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DUCK HUNTING IN VICTORIA 2021



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Acknowledgments

Field & Game Australia (FGA) would like to acknowledge the members of the Duck Season Submission Panel (DSSP) for volunteering their time to undertake extensive reading and participate in regular meetings to advise FGA in the development of this submission.

The Board of FGA acknowledges the continued contribution of our branches and its membership. From our foundations to the present day, our members have been unwavering in working towards achieving our mission and objectives for the betterment of the whole community.



FGA acknowledges the traditional owners of the land in which we live, work and hunt as being custodians of this land for thousands of years. FGA acknowledges their traditions and culture and pays our respect to their Ancestors, their Elders and further extends that respect to all Indigenous people.

Executive Summary

On behalf of Field & Game Australia (FGA) and its 16,000 members, we thank the Game Management Authority (GMA) for the opportunity to submit additional information relating to the 2021 Victorian Duck Season arrangements.

This submission is made by invitation of the GMA for consideration when providing their recommendations to the GMA Board. The GMA has specifically requested that those organisations that have been invited to make a written submission do so to provide 'additional' information to what is already available. Following the submission process, the GMA Board then in turn makes recommendations to the Minister for Agriculture in relation to the 2021 Victorian Duck Season.

The Wildlife (Game) Regulations 2012 are very clear with regards to the length of season and bag limits. FGA can provide no rationale that would preclude the setting of a 2021 legislated game bird season as it is prescribed in the Wildlife (Game) Regulations 2012. FGA's position is that, if the government has the intent to make legislative changes then they should do so with consultation during the review of the Wildlife (Game) Regulation 2012 which will take place in 2021.

FGA will always base its position on evidence that it can defend, however, it is our belief that the current submission process can lead to information being provided by some stakeholders that is subjective, biased, and empirical. In this submission, FGA has been mindful of this and has focused on providing information that will allow the Minister(s), if required, to make decisions based on the facts rather than on ideology.



Executive Summary

In 2016 the Victorian Government has made a commitment to introducing an Adaptive Harvest Management (AHM) Model (known then as Waterfowl Conservation Harvest Model) to improve the way in which duck season decisions are made within the Sustainable Hunting Action Plan. The AHM model has still not been fully developed and has not been deployed to allow for a data-driven decision-making outcome that will mitigate any actual or perceived bias. Utilising evidence-based science and data must be the key consideration for decisions around duck season and outcomes.

FGA welcome the recent commitment by the GMA to aerial surveys being conducted by helicopter in Victoria to increase available data to be used as an input for the AHM model. FGA would further like to see the GMA implement additional research projects around duck populations and recovery as outlined within the Sustainable Hunting Action Plan 4.1 (undertake research, monitoring, and evaluation) and 4.2 (improve State Game Reserve habitat) rather than continue to rely on research that is not for the purpose of game season setting.

Within the submission, FGA has identified several considerations with regards to delivering positive outcomes for the sustainability of duck hunting in Victoria. In producing this submission, FGA has relied on published documents and trusted sources to provide the GMA with information, much of which FGA can work collaboratively to implement, that is backed by evidence and the principles of sustainability and ethical hunting.

In consideration of the legislated season being implemented, the FGA would also draw attention to the two-year pilot program implemented by the Department of Economic Development, Jobs, Transport & Resources (DEDJTR) (now known as Department of Jobs, Precincts, and Regions - DJPR) as part of a modified season in 2018. The pilot changed the hunting times on the first weekend of the season to understand the benefits of opening the season during daylight hours. Neither DJPR nor the GMA has yet to provide any report on the pilot program (which has now been in place for three years 2018, 2019 & 2020), and has not provided any benefit analysis from the pilot. Until any benefit can be articulated to all stakeholders these changes are not supported for the 2021 season.

Our recommendations

- FGA can provide no rationale that would preclude the setting of a legislated game bird season in 2021 as prescribed in the Wildlife (Game) Regulations 2012
- Neither DJPR nor the GMA has provided any evidence for the benefits of modified opening times as part of the two-year pilot, therefore the continuation of the modifications are not supported for the 2021 season. Arrangements should return to being consistent with the legislated game bird season
- That in 2021, the economic and social welfare impacts are given due considerations in the seasonal hunting arrangements to aid the recovery from the impact of bushfire and the COVID-19 pandemic



Background

The Wildlife (Game) Regulations 2012 prescribe for an annual duck season running from 3rd Saturday in March until the 2nd Monday in June in each year (87 days in 2021) and a daily bag limit of 10 game birds. Section 86 of the Wildlife Act 1975 enables the responsible Minister(s) to vary these arrangements.

FGA was established by duck hunters in 1958 with strong principles for the conservation of wetlands, sustainability of duck hunting, ethical hunting, and ensuring that the hunting of ducks continues for generations into the future. The FGA mission statement takes on the words of King George VI - *"The wildlife of today is not ours to dispose of as we please, we have it in trust, we must account for it to those who come after"*. Those principles remain our focus with the future in mind and with an absolute commitment to the sustainability of the resource while representing our membership with a responsible and ethical approach. FGA represents 67 branches nationally, 57 in South Eastern Australia, and is governed by an elected Board representative of all FGA interests - conservation, hunting, and target shooting. FGA makes decisions based on the future sustainability of our wetlands. This ensures FGA is not ideologically based and sets us apart from other organisations and interest groups.

The Game Management Authority (GMA) is an independent statutory authority responsible for the regulation of game hunting in Victoria under the Game Management Authority Act 2014. Part of their statutory function is to make recommendations to the Minister for Agriculture in relation to open and closed seasons, bag limits, and declaring public and private land open or closed for hunting.



Background

Many factors are reviewed each year to ensure duck hunting remains sustainable, including current and predicted environmental conditions, habitat extent, duck population distribution, abundance, and breeding. The current duck season submission process is widely accepted as being imperfect. The GMA themselves have described the process as, 'an opinion-based system for deciding whether there will be a duck season, for how long and how many ducks can be taken'. FGA has argued and will continue to argue that we cannot continue to make game management decisions on subjective opinions. The duck season in Victoria is legislated. Change to legislation may occur by the way of the use of Ministerial powers or by way of an Act of parliament, the change must be based on facts and data, not speculation and subjective opinion.

It stands as a 2018 Australian Labor Party (Victoria) election commitment that an Adaptive Harvest Management (AHM) model will be developed and deployed. In a letter to the Australian Deer Association in 2018, former Agriculture Minister, Jaala Pulford wrote that 'Labor will finalise development of the AHM to improve the way in which we assess duck and other bird numbers, and to inform duck season decisions. The finalisation of this model will be subject to consultation with an expert panel. This method will strengthen the scientific basis and continue to take the politics out of determining duck numbers.' FGA continues to support this approach, in-principle, and will remain as advocates for the implementation of the AHM model. This in-principle support is subject to appropriate and relevant inputs in consultation with the three major hunting organisations - conserving continued harvest and ensuring appropriate harvest levels that maintain the sustainability of the resource and promote ethical hunting for seasons to come.

FGA made a submission to the GMA for the 2020 Duck season which recommended a modified season, with a bag limit reduction of six birds. This recommendation was based on the facts and data and not an unsupportive or emotional narrative. The recommendations were unsupported with the GMA finally recommending a three bird per day bag limit. This GMA position provides a perception, rightly or wrongly, that although a submission process is undertaken, the GMA applies a consultative, but not a collaborative approach to season recommendations. This view is a common one shared within the hunting community that looks to FGA to represent them as the premier duck hunting organisation within Australia.

FGA undertakes its representation of members very seriously and as such completes a significant review of all relevant information when producing its submission each year. This year FGA appointed a panel of members and respected academics as advisors to undertake the review of information and provide advice to FGA.

Background

There are currently 25,042 hunter licences to hunt duck in Victoria. This number has been stable over the past 10 years with a 5.2% increase in game licences with duck entitlements for the period 30 June 1996 and 30 June 2019. This is in contrast to claims by some organisations which state that duck hunter numbers are in decline.

Over the past 25 years, there have been four duck seasons cancelled (1995, 2003, 2007 & 2008) and a further fifteen seasons modified (1998, 2000, 2001, 2002, 2004, 2005, 2006, 2009, 2010, 2015, 2016, 2017, 2018, 2019, 2020). It is of note that the growth in licences with a Deer entitlement follows a less variable approach to season setting arrangements in the last 10 years, something that duck hunters have been advocating for.

The 2020 duck season was the most recent and heavily modified season. GMA harvest estimates data state that the total harvest was 60,403 compared to the 2019 harvest estimate of 238,666 and an eleven-year average estimate of 347,160 birds harvested. It is critical to remove the 2020 harvest from estimates as the season was further impacted beyond season setting arrangements due to the COVID-19 pandemic. Mandated “lock-downs” and travel restrictions of a large sector of the Victorian population precluded hunters from accessing hunting sites and the hunting activity and subsequent harvest was not representative of the duck population numbers or the popularity of duck-hunting. In doing this, the ten-year seasonal harvest average is 373,229 game

Year	Australian Wood Duck	Blue-winged Shoveler	Chestnut Teal	Grey Teal	Hardhead	Mountain Duck	Pacific Duck	Pink-headed Duck	Total harvest	Hunting days	Ducks per licence holder	Hunting days per licence holder	Ducks per hunting day
2009	131,084	NA	13,178	20,819	NA	2,173	55,150	NA	222,302	78,659	11.10	3.98	2.79
2010	112,360	216	14,354	26,011	324	5,936	96,407	0	270,574	85,801	12.54	3.98	3.15
2011	132,900	4,054	49,812	211,034	25,857	8,080	156,484	12,597	600,739	103,450	26.02	4.48	5.81
2012	150,160	1,319	23,506	110,574	30,222	9,234	160,704	21,587	508,296	109,718	21.19	4.60	4.61
2013	106,563	7,104	39,804	135,947	7,349	2,084	92,714	30,129	422,294	91,748	17.24	3.75	4.60
2014	131,282	4,155	29,866	127,126	6,363	8,440	127,646	14,154	449,320	118,800	17.29	4.57	3.78
2015	80,164	1,497	19,466	79,945	998	6,860	81,340	15,839	286,729	90,634	11.35	3.59	3.16
2016	77,965	NA	18,097	77,060	506	6,454	88,850	1,645	271,576	100,749	10.73	3.98	2.70
2017	90,929	NA	13,639	175,038	8,093	12,124	118,460	20,080	438,353	96,508	17.36	3.83	4.53
2018	89,364	NA	27,123	122,941	4,816	6,971	132,827	12,674	398,708	91,570	15.65	3.62	4.32
2019	57,588	NA	13,528	83,421	621	6,688	83,031	3,103	238,666	81,023	9.62	3.27	2.94
2020	18,204	NA	4,374	8,028	0	3,783	27,778	236	60,403	29,501	2.58	1.28	2.05
Average	98,216	3,191	22,228	96,338	7,722	6,787	101,923	12,004	347,160	89,680	14.39	3.74	3.64

CONSIDERATIONS FOR 2021



Eastern Australian Waterbird Survey 2020

In 2020, led by Professor Richard Kingsford the University of NSW conducted the Eastern Australian Waterbird Survey. The survey is undertaken each year for the purpose of understanding the breeding habitat and index of abundance of waterbirds across eastern Australia.

The survey was not designed as a platform to be used for the setting of game seasons but rather as an indicator of breeding activity, habitat availability, and waterbird abundance. The important factor here is that the survey is designed for waterbirds and not specifically game birds. This important distinction needs to be made and considered independently otherwise it can be reasonably argued that the results for all waterbirds should not apply to game birds unless there is specific evidence relating to game birds.

If the survey was designed for the setting of game bird seasons, then FGA would be remiss to not identify that the 2012 waterbird abundance was similar to the 2020 survey. The 2013 and 2014 duck hunting season was implemented as per the legislated season arrangements.

"The EAWS should be considered as a small, but useful, factor in determining duck numbers, but more so habitat availability"

The 2020 survey report makes no comment or recommendations with regards to the setting of game seasons so needs to be used purely as an indicator at a point in time. The survey was conducted in October and November 2020, and published in December 2020 so therefore does not cover any abundance activities following its completion.

The EAWS 2020 indicates that the waterbird abundance median is within expectations of a 'typical' year. This result coupled with the average to above-average rainfall experienced for the last 12 months in the eastern half of Australia further supports the implementation of an unmodified legislated season in Victoria in 2021.

Eastern Australian Waterbird Survey 2020

EAWS identified the highest number of Black Duck since 2001 except for the 2011 post-flooding La Nina spike, and the highest number of Chestnut teal since 1994. A positive indication of gamebird abundance includes the identification that five of the eight-game bird counts increased since the 2019 survey, and that game bird numbers overall continue to be stable over the past 10 years.

Evidence from FGA members who are constantly monitoring wetlands across Victoria is that a significant breeding event is currently underway. This event will continue well into 2021 which needs to be considered as to abundance numbers for the forth coming season.

Accepting the La Nina predictions as articulated by the Bureau of Meteorology indicates these conditions will only accelerate the breeding event as was evident from the 2010 and 2016 La Nina events. The La Nina predictions for Victoria in January to March 2021, which have been witnessed in north eastern Australia will also influence overall hunting conditions and need to be taken into consideration.

The GMA should not rely solely on the abundance numbers reported within the EAWS as it can be reasonably assumed that the figures stated do not truly reflect the actual abundance of game birds and does not consider the current and predicted significant breeding event and rainfall.



Harvest Impact

Duck hunting with firearms has existed in Victoria since the arrival of the first settlers, and prior to settlement among the indigenous Australians using traditional hunting methods. Duck populations have survived commercial unregulated harvesting, recreational hunting where hunter numbers were more than 100,000 licence holders, extreme drought conditions, wetland draining, and urban encroachment. The populations continue to survive in a pattern of peaks and troughs in response to climatic conditions. As duck populations are variable and continue to breed at rates greater than harvest rates there is currently no scientific evidence that duck hunting in Victoria is not sustainable under properly managed season arrangements.

The unsubstantiated comments by those that come from an ideological viewpoint are that hunting has a significant impact on duck population numbers. This rhetoric is just that and there is no scientific evidence to substantiate those claims. In fact, in 2000 Professor Richard Kingsford, Grahame Webb, and Peter Fullagar published in a scientific panel review for New South Wales National Parks & Wildlife Service in which it was stated that, 'all scientific studies available to this panel indicate that hunting has no effect on waterfowl populations'. To FGA's knowledge, this statement remains true and no further studies have been undertaken which contradict this statement.

When hunting seasons and bag limits are modified the major impact is to hunter participation and economic benefit. Low bag limits disincentivise hunters to travel long distances across regional Victoria where they would normally contribute to the local economy through purchases in food, fuel, accommodation, and equipment. It is accepted that the 2020 bushfires and COVID-19 pandemic have significantly impacted the regional and rural economy that is reliant on visitor spend and social connections in their communities.

CLIMATE

Climate is also a critical condition that needs to be factored into the GMA's considerations. Reviewing the information supplied by the GMA which in turn relies on the Bureau of Meteorology (BOM) data, it concedes that since December 2019 most of Australia has experienced average to below-average rainfall. Contrary to this Professor Kingsford in his Aerial Survey Report 2020, states that 'Average to above-average rainfall in most of eastern Australia from January 2020 to April 2020 has enabled partial recovery of some of the rainfall deficiencies.'

Australia is known as a land of droughts and flooding rains. Our native water birds have adapted to these conditions over millennia. They continue to survive, although sometimes flourishing and then diminishing in numbers according to the varying conditions on the driest inhabited continent on earth.

The GMA considerations for the 2021 duck season document appears to rely on Victorian water storage levels but fails to consider the vast number of saline wetlands, wastewater treatment plants and the hundreds of thousands of other water storage dams located on farms or lifestyle properties.

"The GMA needs to factor in these other water storage facilities rather than just rely on the large water storage levels."

As a comparison, New South Wales Department of Primary Industries (NSW DPI) mapped the 47,000+ dams and waterways of the NSW-Riverina district (just north of the Victorian border), and surveys in May and July 2020 estimated that these waterways held 463,196 ducks a slight increase from the 2019 survey.

The GMA needs to factor in similar other water storage facilities in Victoria rather than just rely on the large water storage levels. Victoria's dams have a total storage capacity of 13,400,00 ML. Information provided by the GMA, reports that the storage systems within the Murray-Darling Basin have increased by 22.4% compared to the previous 12 months. Further consideration needs to be applied to the 85,000 km of waterways and 23,000 natural wetlands in Victoria which provide habitat for waterfowl and which the GMA has not articulated in its considerations.

Improving Habitat Availability

The Victorian Government must fund active projects to increase/restore native habitat for waterfowl and FGA are committed to work with the relevant authorities to ensure there is a cost-benefit from investment. FGA has been proactive in conserving habitat over the past 60 years and remains committed to further improvement.

Many wetlands in Southern Australia only exist today because of the value hunter/conservationists have placed on waterfowl habitat. With a strong desire to conserve productive habitats for all native waterbirds for the enjoyment of all Australians, continued motivation will rely on the ability to harvest a small portion of the population, ethically and sustainably into the future.

Sustaining the continued privilege of duck hunting into the future provides an opportunity for an active increase in voluntary conservation work around wetlands in line with FGA's Strategic Plan 2030. This includes the many privately owned wetlands, water storages, and various breeding habitats which are managed by hunter/conservationists and landholders alike.

Good examples can be found within the South West, Geelong region, and Gippsland lakes, where active hunter contribution to an FGA nesting box program has delivered the highest populations of Chestnut Teal in Australia as seen in the EAWS. Without FGA's ongoing commitment to habitat improvement, native waterbirds would be more vulnerable than they currently are. Agricultural practices and property development pose a larger threat to gamebirds than does the pressure of sustainable and ethical hunting practices.



Habitat Availability

To deliver increased habitat availability and restore native habitat the primary resource required is water. The Victorian Environmental Water Holder (VEWH) long term average allocation is 645,500ML. An Allocation Bank Account (ABA) needs to be established from the provisions maintained by the VEWH which make a specific allocation for environmental water to be used to restore wetlands for greater duck habitat which in turn will increase habitat for many other species. In particular, a focus on watering shallow wetlands during the spring breeding season and encouraging native vegetation in these wetlands will improve habit for ducks such as Blue Winged Shoveler and Grey Teal along with other wading and migratory birds.

The Minister for Water can allocate environmental entitlements under Section 48(b) of the Water Act 1989. In allocating an environmental entitlement, the Minister for Water must follow the administrative procedure set out in the Water Act 1989. Environment entitlements were included in the Water Act 1989 via the Water (Resource Management) Act 2005. This creates the legal foundation for water to be set aside to maintain the environmental values of rivers and streams. The objective of the environment water reserve is to preserve the environmental values and health of water ecosystems, including their biodiversity, ecological functioning, and quality of water and other uses that depend on environmental condition.

Environment entitlements that form part of the environmental water reserve enable active management of water to meet specific environmental needs such as fish spawning triggers or maintaining critical habitat during drought. The environmental entitlements form part of the environment water reserve. It is our position is that wetlands are intrinsic to the reserve and thus entitled to an allocation from the bulk entitlement.



Habitat Availability

Restrictions on the duck hunting season and harvest imposed by the Minister(s) in recent years imply some concern by the Victorian Government about population status, abundance, and breeding success of a range of game duck species in Victoria. However, to our knowledge, there are presently no game-duck specific management targets included in the wetland watering plans of Victorian Catchment Management Agencies (CMAs), or in the management targets of The Living Murray icon site wetlands managed by Victorian CMAs. Other wetland bird species, such as colonial nesting waterbirds, are specifically targeted with watering events, yet not so for Grey teal, Chestnut teal, Pacific Black duck, Hardhead, Mountain duck, or Australasian Shoveler. Wetland management targets must specifically include measurable outcomes for improving habitats, breeding success, and survival rates of these valued game duck species.

In the last twelve months, nature has provided excellent pasture growth across NSW, Victoria, and South Australia that has shown considerable improvement from 2019, with average to extremely high growth, providing improved habitat availability. Heavy rain has fallen across Victoria, NSW, and Qld in December 2020 and January 2021 to bolster an already promising year.

Game Duck Productivity

FGA Waterfowl Identification Test (WIT) qualified volunteers, as well as other recognised stakeholders, have observed significant and ongoing breeding post the EAWS, with the positive impacts of La Nina already being a factor in Queensland (QLD) and parts of South-Eastern Australia. This will likely extend wetland habitat further south when the latest BOM modelling comes to fruition. As would be expected with an aerial survey, the EAWS observations of bird numbers are inconsistent with ground counts. NSW DPI's Riverina counts and observations by WIT qualified volunteers recorded significant breeding activity in South-West Victoria, along the Murray River, and in the Goulburn region.

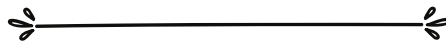
FGA branch volunteers have gathered date-stamped photographic and video evidence, which substantiates that breeding is still occurring in many regions of Victoria and NSW late into December with many nesting sites producing multiple clutches.

Conclusion

Field & Game Australia welcome the invitation from the GMA to provide a written submission. The recommendations and information in this submission have been provided with consideration of all data available to FGA at the time of writing.

FGA's position is that we support a legislated game bird season in 2021 as prescribed in the Wildlife (Game) Regulations 2012.

Field & Game Australia are available to the GMA and government to provide further information on or discuss the submission, and as always to seek opportunities to work collaboratively for the benefit of a sustainable hunting future.



References

- Wildlife (Game) Regulations 2012 – Victorian Government
- Sustainable Hunting Action Plan 2016-2020 – DEDJTR – December 2016
- Sustainable Hunting Action Plan - Implementation Guide – DEDJTR – December 2016
- Wildlife (Game) Regulations 2012 – Victorian Government
- Wildlife Act 1974 – Victorian Government
- Development of an adaptive harvest model (AHM) for Victorian waterfowl – Australasian
- Wildlife Management Society Annual Conference 2020 – Jordan Hampton, Simon Toop, David Ramsey - GMA
- FACT SHEET HUNTING, Delivering for all Victorians, ALP 2018
- Scientific Panel Review of Open Seasons for Waterfowl in New South Wales 2000 (Kingsford, Webb, Fullagar)
- <https://www.water.vic.gov.au/managing-dams-and-water-emergencies/dams> - Department of Environment Land Water and Planning
- 2020-2021 Annual Waterfowl Quota Report to the Game Licensing Unit, NSW Department Primary Industries

Review information provided to the panel:

- 2020-21 Annual Waterfowl Quota Report to the Game Licensing Unit, New South WalesB Department of Primary Industries
- Assessment of Waterfowl Abundance and Wetland Condition in South Eastern Australia, SouthB Australian Department of Environment and Water
- Victorian Summer waterbird count 2020 – Arthur Rylah Institute for Environmental ResearchB
- FGA Summer waterfowl count, and November 2020 waterfowl counts
- Aerial Survey of Wetland Birds in Eastern Australia – October 2020 Annual Report SummaryB
- Game Management Authority Considerations of the 2021 duck season
- Australian Government Bureau of Meteorology - Rainfall
- Assessment of the status of the Australasian (blue-winged) shoveler (*Anas rhynchos*) in south-eastern Australia
- Design of a Monitoring Program for Game Ducks in Victoria. D.S.L Ramsey – June 2020 (ArthurB Rylah Institute for Environmental Research Technical Report Series No. 314

Information not provided to the panel due to it being supplied late by the GMA:

- Estimates of duck and Stubble Quail harvests in Victoria for 2020 – Results from surveys of Victorian Game Licence holders in 2020 – P.D Moloney, J.O Hampton

