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Submission for the proposed 2023 recreational duck shooting season

Geelong Duck Rescue

Our organisation was established in 2010 in response to the concerns of local residents and visitors for the welfare of native waterbirds and other wildlife in the Geelong and Western Victoria Region. Whilst Geelong Duck Rescue (GDR) has been in existence only 13 years, individual members have been involved in wildlife rescue and rehabilitation for much longer.

GDR has sought to work with other community groups, authorities, residents, local council, local government,) veterinarians and other wildlife rescue groups to protect and assist wounded wildlife and to monitor for illegal activities including (but not limited to) shooting before and after legal times, shooting protected and non-game species, harvesting above daily bag limits, and cruelty offences.

Members of GDR have a comprehensive knowledge of wetlands and waterways in the Geelong region gained through many hours spent both during, and outside of, the 'season'. The continuity of time spent in one area also allows for a unique comparative perspective on water levels, bird numbers, climatic conditions and shooter behaviour over the years.

We thank you for this opportunity to provide our submission for consideration during discussion of the proposed 2023 recreational duck shooting season.

Introduction

Geelong Duck Rescue does not support the recreational duck shooting season in Victoria (or elsewhere), due to the inherent cruelty of the activity. However, this

submission will not be addressing this point; it will instead focus on considerations for the decision-making process regarding calling a duck season in Victoria for 2023.

We will address the declining bird numbers in our state and across Eastern Australia, the accuracy of the Interim Harvest Model and the reliability of the methodology used for data collection to support decision-making. We will also discuss the impacts of recent floods across Victoria, considerations around climate change and biodiversity and supporting 'one health' policies. Finally, we will consider the ability of authorities to adequately monitor duck shooting across Victoria and the impacts of restricting access to wetlands and waterways across the state on regional communities, who are desperate to welcome back tourism dollars after the COVID-19-restriction years.

We believe it is irresponsible to hold a 2023 recreational duck shooting season in Victoria. It risks the long-term viability of duck populations, increases the risks of biodiversity loss, and has negative impacts on already struggling regional communities. We therefore recommend that the Game Management Authority (GMA) supports a moratorium on the 2023 duck season.

Interim Harvest Model (Klassen/Kingsford)

The Interim Harvest Model (IHM) is a new 'tool' to guide and inform decision making, that claims to be 'a conceptually simple management framework'¹ dealing with a topic that is anything but simple.

In fact, from their own description of the background of the modelling², the Klassen/Kingsford IHM appears to be nothing more than a political tool to cater to the desires of shooters, and to make the calling of a duck season (despite declining numbers of water birds) 'defensible'³

Considerations when assessing the accuracy and usefulness of the IHM

"Firstly, there is a need to reiterate that all proxies, as well as estimates of water in the landscape are prone to error. Also, the decisions in relation to setting of annual duck hunting regulations and seasons may be influenced by a range of factors. Thus, we should caution against naively expecting highly clear-cut patterns of index values for the various bag-limit categories."⁴

1. The GMA has a vested interest in creating and using a model that will bias towards finding justifications for calling a season, as the GMA draw their

¹ https://www.regionalvictoriansotds.com/_files/ugd/3f2134_d717d9463a69459ca0247d4427702dec.pdf

² https://www.regionalvictoriansotds.com/_files/ugd/3f2134_d717d9463a69459ca0247d4427702dec.pdf

³ https://www.regionalvictoriansotds.com/_files/ugd/3f2134_d717d9463a69459ca0247d4427702dec.pdf

⁴ https://www.regionalvictoriansotds.com/_files/ugd/3f2134_d717d9463a69459ca0247d4427702dec.pdf

continued existence and therefore employment, from the continuation of the activities of recreational shooting. It follows that advice from the organisation of the viability of a season cannot be trusted if that body's viability is intrinsically tied to perpetuating the activity.

The IHM has only been in existence since 2021 and is therefore largely untried and untested. The model has not been reviewed by any independent panels, nor has it been peer reviewed. It has only been vetted by organisations who have a vested interest in promoting recreational duck shooting.

2. The indices used make sweeping generalisations across the state and make no allowances for the vast differences in climatic and environmental conditions that affect waterbirds within different regions of the state.
3. The IHM never recommends cancelling a duck season, which should be one of the potential recommended outcomes if the purpose was to genuinely consider waterbird populations and breeding, now and in the future. At best, it recommends a bag limit of 1, therefore this is not a model to guide decision making on whether a duck season should occur, it is a highly biased model used to justify a decision on how many ducks can be killed daily.
4. There is no recognition that climate change has affected breeding cycles and therefore the recreational duck shooting season can occur at a time when there are many young birds who become orphaned when their parents are shot, which has longer term implications for waterbird populations (as occurred in 2010)
5. Relying on data from hunting bag collections on opening weekend⁵ provides neither useful nor accurate data. More shooters are out on opening weekend than other weekends, authorised officers are only present at a handful of locations, of those locations with multitudes of entry and exit points only a handful of bags are checked. No authorised officers are present on the water to check and count the numbers of birds shot, killed and not retrieved, nor those shot, injured and not retrieved. In short, data from shooters' bags on opening weekends provides a contextless snapshot of an unknown portion of birds shot at an unknown portion of wetlands and counted by a known number of officers.
6. Relying on water surface area at certain wetlands ignores that different species of ducks prefer different depths of water therefore total surface area without depth analysis does not provide accurate data on duck populations, nor expected breeding habits. There is also no collection of data on types of water, e.g. creeks, rivers, dams, lakes which is also a consideration for waterbird populations and breeding.

⁵ https://www.gma.vic.gov.au/__data/assets/pdf_file/0009/907245/Using-duck-proxies-and-surface-water-to-inform-hunting-arrangements-for-2023-FINAL.pdf

7. Considering the ‘unseasonable weather’ enjoyed by Victorians, using water surface estimates from 1 or 2 years ago and applying monthly shifts seems pseudo-science at best.
8. Using an ‘upward correction’ to increase the values because the NSW aerial bird counts showed a lower than average population⁶ is nonsensical. The count was lower than average because bird numbers are in decline, and fabricating ‘correction factors’ to massage the numbers to a level more in line with advocating for a recreational duck season is bordering on deceitful.
9. The predicted/observed aerial survey counts in Victoria and NSW as well as the game count in Victoria, attempt to fit a linear relationship graph to data in a way that would be mocked by any legitimate statistician. Earlier it was admitted that ‘linear modelling’ of bag counts provided no ‘meaningful insight’⁷, this admission needs to be extended for the remainder of this data.
10. The modelling only considers 40 ‘priority’ wetlands. Considering that the number of ‘common’ recreational duck shooting locations is greater than ten times that number, and that duck shooting also occurs on private land, this minimal representation is not sufficient to allow accurate modelling to occur.
11. The IHM does not differentiate between species, nor populations abundance of species, therefore comparing years where no game birds were restricted from being shot with years where species were exempt from being hunted skews the data for certain species and provides an uneven and inaccurate comparison of data from different years.
12. The social, economic and ecological costs and benefits are not considered in this model, yet the impacts on these are tremendous and should not be ignored in decision making.
13. *“We advocate that the model here presented be used as a tool to inform decision making for hunting arrangements; it should not be used to set hunting arrangements without due diligence”⁸*
There is no one actually performing due diligence, and no mention of this as a consideration.

⁶ https://www.gma.vic.gov.au/__data/assets/pdf_file/0009/907245/Using-duck-proxies-and-surface-water-to-inform-hunting-arrangements-for-2023-FINAL.pdf

⁷ https://www.regionalvictoriansotds.com/_files/ugd/3f2134_d717d9463a69459ca0247d4427702dec.pdf

⁸ https://www.regionalvictoriansotds.com/_files/ugd/3f2134_d717d9463a69459ca0247d4427702dec.pdf

14. The IHM concedes that the model is based on past data, does not consider drastic changes to influencing circumstances, recognises that there are many variables not adequately addressed, and in short bends over backwards to describe itself as indicative only and to present excuses in advance if they 'got it wrong'. How can this be used by a guide to inform our government's decision making with any degree of accuracy or confidence?

Eastern Australian Waterbird Aerial Survey 2022

The 'Eastern Australian Waterbird Survey', (also known as the 'Kingsford Survey') conducted annually since 1983 by a team associated with the UNSW Sydney, "*provides one of the few quantitative, large scale biodiversity datasets that can monitor changes in the distribution and abundance of 50 waterbird species, including threatened species, and the health of rivers and wetlands.*"⁹

The survey is conducted to high standards of scientific research using a consistent methodology, at the same time of year, across the same areas, and implementing a consistent counting and reporting process. Data accuracy is therefore of a high calibre and provides a strong basis for comparison and the evaluation of trends.

Duck numbers are in Decline

"Despite two successive La Niña years three major indices for waterbirds (total abundance, number of species breeding and wetland area index) continued to show significant declines over time"¹⁰

(Aerial Survey of Waterbirds in Eastern Australia - October 2022 Annual Summary Report J.L. Porter, R.T. Kingsford2 , R. Francis, K. Brandis and A.Ahern)

"Most game species of ducks had abundances well below long term averages, in some cases by an order of magnitude; six out of eight species continued to show significant long term declines (OLS regression at $p=0.05$; variables 4th root or log transformed where appropriate Table 3). Grey Teal declined from the previous year. Australian Wood Duck was the only species above (slightly) the long term average. Some duck species declined in abundance compared to 2021 – Grey Teal, Pink-eared Duck and Hardhead."¹¹

(Aerial Survey of Waterbirds in Eastern Australia - October 2022 Annual Summary Report J.L. Porter, R.T. Kingsford2 , R. Francis, K. Brandis and A.Ahern)

Duck numbers are in decline in Victoria. This is indisputable. The scientific waterbird surveys support this fact, the observations of birdwatchers and wildlife rescuers support

⁹ <https://www.ecosystem.unsw.edu.au/research-projects/rivers-and-wetlands/waterbirds/eastern-australian-waterbird-survey>

¹⁰ <https://cdn.revolutionise.com.au/news/j5to2cffgglmbix.pdf>

¹¹ <https://cdn.revolutionise.com.au/news/j5to2cffgglmbix.pdf>

this fact, and even duck shooters support this fact. Most importantly, our most scientifically conducted, reliable and accurate study, the Aerial Survey of Waterbirds in Eastern Australia, supports this (Table 3)¹²

Table 3. Trends in abundances of game species from the Eastern Australian Waterbird Aerial Survey (1983-2022).

Species	Trend	Regression all years	Trend	Regression 1983-84 omitted
Pacific black duck	decline	$r^2=0.32$, $p<0.001$	decline	$r^2=0.21$, $p=0.004$
Australasian shoveler	decline	$r^2=0.54$, $p<0.001$	decline	$r^2=0.49$, $p<0.001$
Chestnut teal	decline	$r^2=0.11$, $p=0.035$	no trend	$r^2=0.08$, $p=0.083$
Grey teal	decline	$r^2=0.26$, $p=0.001$	decline	$r^2=0.16$, $p=0.014$
Hardhead	no trend	$r^2=0.06$, $p=0.118$	no trend	$r^2=0.03$, $p=0.275$
Mountain duck	decline	$r^2=0.35$, $p<0.001$	decline	$r^2=0.28$, $p=0.001$
Pink-eared duck	no trend	$r^2=0.12$, $p=0.032$	no trend	$r^2=0.09$, $p=0.074$
Australian Wood duck	decline	$r^2=0.19$, $p=0.005$	no trend	$r^2=0.08$, $p=0.091$

Therefore, to actively seek to kill **more** birds in a population already in decline, for no purpose other than the recreational pursuit of a few, makes no sense and is not at all in line with community expectations.

Duck shooting no longer has a social licence with a Roy Morgan poll indicating that 75 percent of people want this activity banned.

In 2021, The Arthur Rylah report indicated that numbers of pink-eared ducks and blue-winged shoveler ducks were too low to allow any ‘robust’ analysis.¹³ In 2022, the Aerial Survey of Waterbirds in Eastern Australia showed a further decline in the abundance of pink-eared ducks. If a duck shooting season is held in 2023 (against all logic, common sense and consideration for duck populations), the only responsible course of action in regard to these specific species is to remove them from the game bird list for 2023.

Additionally, the GMA’s ‘Considerations for the 2023 duck season’ states that Grey teal represented 18% of birds killed in 2021, the third highest species, and the Eastern Australian Waterbird Aerial Survey in 2022 subsequently shows the grey teal population to be in decline. Drawing a linear relationship between those 2 facts would be a more

¹² <https://cdn.revolutionise.com.au/news/j5to2cffgglmbix.pdf>

¹³ https://www.ari.vic.gov.au/__data/assets/pdf_file/0029/519239/ARI-Technical-Report-325-Abundance-estimates-of-game-ducks-in-Victoria-2020-aerial-survey.pdf

valid conclusion then the many other linear relationships modelled throughout this process.

Victorian game duck abundance survey

“Total waterbird abundance in 2021 (n=95,306) decreased from 2020 and remains well below average: the 3rd lowest in 39 years.”

(Aerial Survey of Waterbirds in Eastern Australia - October 2021 Annual Summary Report J.L. Porter, R.T. Kingsford2 , R. Francis and K. Brandis)

“Total waterbird abundance in 2022 (...) remained well below the long term average: the 11th lowest in 40 years.”

(Aerial Survey of Waterbirds in Eastern Australia - October 2022 Annual Summary Report J.L. Porter, R.T. Kingsford2 , R. Francis, K. Brandis and A.Ahern)

The Kingsford survey has been conducted since 1983 and is accepted and highly regarded within the scientific community, as stated previously.

Coincidentally, after a number of years where results show declining bird numbers which have affected the length, and permitted bag limit of the recreational duck shooting season in Victoria, the GMA have decided to conduct their own aerial bird surveys. This appears to be a case of ‘if you don’t like the data, find new data that you do like’. Placing continued reliance on the GMA to provide advice indicates the Government is only seeking to justify a decision they have already made and it weakens the credibility of public institutions as a result.

“Helicopter counts of randomly selected farm dams were conducted throughout the NSW Riverina in June 2022 to determine waterfowl abundance in order to set annual crop damage mitigation destruction quotas. Unlike other years, large dams, wastewater ponds, wetlands and channels were not surveyed in 2022, which may have affected results”. Game duck numbers decreased from the previous year by 16%¹⁴

Even when the area surveyed is smaller, missing many areas of duck habitat, includes whistling ducks which is not a game species in Victoria, and is conducted by those with a vested interest in reading higher duck numbers, the number of waterbirds is STILL shown to be in decline.

These surveys are not expected to release their results until Feb-March, after advice is provided to the Minister regarding calling a 2023 recreational duck season. They were conducted over broken periods of time due to floods in 2022, therefore there is no continuity or consistency in the results, and by their own admission have been shown as

¹⁴ file:///O:/Tucker%20rd%20-%20DISPENSARY/NATALIE/GDR-Geeolong%20Duck%20Rescue/2023%20season/2023-Duck-season-considerations-Final%20gma.pdf

'compromising the data obtained' Yet they are still considered by GMA when they make their recommendation for the 2023 duck season.

Using the GMA counts to inform decision making makes a mockery of any pretence that there is any scientific rigour in the decision making process when determining whether to hold a recreational duck shooting season. It is the commonly held belief by our membership, and parts of the broader community, that the only reason the GMA has opted to conduct its own aerial surveys is that it was continually embarrassed by the Kingsford report and sought 'alternative facts' to better support its agenda of continuing a duck shooting season against the scientific advice.

“The 2022 game duck abundance index was the 3rd lowest recorded in 40 years and is at 25% of the long-term average”.¹⁵

(Considerations for the 2023 duck season Current as at 20 December 2022 - GMA p22)

And GMA STILL recommended a recreational duck shooting season!

Climate change and Environmental considerations

The Anthropocene climate change has brought multiple new and varied threats that disproportionately impact water systems. Climate change is a reality that the State Government has accepted and holds to be central to policy and decision making. It must therefore be acknowledged that when a species is identified as being under pressure, as with the long-term decline of water bird numbers and the complex threats to ducks imposed by climate change, it is irrational to place any further pressure on those species for the sake of a recreational shooting season.

The Bureau of Meteorology has released long-term forecasts indicating that the La Nina weather system is likely to slacken and transition to an El Nino effect in the coming 12-24 months¹⁶, bringing with it a potential for some of the more severe levels of droughts Australia has seen¹⁷. Such conditions are incredibly punishing to the survival of native waterbirds. To pursue a recreational shooting season knowing that this is the likely future is deeply irresponsible. It smacks of a cavalier attitude of 'better kill some ducks now before they're all gone' rather than anything approaching sustainability.

Case Study

¹⁵ file:///O:/Tucker%20Rd%20-%20DISPENSARY/NATALIE/GDR-Geeolong%20Duck%20Rescue/2023%20season/2023-Duck-season-considerations-Final%20gma.pdf

¹⁶ <http://www.bom.gov.au/climate/enso/>

¹⁷ <http://www.bom.gov.au/climate/ocean/outlooks/#region=NINO34>

In 2010, warmer than usual weather led to many ducks having a second clutch of ducklings, coinciding with the start of the recreational duck season. Despite common knowledge of this occurrence and attempts to request this be taken into consideration during decision-making, the duck season proceeded with a bag limit of 5 waterbirds, plus 3 additional wood ducks. The early weeks of the season were devastating as parent ducks were shot, and orphaned ducklings were left unable to fend for themselves. Wildlife rescuers worked around the clock to try and rescue ducklings and get them to care but sadly, many didn't survive.

Floods

“The 2022 eastern Australia floods were one of the continent’s highest on record in some places, from February to November, primarily in south east Queensland, northern coastal New South Wales, the Central Coast and parts of Sydney”¹⁸

The extensive floods during 2022 can have unpredictable impacts on waterbird populations. Flooding can cause black water¹⁹ which impacts water quality, marine life, water oxygen levels, and algae growth and prevalence. This in turn affects accessibility and viability of food sources²⁰ both in the water on the reduced amount of land, water depth and breeding suitability and safety and stability of nesting.

Additionally, the recent floods follow a period of years of drought, which also negatively impacts food sources, habitat, migration patterns and breeding habits for water birds.

Whilst difficult to quantify, acknowledging that floods may have an unknown impact on bird numbers for a number of years is imperative.

Enforcement

Each year the GMA has the responsibility for enforcing the Wildlife Act and the regulations as relates to the duck shooting season. Each year since the inception of the GMA, the agency has been critically understaffed rendering them unable to competently attend to, and police, the vast majority of shooting locations. With fewer than 20 of their own enforcement officers and several hundred, if not thousands of sites, there is no pretence that the officers are going to attend anything more than a fraction of sites where shooting may occur.

Additionally, the majority of wetlands available to recreational duck shooting are not observable from the waterline due to the vegetation concealing the duck shooters and

¹⁸ <https://cdn.revolutionise.com.au/news/5to2cffgglmbix.pdf>

¹⁹ <https://www.abc.net.au/news/2022-10-25/murray-darling-water-quality-warning/101572858>

²⁰ <https://www.australiangeographic.com.au/topics/wildlife/2022/03/what-are-the-effects-on-wildlife-during-flooding-and-how-can-you-help/>

any potential offences they may be enacting. The vast majority of authorised officers witnessed by our members do not even attend the wetlands dressed to go into the water to seek out offences, some are not even qualified to do so as the use of wetland wading gear is an additional qualification. Many officers do not even exit their cars. The authorised officers we have generally encountered have relied almost solely on information and evidence of wrong-doing from volunteer members of the public.

In instances where the GMA have recruited additional support from other enforcement agencies including Victoria Police, Fisheries and Parks Victoria, these officers have been demonstrably under-trained and are inexperienced in the full range of potential offences for which they need to observe.

If GMA is to have any legitimacy as an enforcement agency, it must commit to staffing and training their enforcement team adequately so as to properly police a significant number of wetlands throughout the entire season. However, this would entail a significant cost which would be better spent on conservation.

In past years, enforcement officers have disclosed to Geelong Duck Rescue that their maximum shift time ends earlier than the close of legal shooting time. This has left no enforcement officers available at all during peak times of shooting, such as the closing hours of the first day of the season, when a large number of offences occur. This has been allowed to happen as all the staff were rostered on for the opening morning of the season. We understand that recently GMA have sought to correct that problem somewhat but the fact remains that a legal shooting period in a day is often longer than that of the officers' shifts so that staggering work shifts becomes a necessary technique which cannot be realistically achieved with such an understaffed team.

The critical point in the staffing issues of the GMA is that all duck shooters are keenly aware of the limits of the GMA's abilities and they can, and frequently do, take full advantage of the knowledge that they are very unlikely to ever be caught in the commission of an offence.

It has also come to the attention of Geelong Duck Rescue that the GMA do not even have a reliable database of all the legitimate shooting locations across Victoria, let alone a full knowledge of possible private lands to which their responsibility also extends. The public would expect that the enforcement authority responsible for regulating an activity in which firearms are principally involved should at least have a thorough knowledge of where that activity could occur. The maps made available online are acknowledged to be incomplete and rife with errors. Duck shooters cannot comply with the law when the information provided to them by the GMA is faulty in the first place.

Furthermore, the vast number of alleged offences by duck shooters witnessed by community volunteers and duly reported to GMA with evidence provided, receive no attention or follow-up from officers.

In the Pegasus report of 2017²¹ , it noted that enforcement was significantly biased in this way, but it appears that no real change has occurred within the agency in the intervening time. In order for the GMA to attempt to regain public trust they must be seen to be actively pursuing cases fairly and a much greater degree of effort in community collaboration and trust-building is required.

GMA Bias

The Game Management Authority has not existed without controversy. The 2017 Pegasus Report²² discusses the implications of GMA promoting hunting (Pegasus Economics 2017). GMA has been criticised for being ‘neither impartial nor independent’ (Pegasus Economics 2017). The current *Game Hunting in Victoria: A manual for responsible and sustainable hunting*²³ from 2018 discusses the economical and social benefits of hunting, showing a bias towards the promotion of the hunting (GMA 2018).

As an organisation paid to monitor compliance of the season, it is in the best interests of the GMA to continue to hold duck shooting seasons because they are financially dependent on it. This is a clear conflict of interest. This bias should prevent the GMA from having the ability to make recommendations based on their own research.

Community gun safety and duck shooting

Urban areas are expanding and encroaching upon game reserves and other nature areas where duck shooting occurs, making the safety of residents and visitors of paramount concern to everyone. This is especially worrying in areas such as Geelong where housing estates such as Armstrong Creek, (which will house tens of thousands of residents when complete), are closer than 2 kilometres from where recreational duck shooting takes place. Considering that there is no boundary for where shooting ‘finishes’ until you reach the Barwon Heads Rd, shooting may occur within the range of vehicles, as well as local community facilities.

Recreational firearm use does not belong in proximity to residential living, shopping centres, schools and sporting grounds, all of which exist in abundance surrounding the Lake Connewarre wetlands. The vast majority of residents are unaware that shooting is

²¹ https://8c4b987c-4d72-4044-ac79-99bcaca78791.filesusr.com/ugd/b097cb_97d51dc5a28a4c9e992c231ee0e9cf1e.pdf

²² https://www.gma.vic.gov.au/__data/assets/pdf_file/0011/481682/Assessment-of-the-GMAs-compliance-and.pdf

²³ https://www.gma.vic.gov.au/__data/assets/pdf_file/0010/499096/Game-Hunting-in-Victoria-2nd-edition.pdf

permitted so close to their homes or community hubs and can become alarmed when hearing gunshots. Continuing to allow firearms to be discharged so close to highly populated and actively used areas is a recipe for disaster that could easily be avoided.

If these wetlands are going to be used for duck shooting, then adequate signage aimed at warning the community that duck shooting is taking place in the area, and of the potential dangers, should be placed at every entrance to the wetlands which is in close proximity to populated areas. At present, there is no signage which indicates that people are restricted from entering the wetlands, yet they can be fined if they do so.

Regional Victorian Tourism

The past two years have had unprecedented impacts on all businesses, communities and individuals. Populations who have been significantly affected by the COVID-19 imposed lockdowns and restricted travel are our regional towns and communities, many of whom rely heavily on tourism for jobs and financial stability.

“In the six months ending June 2020, total visitors to and within Victoria was 30.7 million, a decline of 19.9 million visitors (-39%) compared to the same period in 2019. Total visitor spend in Victoria over this period experienced a deeper decline (-43%, or down \$7.0 billion) to \$9.3 billion.”²⁴

Eco-tourism was on the rise pre-pandemic, across the general population, who were looking to lessen their environmental footprint whilst travelling²⁵. This value should be considered when making decisions about who can access our natural environment and when.

Many of our outdoor pursuits revolve around the tranquillity of water. Swimming and kayaking require healthy, clean bodies of water. Birdwatching and wildlife watching depend upon the presence of established wetlands where birds reside or migrate to, or where wildlife visits regularly.

The economic value of birdwatching is often overlooked, however studies have shown this to be significant contributor to tourism²⁶. The construction of raised boardwalks, bird hides and viewpoints in wetland and natural areas, can provide substantial recreation opportunities for many people, not just birdwatchers, and building all-access pathways creates equal opportunity for all to enjoy the region.

Unfortunately, a duck shooting season creates an environment where the locals, visitors and tourists are prevented from taking part in these nature activities and pursuits.

²⁴ https://business.vic.gov.au/__data/assets/pdf_file/0003/1984620/Coronavirus-COVID-19-impact-on-Victorias-Visitor-Economy-released-April-2021.pdf

²⁵ <https://www.nielsen.com/au/en/insights/article/2019/eco-tourism-is-not-just-for-greenies/>

²⁶ <https://www.responsibletravel.org/wp-content/uploads/sites/213/2021/03/market-analysis-bird-based-tourism.pdf>

Access to wetlands and waterways is restricted for 3 months of the year (if a 'full' duck season is held) for those who don't hold the relevant duck shooting and firearms licences.

According to the GMA's 'Considerations for the 2023 duck season' document, this means that the '23,098 Game Licence holders endorsed to hunt duck in 2021' (down from 24,330 last year) have free reign for their recreational activities, which leaves the remaining 99.654% of Victoria's population²⁷ unable to freely and safely access public nature areas.

The challenges of COVID-19 lockdowns and high case numbers, has also changed how we use our recreation time. People feel more comfortable, 'safer' and are more likely to meet outside rather than in a confined space. Additionally after many months of people's movements being restricted, or being confined to their homes in isolation, there is a strong desire for many to return to nature and to spend time away from crowded, urban environments. Supporting the physical and mental health of individuals and the struggling communities in which they will spend time and tourism dollars is vitally important and we also have an obligation to support regional Victoria to the best of our ability. This means opening regions to all Victorians and interstate visitors and not restricting our public areas only to those who wish to shoot ducks.

Recommendations

1. The 2023 recreational duck shooting season should not proceed. The GMA should advise the Minister that the season in 2023 is unsustainable and inappropriate in the eyes of the community.
2. Consider the protocol used for data collection of bird numbers, breeding abundance and wetland conditions and only accept data collected by methods which would stand up to the scrutiny of the scientific community for acceptability/accuracy.
3. Consider that GMA aerial surveys should be used only as supplementary data to the Kingsford report, until such a time as a legitimate and respectable methodology is developed and publicly disclosed and the surveys have built up a history of data to show trends comparable to the Kingsford report..
4. Consider the long-term implications on biodiversity from removing significant numbers of native waterbirds from local populations.

²⁷ <https://www.abs.gov.au/statistics/people/population/national-state-and-territory-population/latest-release>

5. The Victorian Government must commission a follow up review of the GMA by Pegasus Economics, to determine if the issues identified in 2017 have been adequately addressed and corrected.
6. GMA should provide a detailed response to how they have addressed each issue and how they are planning to tackle any unresolved problems and over what time frame. Responses must be reviewed by an independent panel of experts and a report submitted to the Minister.
7. Develop an independent panel of experts and community stakeholders to provide advice and recommendations to the government regarding duck shooting as GMA have a clear conflict of interest.
8. Employ and adequately train and resource a far larger enforcement team capable of monitoring the wetlands across the state to meet community expectations.
9. Pledge to support tourism and local economies across regional Victoria by supporting and promoting tourism opportunities which include and benefit all of the population.
10. Implement a review of the Interim Harvest Model to be conducted by a panel of independent experts in the field. Subject the model to the rigorous of a peer review.

In the event that the season does go ahead against our recommendations, the following applies:

11. The season should be significantly reduced in length, to a maximum of 4 weeks.
12. The Blue-Winged Shoveler should remain a prohibited species as it has for the past few years, due to its ongoing low numbers.
13. The Hardhead duck should remain a prohibited species as it was in 2022, due to its ongoing low numbers.
14. The Pink-Eared Duck should be added to the prohibited species list due to low numbers.
15. Each game species must be given a significantly reduced bag limit (especially the 5 game birds recognised by GMA as experiencing 'long-term declines") as well as having a reduced daily bag limit overall. Each of the game species is acknowledged to be under pressure.

16. Any designated hunting area that is now within 2km of a major community facility, such as shopping centres, schools, sports grounds and community halls, should be closed to shooting for the duration of the season. This particularly applies in the case of Connewarre wetlands in Geelong.
17. Install adequate warning signs at all locations where shooting is allowed.

Conclusion

Duck shooting in Victoria has lost its social licence with surveys indicating that over 75 percent of people want this activity banned. Wildlife is in serious decline especially in Australia and we should be protecting our native species, not killing them for “sport” Nature tourism has been shown to be much more economically viable than any monetary benefit related to duck shooting.

If the duck shooting season does go ahead, despite clear evidence that it should not, then significant restraints must be placed upon the season and GMA must undergo a serious review of their functioning and their method of conducting aerial surveys as well as a review of their reliance on untested modelling to guide their recommendations.

We believe it is irresponsible to hold a 2023 recreational duck shooting season in Victoria. It risks the long-term viability of duck populations, increases the risks to humans and animals from the loss of biodiversity and the increased risk of zoonotic diseases and has negative impacts on already struggling regional communities. Wetlands are being destroyed and illegal shooting of waterbirds is pervasive throughout Victoria. We therefore recommend that the Game Management Authority (GMA) supports a moratorium on the 2023 duck season.

Critically, the Minister’s decision about whether to hold a duck shooting season should be based upon recommendations from an independent body with no financial interest in the outcome due to the clear conflict of interest that exists when the GMA are responsible for this recommendation.