RSPCA Victoria

Duck hunting season 2022

RSPCA Victoria submission

06.01.2022

About RSPCA Victoria

RSPCA Victoria is a non-government, community-based charity that works to prevent cruelty to animals by actively promoting their care and protection. Since its establishment in 1871, and as member of RSPCA Australia (the federation of eight state and territory organisations in Australia), the RSPCA has collectively become Australia's leading animal welfare charity.

Across the state, RSPCA Victoria's community services include work undertaken by our Inspectorate, Animal Care Centres, Veterinary Clinics and Education teams. RSPCA Victoria operates Animal Care Centres across Victoria, providing refuge, care and new homes where possible to more than 20,000 animals every year. Our team of Inspectors works to protect animals from cruelty, receiving more than 10,000 reports every year, prosecuting offenders and rescuing animals from dangerous situations. Our Education team contributes to prevention strategies by influencing over 9000 young people each year about the value and importance of animals in our lives.

RSPCA Victoria provides the community with education and support regarding animal welfare and works with government and industry to ensure the standard of animal welfare and care continues to improve.

RSPCA policies are a collection of statements developed to improve the welfare of animals in Australia. These policies are underpinned by scientific evidence and must be agreed upon and amended by a unanimous vote from the RSPCA National Board, following a robust consultation process with each state and territory RSPCA.

Contents

RSPCA VICTORIA RECOMMENDATIONS 3

INTRODUCTION 3

NATIONAL RSPCA POLICY 3

DUCK WELFARE 4

WOUNDING 4

DISTURBANCE FROM HUNTERS 6

CLIMATE OUTLOOK 7

GAME BIRD ABUNDANCE 8

VICTORIANS' ATTITUDES TOWARDS DUCKS 11

RSPCA Victoria recommendations:

1. RSPCA Victoria strongly recommends cancelling the 2022 duck hunting season due to the inevitable suffering of native ducks.
2. Acknowledging that duck hunting is currently lawful, if it is to continue, RSPCA Victoria has the following recommendations to reduce the negative welfare impacts for ducks and off-target species:
    - Monitor the wounding rates of ducks in Victoria.
    - Improve hunter education on issues such as humanely dispatching downed ducks.
    - Implement interventions to reduce the wounding rate:
        a. Regulate a maximum shooting distance.
        b. Make the Shotgunning Education Program mandatory.
        c. Introduce an annual and mandatory Waterfowl Identification Test.
3. Due to the inevitable welfare impacts caused by hunter disturbance of native waterbirds, it is strongly recommended that the 2022 duck hunting season is cancelled.
4. As climate outlook data and predicted rainfall are very unlikely to relieve long-term deficits and subsequent habitat conditions, the 2022 duck hunting season should be cancelled.
5. As long-term declines in game bird species abundance have not recovered with increased habitat, it is recommended that the 2022 duck hunting season should be cancelled.
6. Due to community concern for the welfare of native ducks and Victorians indicating they would avoid holiday locations where duck hunting occurs, a 2022 duck hunting season would not be consistent with community attitudes and therefore should be cancelled.

Introduction

RSPCA Victoria appreciates the opportunity to provide a submission to the Game Management Authority (GMA) regarding our suggestions for modifications to the 2022 duck hunting season. In this submission we will outline the reasons we believe the 2022 season should be cancelled.

National RSPCA policy

RSPCA Australia is opposed to the hunting of any animal for sport as it causes unnecessary injury, pain, suffering, distress or death to the animals involved.

RSPCA Australia is opposed to open seasons on duck, quail, deer and other 'game' species, and to the breeding and release of animals into 'game parks' for the purpose of hunting for sport.

Duck welfare

Wounding

RSPCA Victoria has long expressed concern that there is no information on the wounding rate of ducks during the Victorian hunting season. It is indisputable that duck hunting using a shotgun results in a substantial number of ducks being wounded, with some individuals surviving, while others will suffer before eventually dying. Some surveys of waterbird wounding losses have been undertaken in Australia; however, these studies were conducted from the 1950s to the 1980s and no recent studies have been performed. Until evidence to the contrary is provided, based on the Australian studies, approximately 12% of birds will be wounded and survive, and approximately 14% will be maimed or crippled, but this rate could be as high as 33%.[1] Therefore, approximately 26% to 45% of birds shot will be wounded, maimed or crippled. This wounding rate is unacceptably high and whilst duck hunting remains lawful, must be reduced as a matter of urgency. The likely outcome for wounded, maimed or crippled birds is a slow and painful death.

Using the wounding rates of 26% to 45% and comparing this to the reported total harvest figure of 238,666 ducks from the 2019 season (as the 2020 and 2021 seasons were impacted by COVID-19), this would mean that between 62,053 and 107,400 ducks were wounded and not killed outright in the 2019 season. Although the 2021 duck season was severely limited, using the same wounding rates and comparing this to the reported total harvest figure of 52,500 ducks from the 2021 season, this would mean that between 13,650 to 23,625 ducks were wounded and not killed outright. These are unacceptably high numbers of wounded and suffering native ducks, and along with the fear and distress experienced as part of the hunting process, these are the main factors underpinning our strong recommendation for the 2022 Victorian duck hunting season to be cancelled.

Gunshot wounding reduction can be achieved as evidenced in a study that compared crippling rates in pink-footed geese in Denmark.[2] The study found a declining trend from 36% to 20% of crippled birds, which was a successful decrease of 44% in crippling rates. This result was due to the initiation of a comprehensive interventions program including wounding awareness campaigns, hunter training in distance assessment, training under realistic conditions, stricter requirements for the hunting test and adjustment of hunting techniques to promote shooting at shorter distances, resulting in safer and more accurate shots and therefore better chances of shooting birds without wounding.[3]

---

[1] F.I. Norman & D.G.M. Powell, 'Rates of recovery of bands, harvest patterns and estimates for black duck, chestnut teal, grey teal and mountain duck shot during Victorian open seasons, 1953-77', *Australian Wildlife Research*, 8 (1981), 659–664.

[2] K. Clausen et al., 'Crippling ration: A novel approach to assess hunting-induced wounding of wild animals', *Ecological Indicators*, 80 (2017), 242–246.

[3] J. Madsen & L. Haugaard, 'Shooting of the short-billed goose - update 2016 Memorandum', *Danish Centre for Environment and Energy - Department of Bioscience*, (9 May 2016).

While the GMA initiated the Wounding Reduction Working Group in 2021 to devise practical solutions to address wounding, it will be necessary to monitor wounding rates of ducks to evaluate any interventions. However, as Victoria has not implemented any interventions to reduce wounding rates ahead of the 2022 duck hunting season, the wounding rate of ducks is likely to remain very high. Therefore, if the Victorian duck hunting season proceeds without any mitigations in place to decrease preventable wounding, it is likely a high wounding rate of between 26% to 45% will continue.

To assist in reducing the negative welfare impacts for ducks and off-target species, RSPCA Victoria believes that improving hunter education is of vital importance. The RSPCA is opposed to the unnecessary injury, pain, suffering, distress and death experienced by ducks during hunting. Whilst hunting is still lawful, it is critical to increase hunters' knowledge, particularly on how to humanely dispatch downed ducks, of with only 13% of hunters knowing how to correctly perform this important skill.[4] Regulation of the maximum shooting distance, as shooting at shorter distances increases chances of shooting birds without wounding, is another intervention that should be put in place to reduce wounding. We continue to have concerns that the Shotgunning Education Program (SEP) is voluntary and that there is a cost to participate, which can be a barrier for some hunters. In addition, we are equally concerned that the Waterfowl Identification Test (WIT) only needs to be taken as a once off. While duck hunting continues to be legal in Victoria, at a minimum the SEP should be made mandatory and regular WITs should be undertaken to reduce the risk of shooters killing incorrect species including those that are vulnerable.

RSPCA Victoria recommendations:

1. RSPCA Victoria strongly recommends cancelling the 2022 duck hunting season due to the inevitable suffering of native ducks.

2. Acknowledging that duck hunting is currently lawful, if it is to continue, RSPCA Victoria makes the following recommendations to reduce the negative welfare impacts for ducks and off-target species:

    - Monitor the wounding rates of ducks in Victoria.
    - Improve hunter education on issues such as humanely dispatching downed ducks.
    - Implement interventions to reduce the wounding rate:
        a. Regulate a maximum shooting distance.
        b. Make the Shotgunning Education Program mandatory.
        c. Introduce an annual and mandatory Waterfowl Identification Test.

[4] Game Management Authority, 'Summary report of hunters' knowledge survey findings December 2020', *Game Management Authority, Victoria*, Dec. (2020).

Disturbance from hunters

In addition to the direct welfare issues from gunshot wounding, a recent study found duck hunting could also indirectly affect the health and survival of bird species through increased energetic requirements in response to recreational hunter disturbance.[5] When additional energy is spent due to hunter disturbance, an increase in food intake is required to recoup the difference in energy. Given the correlating extra time required for supplementary feeding, these factors may carry a survival cost.[6] This survival cost is due to increased predation risk as well as the possible inability to attain and store enough nutrients for migration, which can affect both individual survival and fecundity probabilities.[7] This is particularly critical for waterbirds that may need to fly for great distances, such as the Grey Teal which has been shown to fly over 2000 km in a year.[8]

Disturbance from hunters causes welfare issues through fear and distress responses in ducks resulting in increased flight times. Flight is more energetically expensive than other forms of locomotion and in the recent study flight increases were measured (e.g. via distance or time flying) due to disturbance from hunters. Gun shots on opening day held the highest disturbance levels during which ducks doubled their time flying (4%–7.9%) and distances moved increased by 30% compared with pre-season tracking. When hunters were moving about the landscape in boats or on foot during the hunting season, ducks tripled their flying distance during the nocturnal period (0.6–1.9%) and flight duration more than doubled. Combined, these results indicate that both lethal direct and non-lethal indirect hunter activities, all known to disturb ducks, were the predominant causes of observed movement variations across the hunting season.

Hunters also force ducks to decrease their foraging behaviours, which can lead to compromised animal welfare including poor body condition. This has been shown to cause a decrease in survival rates for migratory birds.[9] There was an increase in crepuscular (twilight) and nocturnal activities during the hunting period studied, as well as a decrease in time periods of nocturnal foraging. The ability for waterbirds to acquire adequate food resources to maintain healthy body condition could be impacted due to the constraint in foraging time, and combined with greater overall flight it may reduce their overall welfare and likelihood of survival.

The indirect effects on duck welfare from recreational hunter disturbance need to be recognised. This negative impact on native bird species due to recreational hunting is also why we recommend that the 2022 Victorian duck hunting season should be cancelled.

[5] F. McDuie et al., 'Informing wetland management with waterfowl movement and sanctuary use responses to human-induced disturbance', *Journal of Environmental Management*, 297 (2021).
[6] J. Madsen & A.D. Fox, 'Impacts of hunting disturbance on waterbirds-a review', *Wildlife biology*, 1/1 (1995), 193–207.
[7] J. Madsen & A.D. Fox, 'Impacts of hunting disturbance on waterbirds - a review', 193–207.
[8] D.A. Roshier, N.I. Klomp & M. Asmus, 'Movements of a nomadic waterfowl, Grey Teal Anas gracilis, across inland Australia–results from satellite telemetry spanning fifteen months,' *Ardea*, 94/3 (2006), 461–475.
[9] J. Madsen & A.D. Fox, 'Impacts of hunting disturbance on waterbirds - a review', 200.

RSPCA Victoria recommendation:

Due to the inevitable welfare impacts caused by hunter disturbance of native waterbirds, it is strongly recommended that the 2022 duck hunting season is cancelled.

Climate outlook

Current climatic conditions as well as the forecasted conditions from January to March 2022, will not support sustainable hunting. Although climate outlooks indicate some areas of Australia are likely to experience above or below median rainfall, Victoria has roughly equal chances of above or below median rainfall.[10] While recent excess rain due to La Niña has increased rainfall totals, it has not completely accounted for below average rainfall between April 2020 and November 2021.[11] Many areas previously experiencing serious rainfall deficiency are still below average, and in some areas of Queensland and Tasmania the rainfall levels remain more than 200 mm less than average for the 20-month period. Multi-year rainfall deficiencies, which originated during the 2017 to 2019 drought, remain over large parts of the country including across the Victorian, South Australian and New South Wales borders. Despite some lessening following La Niña rainfalls, the accumulated rainfall anomalies remain very large for some areas of Australia.[12]

Although rainfall has been above average across most of Australia, apart from a few areas which has had below average rainfall including the border of South Australia and Victoria, it has not been sufficient to replenish all habitats to support sustainable waterbird populations. While major water storage levels in the Murray-Darling Basin have witnessed some recovery in 2021 due to La Niña rainfalls and the positive Southern Annular Mode, some water storages remain low, such as in South East Queensland which only increased from 36.5% capacity in February 2021 to 39.7% by the end of November 2021.[13] In addition, often impoundments and storages can trap water and prevent it from entering creeks, streams and wetlands, thereby reducing available habitat.[14] Therefore, although there has been an increase in water storage levels, this is not sufficient to promote sustainable waterbird populations.

[10] Australian Government Bureau of Meteorology, 'Climate Outlooks', *Australian Government Bureau of Meteorology* (30 Dec. 2021), Overview, Rainfall & Temperature, http://www.bom.gov.au/climate/outlooks/#/overview/summary, accessed 04 Jan. 2022.

[11] Australian Government Bureau of Meteorology, 'Drought Statement', *Australian Government Bureau of Meteorology* (6 Dec. 2021), Rainfall deficiencies and water availability, http://www.bom.gov.au/climate/drought/, accessed 09 Dec. 2021.

[12] Australian Government Bureau of Meteorology, 'Drought Statement', accessed 09 Dec. 2021.

[13] Australian Government Bureau of Meteorology, 'Tracking Australia's climate and water resources through 2021', *Australian Government Bureau of Meteorology* (10 Dec. 2021), Climate updates, http://www.bom.gov.au/climate/updates/articles/a040.shtml, accessed 13 Dec. 2021.

[14] Game Management Authority, 'Considerations for the 2022 duck season', *Game Management Authority* (17 Dec. 2021).

RSPCA Victoria recommendation:

As climate outlook data and predicted rainfall are very unlikely to relieve long-term deficits and subsequent habitat conditions, the 2022 duck hunting season should be cancelled.

Game bird abundance

RSPCA Victoria continues to be concerned by the data provided in the Aerial Survey of Waterbirds in Eastern Australia each year, which demonstrates the dire conditions that wetland birds are facing. Specifically, from the Aerial Survey of Waterbirds 2021 report,[15] we are concerned to note:

- Four major indices for waterbirds (total abundance, breeding index, number of species breeding and wetland area index) continue to show significant declines since 1983. If 1983 and 1984 peak years are omitted, then three of the four major indices still show significant decline.
- Total waterbird abundance in 2021 has decreased by 41% from 2020 and decreased by 54% from 2019. It currently remains well below average and is the third lowest in 39 years.
- All game species abundances were well below long-term averages, in some cases by an order of magnitude, with six out of eight game species showing significant long-term declines. In particular, the abundance of Grey Teal, Australasian Shoveler and Australian Wood Duck have continued to decline since the years prior. The Pacific Black Duck, Chestnut Teal, Hardhead and Pink-eared Duck abundances have declined since 2020.
- Species functional response groups (feeding guilds) all showed significant long-term declines, with the rate for ducks being the third lowest in 39 years.
- Total breeding index (nests and broods) did increase from the previous year but is still well below the long-term average.
- Breeding species' richness did increase but is still below the long-term average and the ninth lowest on record. Ibis comprised 83% of the total.
- Only two wetlands supported more than 5,000 waterbirds and represented 13% of the total abundance. More than 48% of surveyed wetlands supported no waterbirds (includes wetlands that were dry). Multi-year rainfall deficiencies, which originated during the 2017 to 2019 drought, still remain over some parts of the study area due to the extremely low accumulated rainfall totals experienced over this extended period.

[15] J.L. Porter et al., 'Aerial Survey of Waterbirds in Eastern Australia – October 2021 Annual Summary Report', *University of New South Wales, Sydney* (2021).

- Some parts of Australia are still affected by drought, with the most recent drought mapping available showing that around 65% of Queensland was in drought or drought affected.
- Wetland area index increased slightly from the previous year, but remains well below the long-term average.
- Waterbird indices across river basins had not yet responded to recent rainfall and flooding and generally reflected low levels of available habitat and drought intensity in the preceding four years.
- Out of the six game species that are showing significant long-term declines, five of these species together made up 98% of game species harvested in 2021;[16] the Pacific Black Duck, Australasian Shoveler (banned in 2021 from being harvested), Chestnut Teal, Grey Teal, Mountain Duck and Australian Wood Duck all show long-term declines in their abundance.

We are very concerned to note that while there has been an increase in available habitat (i.e. in the Murray-Darling Basin) we have continued to see a decline in game duck abundance. As outlined in the GMA considerations document,[17] habitat availability and game duck abundance have a positive relationship, however the Aerial Survey of Waterbirds in Eastern Australia results show this has not been the case. Two out of the three survey bands that held the majority of waterbird habitat were also bands that were in the lowest three for number of waterbirds. This potential change in relationship could be due the extended history of dry conditions and unprecedented damage from the 2019/20 bushfires. It could also be an indicator of the beginning of a crisis in native duck populations. Until this is properly understood, we recommend that a 2022 duck hunting season should not proceed as this is likely to increase pressure on a population that at this stage seems unable to rebound even with improving habitat.

The 2021 Victorian Duck Season Priority Waterbird Count (DSPWC)[18] indicates that there is a low number of habitable wetlands for waterbirds in Victoria. 44% of priority wetlands (66 locations) were found to be dry and unhabitable for waterbirds. 98% of priority wetlands were assessed, which was a significant increase from previous years, for example only 39% of wetlands were assessed in 2020. Due to the large proportion of assessed priority locations in 2021, the data would seem to be a good indicator of the current state of waterbird habitats and populations within Victoria.

[16] Game Management Authority, 'Considerations for the 2022 duck season'.

[17] Game Management Authority, 'Considerations for the 2022 duck season'.

[18] P. Menkhorst & K. Stamation, 'Victorian Duck Season Priority Waterbird Count, 2021', *Arthur Rylah Institute for Environmental Research, Department of Environment, Land, Water and Planning, Heidelberg* (Aug. 2021), https://www.gma.vic.gov.au/__data/assets/pdf_file/0011/803459/DSPWC-2021-report.pdf, accessed 24 Nov. 2021.

The most recent DSPWC that counted a similar number of priority wetlands was in 2018, of which 53 priority wetlands were found to be dry,[19] which equates to a 25% increase of dry and inhabitable waterbird locations. The number of game duck species counted in comparison between 2018 and 2021 has decreased dramatically by 83%, even with an increased number of counting days in 2021. This data indicates that the native duck population has suffered a large decrease in population numbers as well as a decrease in suitable habitat. Sufficient time is required for waterbird species to recover their numbers effectively.

The Abundance Estimates for Game Ducks in Victoria 2021 survey preliminary results[20] found 84 waterbodies to be dry and the total number of waterbodies with surface water in 2021 was lower than estimated for the previous survey in 2020. This is despite the 2021 survey being undertaken between October and November, which included one of the highest daily record-breaking days of rainfall in November 2021,[21] as well as extra waterbody types being included in the 2021 survey, specifically sewage treatment ponds, rivers and streams, in addition to dams and wetlands. The addition of more waterbody types is noted to be the cause of the estimated higher abundance of game ducks found in 2021, rather than an actual increase in abundance levels since last year. The increase of included waterbody types in the 2021 survey may also account for the increase in total surface water so far stated in the report. The addition of waterbody types in the 2021 survey inevitably results in an inability to compare data to the year prior. We also note the results from the 2021 survey are only preliminary and may be subject to revision in the final report. RSPCA Victoria believes confirmation of the results and further comparable surveys should occur before this data can be taken into consideration to set duck season conditions.

If a 2022 duck hunting season is not cancelled, duck populations are at risk of depleting to precarious numbers as duck harvest species statistics are not correlating with species abundance numbers reported. The 2021 duck season harvest estimates[22] show the most commonly harvested game bird species was the Pacific Black Duck (37% of the total harvest) which held only the fourth highest abundance number in both the Aerial Survey of Waterbirds (11%) and Abundance Estimates for Game Ducks survey (15%) and was not in the top three game bird species counted in the DSPWC. The Australian Wood Duck was the next commonly harvested species (27% of the total harvest) and although it was the highest counted species in the Abundance Estimates for Game Ducks (42%), contradictorily it was only 14% of game birds counted in the Aerial Survey of Waterbirds and also not in the top three game bird species counted in the DSPWC.

[19] P. Menkhorst, K. Stamation & G. Brown, 'Victorian Summer Waterbird Count, 2018', *Arthur Rylah Institute for Environmental Research, Department of Environment, Land, Water and Planning, Heidelberg* (Jun. 2018), https://www.gma.vic.gov.au/__data/assets/pdf_file/0005/481334/2018-Summer-Waterbird-Count-report.pdf, accessed 25 Nov. 2021.

[20] D. Ramsey & B. Fanson, 'Preliminary results from the 2021 survey of game ducks in Victoria', *Arthur Rylah Institute for Environmental Research, Department of Environment, Land, Water and Planning, Heidelberg* (Dec. 2021).

[21] Australian Government Bureau of Meteorology, 'Victoria in November 2021', *Australian Government Bureau of Meteorology* (3 Dec. 2021), Monthly Climate Summary for Victoria, http://www.bom.gov.au/climate/current/month/vic/summary.shtml, accessed 05 Jan. 2022.

[22] Game Management Authority, 'Considerations for the 2022 duck season'.

Based on the 2021 data in the Aerial Survey of Waterbirds and the Victorian Duck Season Priority Waterbird Count we believe that it is not possible to undertake a sustainable hunting season in 2022.

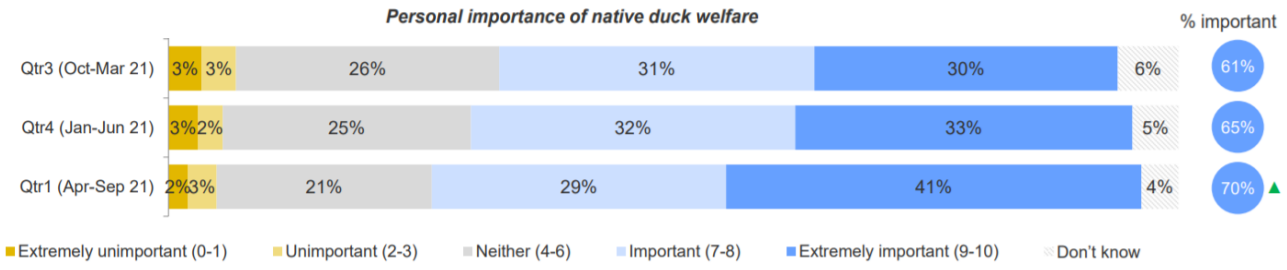
RSPCA Victoria recommendation:

As long-term declines in game bird species abundance have not recovered with increased habitat, it is recommended that the 2022 duck hunting season should be cancelled.

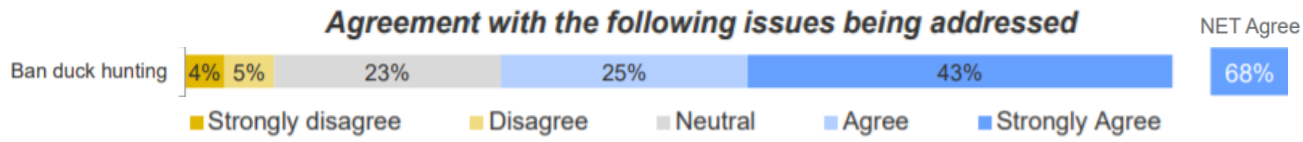
Victorians' attitudes towards ducks

From April to September 2021, RSPCA Victoria engaged market research firm Kantar to undertake a survey and analysis of Victorians' attitudes to duck welfare. This survey was part of a larger RSPCA Victoria brand-tracking survey that is regularly conducted with data collected from a representative sample of 1,837 Victorian respondents. The data has been weighted to ABS statistics to be representative on age, gender and location.

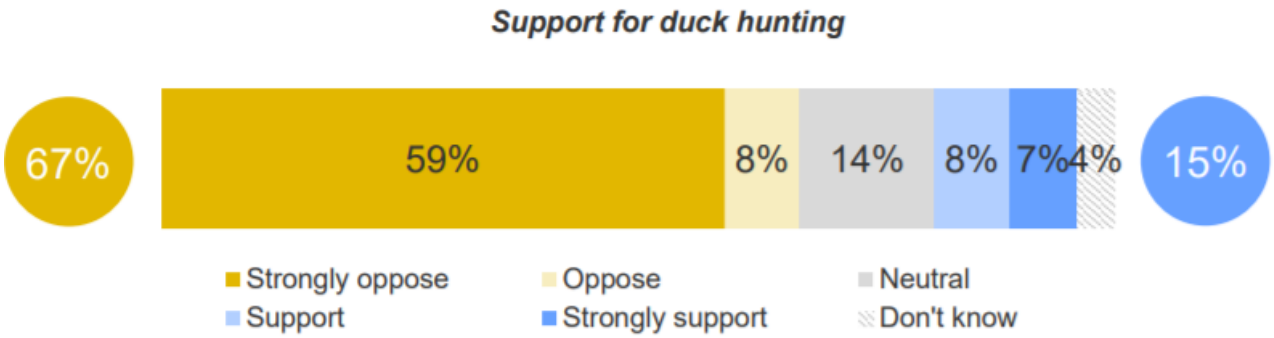
When asked about the perceived importance of native duck welfare, seven in 10 Victorians (70%) indicated that the welfare of native ducks is personally important to them and more than two in five Victorians (41%) suggested that it was *extremely important*, both of which have significantly increased across the last three survey periods.



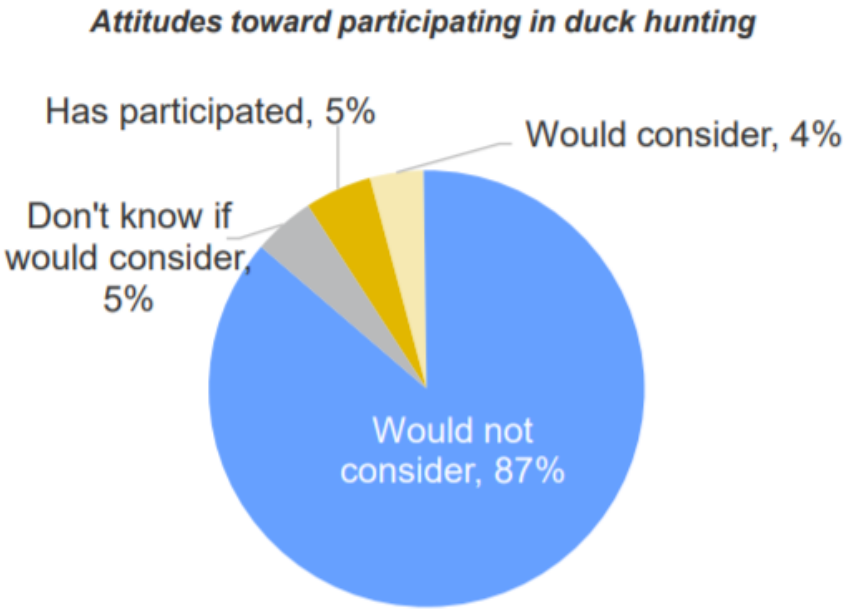
More than two in three Victorians (68%) agree that duck hunting should be banned, whilst more than two in five Victorians (43%) *strongly agree* duck hunting should be banned.



At least two thirds (67%) of Victorians continue to oppose duck hunting, with three in five (59%) indicating their *strong opposition* to the activity and fewer than one in six Victorians (15%) expressing support.

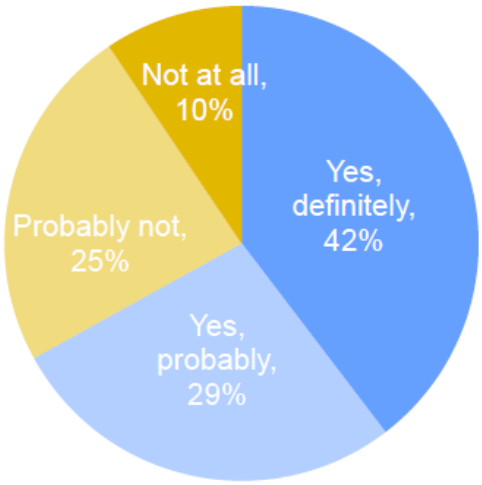


The majority of Victorians surveyed have never participated in duck hunting (95%), and the majority of these people would not consider participating in the future (87%). Among those who have participated in or would consider participating in duck hunting, more than four in five people (78%) would be still open to travelling to regional Victoria if they could not participate in duck hunting.



More than seven in 10 Victorians (71%) suggested that they would avoid choosing a holiday destination where duck hunting occurs, with more than two in five Victorians (42%) indicating they would *definitely* avoid holiday destinations where duck hunting occurs.

Would avoid holiday destinations where duck hunting occurs



RSPCA Victoria recommendation:

Due to community concern for the welfare of native ducks and Victorians indicating they would avoid holiday locations where duck hunting occurs, a 2022 duck hunting season would not be consistent with community attitudes and therefore should be cancelled.

RSPCA Victoria

03 9224 2222

advocating@rspcavic.org.au

3 Burwood Highway Burwood East VIC 3151

rspcavic.org.au

06.01.22