work alongside stakeholders to enable the successful introduction of this new approach.

There needs to be ongoing consultation on how we deliver the results, share the consistent messaging and transition our membership into acceptance and ownership of this new approach, together with a clear explanation of its rationale.

FGA see this to be a joint responsibility between GMA and FGA as stakeholders. The data is defensible and transparent, and the process needs to be delivered to licence holders in a manner that can be understood and acceptable by the vast majority. Acceptance is currently tentative and there are many who believe that the data included has been selective and chosen to deliver a preconceived outcome.

Authorities need either allay hunters fears that a ten bird limit and full length season is not achievable or demonstrate transparently, what justification there is to introduce a system that ultimately reduces the harvest.

Currently our members cannot see that a 10-bird bag limit and full length season will ever be achieved under IHM, nor do they understand how we ended up with the current proposal of 4.

There needs to be a clear demonstration that a bag limit of 10 birds and full season is achievable and how that would be determined. Clarity of explanation of how the determination for season settings is unclear to hunters and there is a natural fear that the likelihood of a 10-bird limit is achievable in the future. If this is true it needs to be clearly spelled out and explained and justification given.



## CONCLUSIONS CONTINUED

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### What this IAHM framework has delivered to date:

#### Positives

- Reduced the political influence
- Reduced the emotive influence
- Eventually the IAHM framework should deliver more timely decisions (December each year) FGA has advocated for many years that an ideal timeline would be so Season parameters be confirmed and locked in by December 1. Allowing time for industry retail stakeholders to have adequate stock on hunting equipment especially steel shot ammunition otherwise there is a risk of non-compliance of the use steel shot regulation.
- Science and Data based decisions that are defensible once correct data is used in the input
- True stakeholder consultation
- A monitoring program to determine game duck abundance in Victoria was developed in 2020 and further refined in 2021, genuine stakeholder engagement will shape further refinement
- A fixed season length that removes doubt and creates certainty for all stakeholders that begins on the 3<sup>rd</sup> Saturday of March and runs through to the second Monday in June.
- Increased hunter opportunity over the recent/current trend to shorten season length as well as bag limit
- Sustains the future of duck hunting in Victoria as supported by the Government
- The monitoring program was trialled in November 2020 and further refined in 2021
- Aggregate point score system over 3 years will mean a longer impact from favourable conditions
- Rarely will the bag limit applied be below the average harvest number per hunter
- Increased hunter opportunity with regards to season length or days able to be hunted
- Is defensible and gains social acceptance (social licence)
- There is opportunity to be part of the consultation around refinement/improvement as a stakeholder

#### Negatives

- Aggregate point score system over 3 years will mean a longer recovery period from poor conditions
- The result of 4 bird daily bag limit as a recommendation for 2022 creates concern that a 10 bird limit will be unachievable or rarely achieved The modelling for the IAHM when applied to the previous 30 years indicates only 2 years of 10 bird bag limits. This is a result of the inputs being driven by the EAWS which is not fit for the purpose of determining game bird seasons. This will simply not be accepted as a reasonable outcome by the hunting community.

## CONCLUSION CONTINUED

- Hunter apathy – many hunters will not travel or spend time and effort to set up decoys and hunt in a manner consistent with (WWRAP) ethics for low bag limits such as 4
- This has the potential to place increased hunting pressure on locations closer to Melbourne such as the Connewarre SGR
- This also has the potential for hunters to focus on species specific hunting, in turn perhaps applying additional pressure to species such as Pacific Black Duck
- There is concern, that the result of the above point will drive hunting underground (i.e. hunters will refuse to be members of hunting organisations and refuse to purchase game hunting permits, but continue to hunt illegally)
- Hunters who readily achieve a 10-bird limit on hunts, will feel disadvantaged on all but those years where we have had favourable habitat and breeding conditions for multiple years running allowing for a 10-bird bag limit.
- FGA members believe that a truly ADAPTIVE harvest model would allow more than 10 birds to be harvested, if the model has an upper limit added its not adaptive.
- The perception that the AHM model could lead to bag limits above the prescribed number of 10 in the regulations was never a consideration by Government. FGA members believe that If an AHM is to be truly adaptive then when conditions are suitable then the model should work in a manner it can prescribe a bag limit of higher than 10.
- There will still be intervention and endorsement required by Government, rather than the season just going ahead as per regulation. (Dependant on update of regulations due shortly)
- Flow on impact is likely lower numbers of game licences sold and lower numbers of hunter organisation memberships sold
- Hunter organisations may be seen by hunters as less relevant and lose opportunity to be the educators and deliverers of future training/competency testing/advocating for responsible hunting
- Blue-winged Shoveler made up less than 1% of the count and therefore were excluded from the modelling. FGA continue to advocate for further research on this species to assist their recovery in numbers (a review of sampling survey locations and timing required to determine if key habitat that this species is known to frequent is representative. Hunting organisations with their knowledge should play an essential role in this selection process.)
- The process is over complicated whereas a simpler model such as the ARI survey data in conjunction with produces a simpler set of numbers with upper and lower trigger points would produce a far more effective and transparent Harvest Model.



