

Submission to Game Management Authority re Native Duck & Quail Shooting 2021

By Regional Victorians Opposed to Duck Shooting Inc, supported by some of our key alliance partners

Regional Victorians Opposed to Duck Shooting Inc (RVOTDS) is calling for the 2021 native duck and quail shooting season to be completely closed based on dire environmental factors, significant long-term decline of all waterbird indices, lack of critical data concerning protected species and a lack of social/economic impact studies.

To allow any kind of shooting season would be completely reckless and cause irreversible damage to vulnerable ecosystems and rural communities.

Introduction

RVOTDS represents those who live and work around regional waterways, adversely impacted by duck shooting. These impacts have never been considered by GMA.

It is extremely concerning neither GMA nor DELWP are able to list, map or even estimate the number of, the thousands of waterways where unmonitored shooting of our native waterbirds is allowed. The adverse impacts of duck shooting to residents, businesses and the growing numbers of the public interested in enjoying public waterways for other more popular activities, have never been quantified by government.

The authorities' lack of knowledge of where the waterways are where duck shooting is allowed, also means there is a lack of monitoring for what bird species may or may not be present and a lack of compliance monitoring. This poses a significant risk not just to the public, but to our dwindling native waterbird populations including threatened species.

Restricted seasons are not a solution. In restricted seasons there are still significant adverse impacts to community and thousands of our dwindling numbers of native waterbirds including threatened species killed and maimed.

There is widespread lack of trust in the regulator (referred to as independent yet whose chair and other key staff only recently relinquished their own duck shooting licenses) for many reasons including that they have not once recommended a season close despite the worst environmental conditions ever recorded, significant long-term decline of all waterbird indices and an almost total lack of understanding of the impact of duck shooting on bird populations including threatened species. Before GMA's time, duck shooting seasons were cancelled in 2003, 2007 and 2008 for less dire circumstances.

If GMA are at all concerned with sustainability, they must cancel the duck *and quail* shooting season.

Why sustainability matters

The value of healthy wildlife and ecosystems cannot be overestimated.

In 2016, the United Nations Environment Programme stated that 75 per cent of all emerging infectious diseases in humans are zoonotic, closely interlinked with the health of ecosystems.

The World Economic Forum's Global Risks Report ranks biodiversity loss and ecosystem collapse as one of the top five threats humanity will face in the next ten years.

Research recently published by the US Davis School of Veterinary Medicine found that wildlife exploitation through hunting, trade, habitat destruction and urbanisation has not only driven species to the brink of extinction but increased the risks of viruses spilling over to humans.

Australia is the worst in the developed world for species extinction and Victoria has the highest number of threatened species by sub region in the country. Most biodiversity indicators in Victoria are poor and trending downwards. Of 35 indicators, 60% are poor. None are good. There is a reason why there is now an Inquiry into Victoria's shocking track record of ecosystem decline.

Australia is blessed with wildlife including waterbirds found nowhere else on the planet. Birdwatching is one of the fastest growing pastimes in the world. Over 860,000 domestic tourists birdwatched last year in our country, with more overnight domestic tourists birdwatching than visiting the Reef.

Our wildlife are assets to be celebrated particularly when tourism contributes more to our economy than agriculture, forestry, fishing, IT, media and communications combined and nature based tourism is the fastest growing component.

Will GMA be responsible for more extinctions and the flow-on impacts to rural communities?

Science tells us Australia's native waterbird numbers have declined 90% just since the 1980's. Worsening effects of climate change will stress them further. *"We're going to see long term declines exacerbated"* (Head of Ecosystem Science, University NSW)

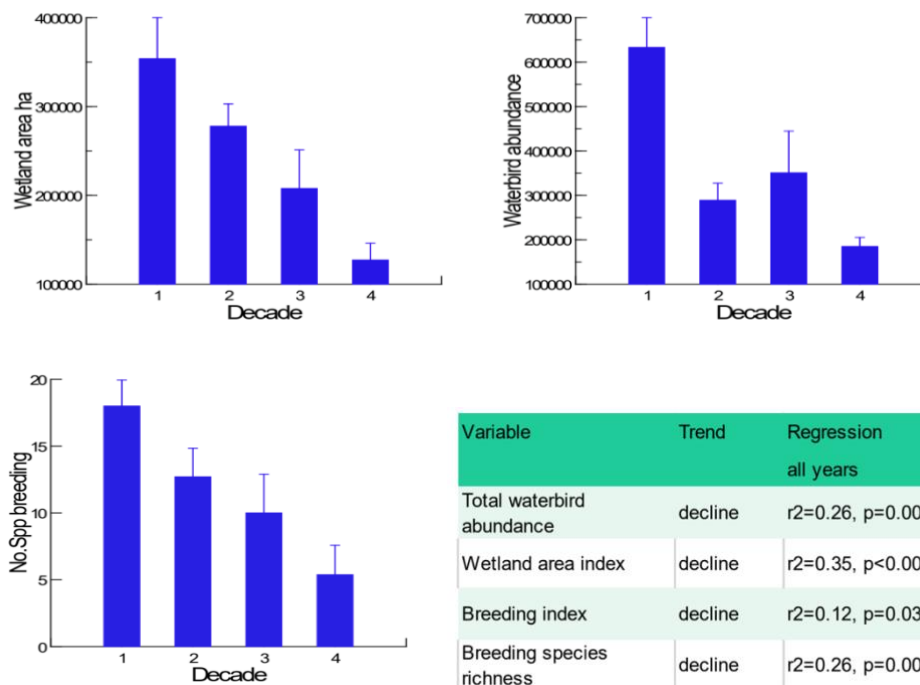
Our waterbirds require urgent protection from hunting.

Ongoing shooting of native waterbirds – an example of Victoria's failing

According to Graeme Ford, CEO of GMA, the East Australian Aerial Waterbird Survey (EAAWS) is one of the most critical pieces of evidence to be considered. The 2020 survey again shows a serious long term decline in all waterbird indices and an urgent need to protect remaining birds and allow them an opportunity to breed at the waterways which still hold water.

"It's well below long-term average with even fewer birds than last year" (Head of Centre for Ecosystem Science, University NSW).

- Waterbird numbers have decreased 23% from the already low numbers of 2019. Over 48% of wetlands surveyed held NO BIRDS.
- While the 2019 wetland area index was the lowest recorded since surveys began, recent rain has only lifted it a small degree, still well below long term averages. Higher temperatures due to global warming are drying remaining wetlands faster.
- Despite rainfall, there has been little breeding recorded and only by swans. This totally contradicts the notion that “rain breeds birds” and requires a serious re-think and recognition that our waterbirds are in trouble. *“With some duck species only living three to five years, an increase in the timing between breeding opportunities could spell their demise. If you don’t get it right and they don’t get a chance to breed in that sort of timeframe, they’re in trouble”* (Professor Kingsford, Head of University NSW’s Centre for Ecosystem Science).



Based on the EAAWS alone, it is very clear GMA must close the shooting season.

“Humane Society International (HSI) Australia is strongly opposed to Victoria’s duck hunting season proceeding in 2021. In addition to welfare concerns for the hundreds of thousands of birds likely to be shot, a 2021 duck hunting season would place additional conservation pressure on struggling populations. HSI notes that the total index of waterbird abundance has decreased by 22% (the sixth lowest in 38 years), with the game duck abundance index displaying similar declines with a 23% decrease resulting in the seventh lowest score in 38 years at just 44% of the long-term average.

Of particular note is that the most relevant Eastern Australia Water Survey (EAWS) bands to Victoria’s duck hunting season (bands 1 and 2) saw declines in abundance for all surveyed species. It is additionally concerning that this across-the-board decrease was despite an increase in available habitat, and HSI urges the precautionary principle to be applied to its full extent while this bucking of the general trend is investigated.

With both the EAWS breeding index for all species combined and breeding species richness decreasing from last year and being well below the long-term average and all major EAWS indices for waterbirds continuing to show significant declines over time, Humane Society International Australia submits that the 2021 Victorian duck hunting season should be cancelled entirely.”

Evan Quartermain – Head of Programs Humane Society International

Further critical factors which support an urgent complete season close include the following:

- Long-term effects of climate change which are predicted to worsen.
- Birds' unique susceptibility to climate change.
- Threat to migratory birds already experiencing significant decline.
- Detrimental impact to bird populations of shooting birds of breeding age.
- Detrimental impact to bird populations of shooting monogamous bird species.
- Adverse impacts of lead which is still used, to people, animals and ecosystems.
- Lack of data regarding game birds and threatened species present on wetlands prior to shooting.
- Lack of data of game birds and protected species shot during duck season. Limited data obtained through FOI shows protected and threatened species are shot in significant numbers.
- Lack of knowledge of where shooting areas are and lack of compliance monitoring.
- Shooters' critical knowledge gaps as proven by recent tests.
- Lack of social/economic impact studies of duck shooting on the wider community.
- Declining economic impacts of duck shooters as denoted by the latest shooter surveys.
- Lack of data regarding the impacts of quail shooting including to the critically endangered Plains Wanderer which quail closely resemble.

The above points are detailed as follows.

1. The **long-term trend of climate change** and its impact on our waterbirds is never mentioned by GMA. The Bureau of Meteorology has warned that our country is heating more rapidly than the global average. Worsening storms and floods, longer droughts, hotter, drier summers are some of the repercussions we are already seeing as a result of a 1°C rise in average temperatures. The bureau says we are headed for an unliveable 4°C rise in the next 80 years. The consequences for our wildlife will be catastrophic.
2. No consideration has been given to the fact that **birds are twice as vulnerable to climate change** as mammals. (*Global Change Biology, Zoological Society of London – report by International scientists group based on 481 species in 987 populations around the world*). With climate change set to only worsen, it is obvious our already struggling bird populations require protection from shooters.
3. No account is given to the **impact of duck shooting to migratory birds** who are in serious decline and particularly vulnerable to climate change and disturbance. Shooting disturbance at Victorian waterways adversely impacts their ability to obtain critical feed and rest prior to their long journeys along the East Asian-Australasian Flyway.

Of the species who use the flyway, 50 are in “catastrophic” decline and Australia is under numerous International obligations to protect them (<https://www.environment.gov.au/biodiversity/migratory-species/migratory-birds>).

4. No consideration has been given to the fact that **healthy birds of breeding age are shot**, further reducing the chances of population recovery.
5. No consideration has been given to the **ripple effect through bird species most of which form life-long pairs. In fact 90% conduct joint parenting.** (As a comparison, only 5% of mammals, including humans, pair up and raise young together.) When one of a pair is shot, it is likely any offspring won't survive and the remaining partner may never recover. The real impact to bird populations therefore of shooting the hundreds of thousands of birds reported as bagged each year in Victoria— even in “restricted” seasons – is far larger than just the “harvest” numbers.
6. No regard has been given to the serious issue of **lead still used** legally in quail shooting and illegally in duck shooting (as reported most years). Lead is extremely toxic to ecosystems, animals and people even in tiny traces (emedicine.medscape.com/article/1174752) It is an insidious poison causing extreme suffering to animals who ingest it, such as dabbling ducks, swans and secondary predators like protected eagles.

It is irresponsible that areas of regional Victoria are allowed to continue to accumulate lead from shooters, endangering people and animals, when terrestrial shooting ranges have been closed due to lead contamination (and over \$250,000 of taxpayers money spent trying to clean up just one: Wangaratta).

7. **Insufficient data regarding birds including protected species present on wetlands prior to shooting.** In previous years (before GMA existed) over 500 wetlands were typically surveyed for the presence of bird species. However neither GMA nor DELWP have been able to list, map or even estimate the number of waterways where unmonitored shooting is allowed, let alone monitor what may be present on them. Pre-shooting checks are now far, far fewer than they used to be.

It is the epitome of irresponsibility to continue to allow shooting in these circumstances and ludicrous to suggest “sustainability” can be ensured with such an obvious and mammoth lack of critical data.



Previous government departments were able to estimate the number of wetlands and waterways available to duck shooters. That number was close to 15,000.

It is unclear why after six years and millions in taxpayer funds, GMA is still only able to list a couple of hundred, posing substantial risk to the public and our birdlife.

"With regard to a possible duck-hunting season in 2021, the Hamilton Field Naturalists Club has a couple of comments to make:

- The GMA has consistently allowed hunting on wetlands at Lake Linlithgow, Lake Bolac and Tower Hill when many hundreds of Blue-billed ducks and scores of Freckled Duck and Shovelers were present– and even a flock of 50 Brolga on Lake Bulrush in one year. They have done that despite the birds having no other sanctuary areas to go to. We regard that as utterly irresponsible and uncaring.*
- There are no safe sanctuaries for waterbirds in SW Victoria – since DELWP and the GMA are unwilling to put any wetlands permanently off-limits then there is absolutely no case for allowing any hunting on the region’s wetlands. Apart from conservation and animal welfare considerations, tourists have no hope of seeing ducks and other waterbirds at close quarters on lakes or swamps while the birds can be shot at there. Birds depart when people approach closer than about 200 m."*

*Dr Rod Bird OAM, Secretary
Hamilton Field Naturalists Club"*

8. Insufficient and unreliable data of birds shot including threatened species.

GMA’s own “Season Considerations” document states *“To effectively manage game species, it is important to accurately quantify the number of animals harvested”*. Yet this is never done.

Despite millions more in taxpayer funds, there is a gross lack of monitoring. Given the vast number of waterways where duck shooting is allowed, even the army would be incapable of such a massive undertaking.

While earlier regulators commonly checked shooters bags at around 60 wetlands – still far too low a number to be able to accurately estimate the impact of shooting at thousands of waterways – GMA have struggled to check a tenth of that number.

The pitiful snippets of information gathered allow for no more than guesses as to the impact of duck shooting on bird populations including threatened species. This is unacceptable particularly in Victoria where ecosystems are so severely stressed there is a Parliamentary Inquiry into it.

Estimates of numbers of birds bagged by shooters are not only based on a survey of a small number of shooters then extrapolated out assuming the entire duck shooter base would be same, but reliant on shooters’ memories and honesty.

Estimates do not include birds shot and left behind including protected species, found most years by the public, some examples below:

- ⇒ Box Flat 2013 *“The bodies of about 760 game ducks and 155 non-game birds were left on the water at the Box Flat flood plains near Boort. The shooting happened on opening weekend of duck season”*. (ABC March 2013)
- ⇒ Lake Toolondo 2016, *“The Andrews government is headed for a showdown in the courts over the illegal shooting of dozens of rare and threatened birds during the opening of duck season. The shooting occurred despite the presence of Victoria police and authorized compliance officers”*. (The Age April 2016)

⇒ Kerang 2017, “The total number of illegally shot freckled ducks now stands at 112. The latest find takes the total number of birds gunned down in the opening weekend shooting spree to 1,247 and this was from just one of Victoria’s wetlands.” (Medianet March 2017)

The shooting of protected species during “duck season” has been occurring for decades.

Sadly since GMA’s inception, there has been little --if any - data collected on this.

However a Freedom of Information Request (FOI) resulted in our obtaining documentation by previous regulators which shows a sample of the protected species killed in duck shooting seasons in Victoria (sample six years to 1993).

In addition, the documentation clearly stated more than once, that partial wetland closures do not protect threatened species like Freckled or Blue-billed Ducks.

Year	Collected by animal welfare	Collected by CNR	Total
1988	152	152	304
1989	273	392	665
1990	374	80	454
1991	435	119	554
1992	250	94	344
1993	813	159	972

Number of protected and threatened species found dead at several Victorian wetlands in duck shooting season each year from 1988 to 1993.

According to the CEO of GMA, the numbers of protected species illegally shot each season are not quantified.

This horrific fact is further confirmed by Arthur Rylah Institute (ARI) who say in regards to the risks or impacts of direct hunting mortality on non-target species “that is a separate question that can only be properly addressed by gathering robust data on the rates of non-target species being killed or injured by hunters. Such data does not exist and would be extremely difficult to gather”.

Little if any effort has been afforded this critical component of ascertaining sustainability of duck shooting.

In their 2017 Hunters Bag Survey Report, ARI state that less than ten wetlands (out of thousands) were checked for wounded / un-retrieved birds. Just at these few, 18 birds were found including nine dead swans and two dead pelicans.

According to their 2018 report, only one wetland was checked for wounded/ un-retrieved birds.

In both the 2017 and 2018 reports, ARI’s number one recommendation was that more wetlands needed to be checked and more data collated to be able to determine the impacts of hunting on waterbird populations.

Yet the number of any such checks for 2019 and 2020 is understood to be zero.

Table 29 Number of specimens of non-game wildlife found dead around waters used for hunting during the 1993 duck open season. The data for birds collected by members of animal welfare organisations are counts made by CNR officers of birds delivered to CNR Heidelberg during the season.

Species	Collected animal welfare	Collected by CNR	Total
Freckled Duck <i>Stictonetta naevosa</i>	229	57	286
Eurasian Coot <i>Fulica atra</i>	242	35	277
Blue-billed Duck <i>Oxyura australis</i>	84	7	91
cormorant species	44	4	48
Black-tailed Native-hen <i>Gallinula ventralis</i>	0	43	43
Black Swan <i>Cygnus atratus</i>	29	14	43
Galah <i>Cacatua roseicapilla</i>	21	11	32
small grebes	19	5	24
Musk Duck <i>Biziura lobata</i>	19	1	20
Great Crested Grebe <i>Podiceps cristatus</i>	14	1	15
Australian Magpie Lark <i>Grallina cyanoleuca</i>	0	13	13
corella species	7	5	12
ibis species	8	3	11
White-faced Heron <i>Ardea novaehollandiae</i>	3	6	9
Red-necked Avocet <i>Recurvirostra novaehollandiae</i>	6	1	7
Yellow-billed Spoonbill <i>Platalea flavipes</i>	0	6	6
migratory waders	1	4	5
Australian Magpie <i>Gymnorhina tibicen</i>	0	4	4
Silver Gull <i>Larus novaehollandiae</i>	4	0	4
tern species	0	3	3
Barn Owl <i>Tyto alba</i>	0	3	3
raven species	3	0	3
Darter <i>Anhinga melanogaster</i>	2	1	3
Dusky Moorhen <i>Gallinula tenebrosa</i>	2	0	2
raptor species	1	1	2
kingfisher species	0	1	1
Noisy Miner <i>Manorina melanocephala</i>	0	1	1
Australian Pelican <i>Pelecanus conspicillatus</i>	0	1	1
Fairy Martin <i>Cecropis ariel</i>	0	1	1
Little Friarbird <i>Philemon citreogularis</i>	0	1	1
Brush-tailed Possum	0	1	1
Total	813	159	972

"In 1993, animal welfare organisations concentrated their efforts at Lake Buloke, but also collected dead wildlife from wetlands near Kerang and Colac. A wide range of dead wildlife were collected, including non-game duck species, waterbirds and Brush-tailed possum. ...Thirty eight dead ducklings were collected; these were not identified as game or non-game".

972 protected species found dead at several Victorian wetlands in duck shooting season in 1993. These included Australia's rarest native duck the Freckled-Duck, thought to be one of the world's rarest, Blue-billed Duck, swans, galahs, musk ducks, magpies and ibis.

A clearer copy can be viewed in the ARI Technical Report No. 135.

Importantly, these tables show only a fraction of the true toll on our protected species which is likely much larger because the vast majority of waterways where duck shooting is allowed, aren't monitored.

It is highly irresponsible of GMA – if they are concerned with sustainability – to continue to allow shooting when such a high number of protected and threatened species are impacted. Allowing shooting to occur in these circumstances is playing Russian roulette with our birdlife, many species threatened and unique to our country.



Birds left behind after duck shooting: including penguin, musk duck and pied cormorant (protected species). Picture Kim Wormald

9. **Serious shooters knowledge gaps.** As shown by GMA's recent knowledge tests:

- Only 42% of hunters of all animal types got a general knowledge question on personal safety correct.
- Only 37% of duck shooters were able to correctly answer a two-part question on wounding.
- Only 20% of duck and quail shooters were able to correctly answer a three-part question on identifying game species.
- Only 13% of duck shooters correctly answered the question on dispatch of downed birds.

These knowledge gaps pose a significant risk to people let alone our struggling bird populations - more reason GMA must insist on a season close.

10. **Lack of cost-benefit analysis or social/economic impact studies on the wider community.**

GMA suggest that duck shooting is of economic benefit to rural communities. This statement is based on a small survey of shooters, answers unverified, which does not take into account the adverse impacts to the wider community and the cost to the State of regulation and compliance.

Even so, the **latest survey summary report by DJPR showed duck shooting expenditure (according to shooters) dropped 46%** and associated jobs fell 31%, down to just 587 state-wide from 2013 to 2019*. Quail shooting expenditure fell 58% and jobs 48% to a mere 202.

Importantly these numbers reflect both direct and claimed flow on effects. The analysts suggest the net economic benefit, accounting for substitutability of activity, could be as low as just \$19 million (according to hunters spend estimates) and 246 jobs from *all hunting for all Victoria*.

*Duck shooters may argue their decreased spending is due to reduced season length. But the reduction in shooting days was only 12%. They may also argue reduced bag limits was a reason but this won't fly either, because in the survey, shooters said the main reason they go hunting is to "be in the outdoors" (not to kill animals.)

The critical question is what it cost Victorians.

A major failing of these hunter economic impact surveys is the omission of costs. The costs to taxpayers of law enforcement and compliance monitoring for example or of the adverse impact to tourism and other activities due to unmonitored shooters killing animals in public areas. Studies show most tourists - and domestic tourism is worth \$80 billion to Australia - avoid areas where shooting occurs.

Consider the impacts of “[coked up shooters](#)” and [campers terrifying nights](#), of over [30 instances of hunting and firearms offences](#) in a single weekend.

The number of tourists to just one area where they shoot with cameras, like Yea Wetlands, is 30,000 and to Winton Wetlands 66,000. And let’s not forget Phillip Island Nature Parks which contributes around \$500 million a year to our state, of this, \$120 million and 800 jobs just to the local government area.

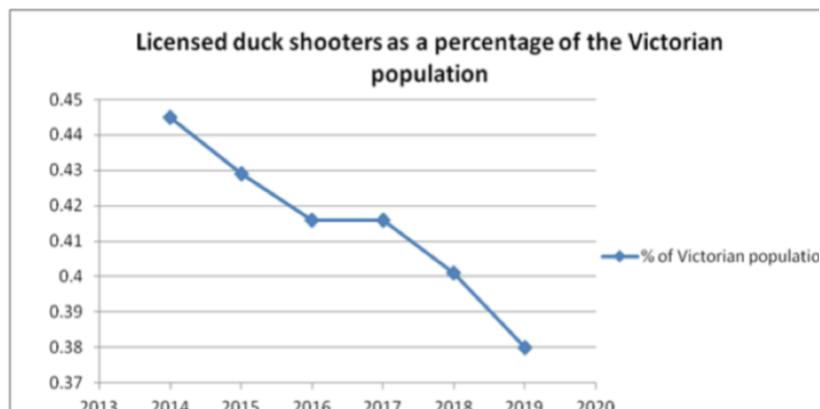
“It is well known in the travel industry that any form of animal hunting is anathema to most travellers and generally countries and regional centres have discovered in recent times that there is more financial benefit from ‘wildlife viewing’ than killing!”

There is a worldwide travel industry movement to train staff in educating clients on ‘Not riding or harming wildlife’ at all and many of these so-called tourist attractions have been or are in the process of shutting down.

Regional centres would see more tourism financial benefit by changing their mindset to promoting wildlife especially as bird watching is becoming more and more popular.”



GMA also incorrectly state duck shooting is “popular”, quoting numbers of game licences issued which is misleading because the population of Victoria has boomed. The accurate measurement is the percentage of the population interested in duck or quail shooting which is tiny (less than half of 1%) and declining. Half this tiny number again are active.



Less than half of one percent of the population are licensed to shoot ducks. Less than half again are active, yet this tiny number significantly negatively impacts the wider community and deters the tens of thousands of tourists such as birdwatchers flocking elsewhere. **Update: The figure for 2020 fell further to 0.35% - so low it is off the scale of this graph.**

Last year, over 21 organisations including leading conservation, environment, regional and animal welfare groups provided statements / submissions calling for a season close. They were ignored.

This year, the number of groups calling for a ceasefire has grown as exemplified in the following list of 44 major business, union, environment and wildlife organisations. Their members and supporters number in the hundreds of thousands. This is in line with the continual professional public polls which show the majority of city and country constituents oppose duck shooting.

As Victorians embrace regional tourism ...

IT'S TIME TO BAN CRUEL DUCK SHOOTING AS OTHER STATES HAVE DONE

Endorsed by 44 business, union, environmental and wildlife groups:

- Australian Conservation Foundation
- Humane Society International
- Australian Education Union Victorian Branch
- Australian Ethical Investment
- BirdLife Australia
- Bush Heritage Australia
- Environment Victoria
- Victorian National Parks Association
- United Firefighters Union of Australia Victorian Branch
- Wildlife Victoria
- Animals Australia
- Environment East Gippsland Inc
- Regional Victorians Opposed to Duck Shooting Inc
- Goulburn Valley Environment Group
- Susan Kerr Travel
- Coalition Against Duck Shooting
- Field Naturalists Club of Victoria
- Castlemaine Field Naturalists Club
- Hamilton Field Naturalists Club
- Peninsula Field Naturalists Club
- Portland Field Naturalists Club Inc
- St Arnaud Field Naturalists Club Inc
- Friends of Mallacoota
- Australian Wildlife Society
- East Trentham Wildlife Shelter
- LUSH Fresh Handmade Cosmetics
- Lawyers for Animals Inc
- Barkers Creek Landcare and Wildlife Group
- Friends of the Earth
- Australian Wildlife Protection Council Inc
- Friends of the Box Ironbark Forests (Mount Alexander Region)
- Nillumbik Environment and Sustainability
- Warrigal Conservation Society
- Carriage in The Bush
- Wildlife Information, Rescue and Education (WIRE)
- Choose Cruelty Free
- Ocean Legal Animals Rights Lawyers
- Animal Active Australia
- Friends of Bats and Bushcare Inc
- Wildlife Carers Group
- Advocating Wild
- Australian Wildlife Assistance Rescue and Education (AWARE)
- Five Freedoms Animal Rescue
- Kangoolool Wildlife Shelter

Even modified shooting seasons kill hundreds of thousands of waterbirds including threatened species

For more information visit
Regional Victorians Opposed
to Duck Shooting Inc
www.regionalvictoriansOTDS.com



Pacific Black Duck photo by Eleanor Dilley

An alliance of 44 business, union, environment and wildlife organisations call for an end to duck shooting in a range of full- and half-page advertisements around Victoria Nov/Dec 2020.

Duck shooting, a declining pastime in which only 7000 participants partake is not “popular”, particularly when continual polls show majority of Victorians – city and country – are opposed.

Birdwatching, one of the fastest growing pastimes in the world in which over 860,000 domestic participants partake, is “popular”.

GMA must cease incorrectly asserting that duck shooting is popular or of economic benefit to regional communities.

11. A word on Quail. Whilst no public consultation takes place regarding the cruel shooting (with lead) of this enigmatic creature, the fact it has been allowed in Victoria is indicative of failings of GMA.

Despite the fires and the fact there is little data concerning the numbers of quail before or after shooting seasons, despite the fact quail closely resemble the critically endangered Plains Wanderer, GMA allowed a full Quail shooting season to take place in Victoria 2020 of 20 birds a day per shooter. And this was hardly monitored.

A freedom of information request confirmed that only 13 compliance patrols were conducted across the entire state for the first three weeks of the twelve-week quail season which is obviously grossly inadequate.

For the pitiful benefit claimed to be associated - which has fallen 58% according to recent surveys (according to shooters) - the harm being done to ecosystems in quail shooting is significant.

Conclusion / Recommendation

Up until now, recommendations to hold duck and quail shooting seasons have been made by GMA based on little if any evidence. We are unfortunately seeing the ramifications of that in ongoing suffering of rural communities, plummeting bird numbers and stressed ecosystems.

If GMA are at all concerned with sustainability, then it's long past time they recommended a season close for duck and quail.

Thank you for the opportunity to make this submission.

Regional Victorians Opposed to Duck Shooting Inc.

Regional Victorians Opposed to Duck Shooting Inc. is a not for profit association which incorporated in April 2018. It now has over 4800 supporters, consisting largely of those who live or work around Victorian duck shooting areas adversely impacted by it. [Click here](#) to see some of what rural people said

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