

8 January 2024

Mr Graeme Ford
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Submitted by email: graeme.ford@gma.vic.gov.au **cc:** simon.toop@gma.vic.gov.au

Dear Graeme,

Animals Australia Submission: Considerations Relevant to Duck Shooting in Victoria 2024

We write in response to the email dated 19 December 2023 from Simon Toop to Animals Australia.

We note stakeholders are invited to submit additional data regarding Board consideration of a proposed 2024 duck shooting season, subject to government's response to the recent Legislative Council Inquiry into 'Recreational Native Bird Hunting Arrangements' that recommended an immediate ban on recreational duck shooting (i.e., no season in 2024).

Our concerns about recreational duck and quail shooting were presented in detail in our submission to the Inquiry (provided at **Attachment A**) and our presentation to the Inquiry. Rather than repeat that material, we now present an analysis of the available data which differs significantly from the emphasis and conclusions of GMA staff.

As the Victorian government is currently considering the findings of the Inquiry and – as such – the future of duck shooting, it is relevant to present our analysis through the lens of the political context.

EXECUTIVE SUMMARY

A. Despite the recent extended la Nina cycle of rainfall (now followed by El Nino):

- i. The uptick in game duck abundance across eastern Australia was weaker than previous rebounds;
- ii. Five of the eight game duck species remain in long-term decline;
- iii. A sixth species (Chestnut Teal) recently left the long-term decline list, but its recovery is confined to Victoria. It will be at risk if shooting proceeds; and
- iv. A seventh species (Hardhead) has been below average for the past 11 consecutive years; it only avoids the "long-term" decline list because it was resilient last century.

B. Loss of habitat (e.g., water diversions, irrigation schemes) is recognized as the prime cause of long-term species decline. This cannot be easily reversed. It is therefore all the more urgent and critical to remove avoidable threats – especially recreational bird hunting.

- C. Bird wounding (as opposed to ‘clean kills’) is inevitable when shotguns are used, and stricken ducks suffer terribly from appalling injuries and slow death.
- D. Wounding reduction proposals cannot remove this unacceptable cruelty. Duck shooters have shown little interest in training, but even if the wounding rate could eventually be reduced to 10 per cent (as seen in Denmark after several decades of training), that would be ~32,000 birds in pain and distress every year – and completely contrary to any “social licence” that hunters claim.
- E. GMA’s ‘*Considerations*’ for the 2024 season seem to reflect shooters’ focus on short-term upticks in waterbirds in Victoria rather than long-term decline and sustainability across eastern states.
 - i. The Eastern Australian Waterbird Survey (**EAWS**) monitors 10 Bands across Qld, NSW, and Victoria; Victoria has one of only two Bands currently preferred by waterbirds.
- F. The pursuit of Adaptive Harvest Management (**AHM**) is an expensive, esoteric, and academic exercise. AHM - and its interim forms - provide no guarantees of protecting our game duck species, the majority of which are in long-term decline. Nor does this approach “remove the politics.”
 - i. AHM is used in the northern hemisphere on species that are *increasing*. It is inappropriate to experiment in this way on our species that are *decreasing*.
 - ii. Victoria’s 2023 duck season demonstrated the North American experience with AHM: large changes in hunting rules resulted in minimal changes to the harvest. In other words, the modelling failed.
- G. The recent Legislative Council Inquiry into recreational native bird hunting was in fact the second taxpayer-funded review prompted by public concern about duck shooting. In 2017, Pegasus Economics was engaged to review the GMA and recommended a reduction in its functions to avoid conflicts of interest. Instead, additional funding boosted its influence. A 2024 shooting season would further erode public faith in taxpayer-funded reviews.
- H. **The only appropriate approach in 2024 – as per alignment with the Legislative Council Inquiry report – is for recreational shooting of native birds to be cancelled forthwith.**

Animals Australia’s analysis of data and research to date

1. Political context

The recent parliamentary Inquiry into *Recreational Native Bird Hunting* (hereafter “**the Inquiry**”) was not the first taxpayer-funded review related to bird hunting. The report, [Assessment of the GMA’s Compliance and Enforcement Function](#), was produced in 2017 by Pegasus Economics (hereafter “**Pegasus**”) following illegal and irresponsible duck-shooting behaviour that was initially kept from the [then] Minister. The [then] Minister then inadvertently misinformed the Victorian Parliament that the opening weekend was “very orderly”.¹

Pegasus severely criticised GMA and noted that an independent authority for hunting is an expensive arrangement risking “capture” by those it seeks to regulate. It found that GMA was “too comfortable” with shooters. A key recommendation was to split the GMA; leaving the Authority to educate hunters and promote hunting with GMA, while returning regulatory duties to a larger Department.

The Andrews Government failed to implement this fundamental reform, instead simply boosting the GMA budget as the 2018 election approached.

If the current Allan Government accepts a recommendation from GMA to hold yet another duck season (even with tighter controls or modification), the public will see this as a stark contradiction to the Inquiry’s main recommendation (**an immediate ban**), and consequently the second time a taxpayer-funded investigation has resulted in a waste of time and money.

There has been no independent review of GMA since 2017 to assess whether GMA is an impartial adviser and regulator. In 2014 – just as GMA was being established by the former government – a similar body (Game Council of NSW) was disbanded due to conflicts of interest (i.e., trying to both regulate and promote hunting).

Our submissions below demonstrate that GMA’s approach to duck season policy is far from impartial. The GMA approaches the issue through the lens of the hunting fraternity (seeking justification for another season), rather through the lens of acceptable community standards.

Regardless of the concerns expressed above, it was made clear throughout the Inquiry evidence that no ‘authority’ or ‘regulator’ would be able to provide the extensive monitoring of thousands of wetlands and hunters, nor alter the basic physics of shotgun shooting of flying birds, such that this pastime could be made humane or sustainable.

2. Cruelty

GMA’s [Considerations for the 2024 duck season](#) document (hereafter “**Considerations**”) completely omits any mention of wounding. **Yet wounding is the main issue that destroys any so-called “social licence” for duck hunting.** GMA’s recommendation to the Ministers must not be confined to only the important issue of sustainability.

GMA’s latest wounding report, [Monitoring trends in waterfowl wounding 2023](#) (hereafter “**the wounding report**”) found embedded steel pellets in 2.4 per cent of (captured) survivors of the 2023 shooting season.

Using GMA’s population estimate of 2.4m game ducks, that scales up to **57,600 wounded survivors**. However, the wounding report acknowledges this is an underestimate as research has shown most of the stricken would not survive long enough to be captured and tested.

¹ Legislative Council Hansard, 21.3.17, page 1476.

Note too that many further birds are wounded but retrieved and then killed, and at times in an elongated and often inhumane manner.

Only the Pacific Black Duck and Grey Teal were found to carry embedded pellets, and the wounding report conceded this may be because larger birds are better able to survive wounding. In other words, victims from the other four game duck species wounded this year had likely died before testing occurred.

According to *Considerations* (at page 40), these four species together accounted for one-quarter of the total “harvest” – yet their wounding could not be monitored at all.

GMA has not publicly released the proposed Wounding Reduction Action Plan (**WRAP**). We obtained a copy via a Freedom of Information (FOI) release to another party. Although the WRAP claims to follow the Danish model, there are critical differences, for example:

- The WRAP would only require new duck shooters to undergo accuracy testing; all those responsible for the wounding to date would be exempt and continue without testing. In contrast, all bird hunters in Denmark have been subjected to an expensive and arduous education and skill testing program for years².
- After several decades of effort, the Danes have reduced the wounding rate of their Pink-Footed Geese (PFG) to about 10 per cent. In 2022, that would have resulted in 1,358 PFG wounded in Denmark. In Victoria, where the average “harvest” is 24 times as large, a 10 per cent wounding rate would mean 32,000 birds in lingering, severe pain. Worse still, most Victorian game ducks are in long-term decline (while the PFG is increasing).

In our informed view, the Victorian community will never accept such a cruel outcome, particularly if taxes are paying for a WRAP (and also subsidising duck hunting) over decades. To further illustrate the chasm between the GMA approach versus acceptable community standards we quote a chilling throwaway line in the wounding report (at page 10):

“... radiographs can only detect those birds carrying embedded pellets but does not detect those animals that have been shot and pellets have passed through the body. Examples of this were observed in a small number of ducks that had evidence of apparent gunshot injuries to their bills and feet.”

For members of the public, the sight of a native waterbird with deformed/damaged feet or bills would evoke compassion; and these are the ‘survivors’. Such mutilation to live ducks is not consistent with community standards, and particularly so when it is an ‘unnecessary’ infliction of pain and suffering for a recreational pursuit. Indeed, this is the very definition of ‘cruelty’ in current Victorian animal cruelty law, yet this wounding ‘consideration’ is ignored by the GMA’s *Considerations* for the proposed 2024 season.

A similar disjunct is clear in the GMA’s new report, [Assessment of waterbirds deposited at Treasury Place following opening week of the 2023 duck season](#), which appears to be a taxpayer-funded investigation into longstanding claims from shooters that native waterbirds (game species and protected species) displayed at Treasury Place were not really shot that season. The description of injuries is stark, but no attention is given to whether the pellets found in x-rays were likely to cause a lethal injury or a lingering death. No vets participated in the assessments. It seems the intention of embarking on this report was to: discredit the work of duck-rescuers; deny the reality of ducks illegally shot and/or illegally abandoned by

² Information obtained from GMA Board papers released under FOI.

shooters; and/or downplay the suffering and impairment of stricken ducks. The report provides (at page 4):

“Death by shooting could be inferred by the presence of embedded pellets, however, game ducks are known to survive being shot and may carry embedded pellets for the remainder of their life. Other sources of mortality may have been the cause of death.”

The lack of transparency regarding the WRAP (compared to the Danish situation) seems contrary to section 8A(f) of the *Game Management Authority Act 2014* which requires transparency by GMA in such matters of public interest.

See **Attachment B** for further information regarding wounding research and related aspects.

3. Sustainability

3.1 Concerns re the Considerations document

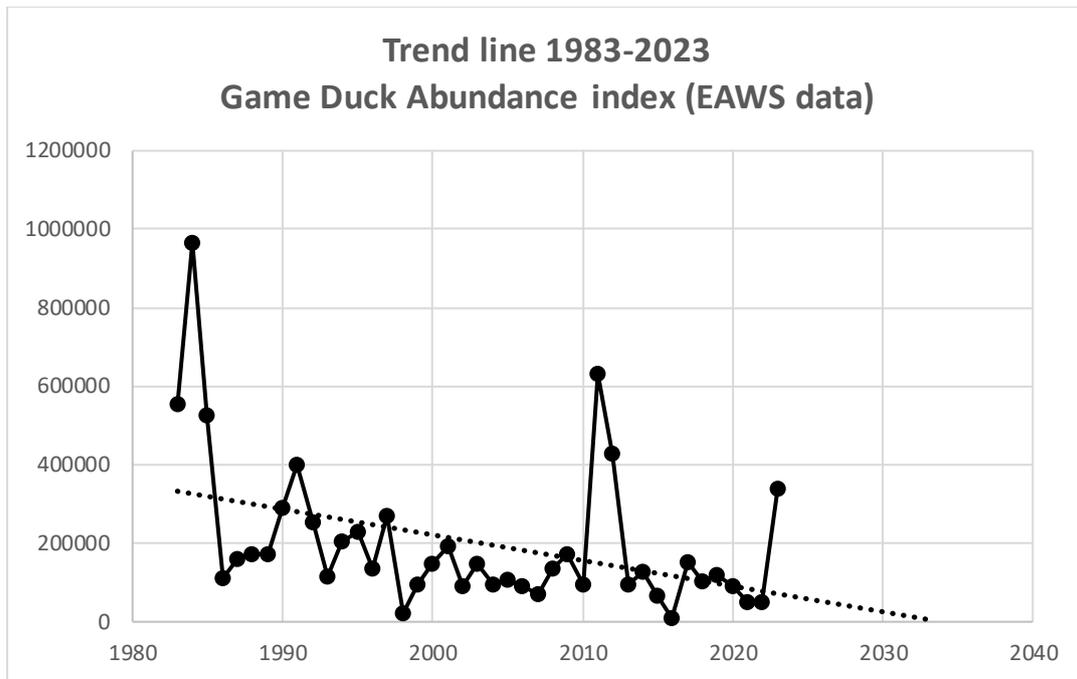
In *Considerations*, GMA’s **Summary** (see pages 44 - 45) **omits** three most important and relevant points:

- i. As noted in the ‘41st Eastern Australian Waterbird Survey’ (hereafter **EAWS 41**), despite several years of La Nina rains, **five of the game duck species remain in long-term decline**. This is serious because El Nino (hotter, drier) has now returned.
 - The Chestnut Teal recently moved out of long-term decline, but its rebound is confined to Victoria³, so a 2024 shooting season will risk that fragile recovery.
 - The Hardhead abundance has been below average for the last 11 years⁴. It does not rate as “long-term decline” because it was resilient last century.
- ii. As Professor Kingsford (co-author of the EAWS) has frequently stated, the ducks’ “rebound” in good years is like a tennis ball bouncing – lower and lower⁵. This can clearly be seen from this graph, but GMA fails to include a trend line or comment on this pattern:

³ EAWS41, p16.

⁴ EAWS41, p18.

⁵ See, for example: <https://www.theguardian.com/australia-news/2023/mar/04/drought-and-flooding-rains-the-murray-darling-basin-water-rights-balancing-act>



iii. EAWS41 states (as previous EAWS surveys did):

“Long-term trends are more informative for predicting population status than year to year fluctuations”.

The above critically important statement is **completely omitted** from *Considerations*. The above trend line suggests possible extinction by 2033 (possibly earlier if a catastrophic event occurs when the populations are further reduced).

Instead, GMA emphasize the recent increase in EAWS abundance index and the elevated estimates from the 2023 surveys of ducks in Victoria and the Riverina (discussed below). This is consistent with the approach that hunting lobby groups have used for years: emphasise any short-term increase in duck numbers and ignore the continuing long-term decline. However now they point to taxpayer-funded models (also discussed below) to assuage any concerns re “sustainability.”

A striking example of the focus on rebound rather than overall context can be found on page 22 of *Considerations* where a bar graph compares game bird abundance in EAWS survey Bands 1 and 2 (Victoria) for 2021, 2022 and 2023. The dramatic jump in 2023 is highlighted as “25 times” previous values. In other forums, shooters have referred to an “explosion” of duck populations. **However, GMA does not mention the context: 2021 and 2022 were respectively the fourth lowest and third lowest (all Bands combined) in 41 years of surveys, so coming off such a low base, any rebound will seem amplified.**

It is surprising that GMA does not always report the game duck abundance in these two Victorian Bands. Inexplicably, it never reports the game duck abundance in the other survey Bands. This suggests GMA has little concern about the impact of a Victorian shooting season on sustainability of game duck populations across eastern Australia.

GMA does regularly report on “all waterbirds” in each Band. For 2023, these are mostly in Victoria’s Band 2 and Queensland’s Band 8 (see page 19 of *Considerations*). Assuming game ducks also gather mainly in these regions, a 2024 shooting season in Victoria will negatively impact one of the only two population reservoirs of these birds.

GMA's *Considerations* is misleading in its presentation of a bar graph (at page 26) showing estimates of "absolute game duck abundance" from its own Victorian survey. This survey is discussed in 3.4 below and most (6 out of 8) of these species' estimates are considered unreliable by those who calculated them. A further set of "model-based" estimates – more accurate but lower – are not yet available.

Considerations includes nine pages of largely irrelevant and distracting information about "all waterbirds" – rather than game ducks – together with soil moisture and dam storages. The rebound for "all waterbirds" is welcome. However, the repetition of the rebound – separately for "all waterbirds" and then for game ducks - helps to distract from the following disturbing facts that are somewhat buried within the many pages of *Considerations*:

- i. EAWS41 shows the wetland area index is below (78% of) the long-term average.
- ii. Most waterbird habitat is confined to northern Victoria and central NSW (Bands 2 to 4).
- iii. The consequence (not mentioned by GMA) is that a Victorian shooting season will destroy ducks in one of the few remaining areas of refuge.
- iv. Some 40 per cent of wetlands (including dry wetlands) had no waterbirds at all.
- v. A three-year rolling index is imposed on the graph of game bird abundance (at page 23) to provide an "overall trend". There is no comment made, but this year it is well below the long-term average (about 75% of it). Last year GMA failed to note the rolling index was the lowest on record.
- vi. Breeding data is only provided for "all species" but in contrast to last year's boom, it is now below average. **Five non-game species accounted for 97% of the total breeding.** Most (73%) of the "all waterbirds" breeding was in Queensland (Band 9), with some in Band 4 and even less in Band 1 (Victoria). The critical issue of game duck breeding is dismissed with the following statement (at page 28):

"Little game duck breeding was recorded but this is not a reliable indicator of the extent of breeding."

As EAWS has been operating over more than four decades, it has monitored TRENDS in game duck breeding over many climatic cycles. Its report of "little game duck breeding" should not be dismissed. EAWS never claims to be a complete count. It provides indices that monitor trends, including:

- For "all waterbirds" there is long-term decline in key EAWS indices for waterbird abundance and waterbird breeding richness (number of species breeding). There is also long-term decline in wetland area (see page 30).
- Declines in wetland area are likely to result in declines in waterbird abundance, breeding, and breeding species richness (see page 31).

3.2 Concerns re misuse of "science"

The Victorian Government's [2017 review of Adaptive Harvest Management \(AHM\)](#) included a "State of the Art" discussion (at pages 5 - 7) which discussed that the task of modelling duck populations for the purpose of shooting them, is not mathematically, scientifically or politically easy.

Only one application of AHM⁶ had ever been evaluated, and a number of problems were identified. These included:

- i. failure to account for long-term environmental changes (land use; climate change);
- ii. a growing divide among stakeholders – the complex process is dominated by mathematicians and some others are calling for a return to “rule of thumb”;
- iii. limited ability to tailor harvest regulations to each species; and
- iv. that *“the fact that large differences in hunting regulations often resulted in small changes to average harvest rates”*. This was evidenced in Victoria’s 2023 season, as discussed further in 3.6 below.

A key point is that all AHM exercises have taken place in the northern hemisphere, with species that are increasing, unlike our game ducks which are mostly in long-term decline. For species that are naturally *increasing*, the inevitable inaccuracies of attempts to model bird populations will not affect their sustainability.

In Australia, however, attempts to use AHM are essentially experiments that put at risk the sustainability of our declining game duck species. It seems the hunting lobby may have persuaded GMA, as well as relevant Departments and politicians, that AHM will “take the politics” out of duck shooting, while omitting to mention the scientific limitations of such an approach and the threat it poses for sustainability. In our view, it does not remove the political conflicts – see discussion below (and also note the stakeholder division noted above).

Those who cling to computer models as infallible methods for ensuring sustainability of duck shooting may lack the scientific education to understand the purpose and limitations of modelling. Yet, everyday failures of modelling – from weather forecasts to economic forecasts to Covid forecasts – are commonplace. It is unreasonable to expect that modelling for duck seasons would be any more reliable. Given the limited quantity and quality of data available for ducks, such models are likely to be even less reliable.

3.3 The new Prowse modelling for the next 50 years

The taxpayer-funded Sustainable Hunting Action Plan 2021-2024 (**SHAP**) funded a research paper, [Conservation and Sustainable-Harvest Models for Game Duck Species](#) released by Dr Thomas Prowse (University of Adelaide) in July 2023. As recognized stakeholders, Animals Australia was not advised of this.

According to the DJSIR website:

“The research ... recommends a precautionary annual proportional harvest quota of 10 to 20% of the Victorian game duck population sizes estimated from surveys of each species in spring. Modelling suggests that this harvest level should be low enough to ensure populations of the studied species do not drop below 20% of their carrying capacity in any year, even when environmental conditions are unfavourable.”

However, the paper necessarily includes a wide array of assumptions (including the impact of climate change, the movement of duck species, and “carrying capacity”). Incredibly it attempts to extrapolate half a century into the future. It states in its section 1.2 (pages not numbered):

⁶ Based on Mallards in North America.

“For the purposes of this report, sustainable harvest management is defined as management with the following objective: To maximise the cumulative harvest over a 50-year period, under the constraint that populations are maintained above some minimum population threshold (i.e., some fraction of carrying capacity).”

The minimum threshold is arbitrarily selected as 20% of carrying capacity.

No other discipline – economics, medicine, climate science, etc – would extrapolate so far into the future and consider its projections reliable. Yet the proposed 10-20% cull is already being hailed by duck hunters as a guarantee of sustainability.

This research paper is a complex academic exercise which acknowledges the many assumptions employed and the many areas of uncertainty. It should not be used in the real world to set annual shooting quotas for game ducks that are already in long-term decline.

3.4 Victoria’s game duck abundance estimates

For four years (2020 - 2023) the Arthur Rylah Institute (**ARI**) has designed a (helicopter) survey and analysed the results for Victoria’s game duck population. Complex mathematical techniques are used, and two estimates are produced each year: a design-based estimate and a model-based estimate. **Each year, ARI’s report explains that the model-based estimate is more accurate. However, each year the GMA adopts the design-based estimate, which is higher.** Last year it was 20% higher (2.4m compared with 1.9m). This time, ARI has not yet worked out the model-based estimate, which will not be released until February 2024. Of grave concern is that GMA’s *Considerations* (at page 25) is already promoting the design-based estimate of 7.1m.

During the physical counting of the ducks, two independent observers provide separate counts. Rather than averaging the two figures, the higher count is always adopted: It is difficult to avoid the observation that GMA is keen to get the highest possible estimate for the duck population.

A procedure known as N-mixture modelling was developed in 2004 and since then it has been widely used in wildlife counts, including these Victorian duck surveys. But there has been serious academic criticism of this technique. *Link et al* (2018) commented⁷ that:

“Our attention to the N-mixture models is prompted by their obvious and critical dependence on assumptions in place of data. There is no such thing as a free lunch: extra data have been replaced with extra assumptions, and the assumptions are stringent. Small, undetectable violations of assumptions lead to substantial biases. Similar concerns regarding N-mixture models are being expressed by other authors...”

We note from [ARI’s preliminary report of the 2023 survey](#) that the physical count of only 121,000 game ducks (across eight species) was extrapolated to a population estimate of 7.1m.

We also note that according to ARI’s own criteria for accuracy (Coefficient of Variation not to exceed 0.15), the survey’s estimates are not reliable for six of the eight game duck species; Grey Teal and Chestnut Teal were the two exceptions⁸. Yet the total population estimate is derived by adding together these largely unreliable species estimates, leading to a risk of over-harvesting. This was one of the many criticisms in the [Kingsford-Prowse peer review of the survey in 2021](#)⁹.

⁷ Link, W. A., Schofield, M. R., Barker, R. J., and Sauer, J. R. (2018). *On the robustness of N-mixture models*. *Ecology* 99, 1547-1551. doi:10.1002/ecy.2362 See page 1551.

⁸ Refer Table 3; pages not numbered.

⁹ Refer comments (3) and (4) on the first page of the Kingsford-Prowse review.

There is no publicly available information about any follow-up independent peer-review to check on any rectification of concerns raised by Kingsford-Prowse.

3.5 Riverina duck surveys

These surveys also use the N-mixture modelling technique, and so are subject to the concerns raised above. These Riverina survey reports have not been independently peer-reviewed¹⁰.

An important consideration appears to have been overlooked by GMA's *Considerations*. Namely:

- i. Last year, the survey covered small dams only. To provide a valid comparison between years, estimates of duck populations should be compared only for small dams. The necessary break-down of information is provided in these survey reports.
- ii. When assessed in this way, a population decline is apparent on farm dams, with game duck population estimates being: 984,000 (2021); 888,700 (2022) and 478,700 (2023). The graph in *Considerations* (at page 27) is grossly misleading. Once again, GMA's bias is towards presenting a favourable picture to support another Victorian duck shooting season.

3.5 The Kingsford-Klaassen model (KK model) for bag limits

GMA and hunting groups have often mis-quoted the two scientists who designed this model, claiming that the science or the modelling recommended or supported a full-length season. For example, GMA's [media release announcing the 2022 season](#) stated:

“The full-length season was recommended based on harvest modelling by two experts in waterfowl ecology and population dynamics, Professors Klaassen and Kingsford.”

In fact, the modelling did not include season length as a variable. The decision to vary the bag limit but retain a full-length season was based on a judgement about human behaviour, namely that hunter participation does not change unless the season is drastically shortened. The concept of a full-length season every year was favourable to shooters, and it made the scientists' task easier in designing a model. But it is not based on science.

As we have noted in previous submissions, [the scientists acknowledged¹¹ that varying season length would also be a valid way](#) to regulate the “harvest” and the compliance task would be much less for a short season (shots outside the season would be easily heard.)

For 2023, the KK model predicted a bag limit of 4 birds a day and the GMA recommended an elongated 90-day season. The Minister drastically shortened the season to 35 days, which should – according to the scientists' projection of hunter behaviour change – have further reduced the “harvest” below the “sustainable” level intended.

GMA had previously promoted a 10% cull as “sustainable” even though there is no Australian evidence to support this claim. That target would equate to 240,000 bagged ducks (if the population estimate was 2.4m) or 190,000 bagged ducks (using the lower, more accurate estimate of 1.9m). The actual “harvest” calculated from a self-reported shooter survey was the usual average of 320,000 – way above the supposedly “sustainable” limit.

¹⁰ Correspondence from NSW DPI to another party.

¹¹ See pp 26-27 of the report from Kingsford/Klaassen.

If GMAs proposed 90-day season had gone ahead, the cull would have been even more excessive. This demonstrates that the KK model cannot be relied upon to deliver a “sustainable” harvest. **Large changes to the hunting rules in 2023 made no difference to the average harvest – similar to the AHM experience in North America.**

The KK model simply aims to replicate the pattern of decision-making over the last 30 years, during which game duck populations have continued a trajectory of decline. Like all models, this model makes assumptions to simplify its work, and one such assumption is that the season was a full-length season. In reality, half of those past seasons were shortened.

According to [GMA’s 2023 season report](#), its telephone survey revealed that 1.2% of active hunters (170 shooters) admitted to breaching the bag limit¹². Given this high occurrence of non-compliance, which appears to have carried no consequences for the offenders, it is likely that others breached the limit but did not acknowledge this.

Considerations reports that the number of hunted days was 17% above average, according to GMA’s hunter survey. This again contradicts the assumption that a drastic cut in season length will reduce hunter participation. It is unclear whether hunters chose to “talk up” their involvement knowing that the future of duck hunting is uncertain, or whether they actually increased their involvement. With minimal possible or actual independent monitoring of shooting and ‘bags’ it is clear that we can have no reliable information regarding how many native waterbirds are being killed and wounded each year by recreational shooters.

3.6 Removing an avoidable threat

A study [by Kingsford et al \(2017\)](#) reviewed EAWS data over the period 1983 - 2014, and found that habitat loss is the key driver of duck population decline. It also found a weak impact from hunting. Shooters use this study to claim that duck shooting is not a sustainability problem.

However, when species are at risk, it makes sense to remove any avoidable threats – such as recreational hunting.

It is important to note that hunting was not the prime focus of this study, and the impact of hunting was likely underestimated because:

- i. Half of the years under review were from last century, a period when duck populations appeared resilient to hunting losses¹³.
- ii. Duck harvest data across eastern Australia was unavailable for the study. Instead, the authors used proxies: the number of duck licences, and the NSW Riverina duck harvests. The number of duck licences does not allow for active/inactive shooters, nor does it capture the effect of modified or cancelled seasons.
- iii. Both of the above points will “dilute” or weaken any perceived linkage between hunting and duck population.

4. Impact on regional Victorians

We note that considerable (undisclosed) sums of taxpayer funds have been spent on the above-mentioned studies, yet no tangible action has been taken by GMA in order to comply

¹² See page 10.

¹³ *Scientific panel review of open seasons for waterfowl in New South Wales* / [panel members Richard Kingsford, Grahame Webb, Peter Fullagar], NSW National Parks and Wildlife Service, 2000.

with GMA's "guiding principles" obligations under s8A(e) of the GMA Act 2014, which requires that:

*"the principle of stakeholder engagement and **community participation**, which means taking into account **the interests of stakeholders and members of the local community** in implementing appropriate processes for stakeholder engagement".*

[emphasis added].

Many of our supporters live in regional Victoria and are concerned about GMA's lack of engagement with non-duck-shooters. They have serious concerns about cruelty, sustainability, community safety, and loss of local amenity. To our knowledge, GMA continues to ignore the impact of duck hunting on regional residents.

5. Conclusion

As demonstrated throughout this submission, recreational shooting of native waterbirds is neither sustainable nor humane. Our comprehensive and science-based submission to the Legislative Council Inquiry ([no.1590](#)) is included as **Attachment A**.

The issues that strongly support the position that recreational native duck shooting must be stopped forthwith include: wounding and disturbance causing suffering and egregious cruelty to birds; lack of shooter skill and knowledge; environmental / unsustainability issues (waterbird decline); waning participation; unnecessary public expenditure; regulatory failure; and subsequent withdrawal of social licence. Only some of these are highlighted above, based on the **'new' information provided in December 2023**.

In light of the above, including the information provided at **Attachments A and B**, there can be only one appropriate action to take. That is, recreational duck shooting in Victoria must be cancelled for 2024, and permanently.

Please confirm receipt of this submission.

Yours sincerely,



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8 May 2023

Parliament of Victoria
Select Committee on Victoria's Recreational Native Bird Hunting Arrangements
Parliament House, Spring Street
EAST MELBOURNE VIC 3002

Submitted online: nativebirdhunting@parliament.vic.gov.au

Dear Select Committee

***Submission by Animals Australia to the SELECT COMMITTEE ON VICTORIA'S
RECREATIONAL NATIVE BIRD HUNTING ARRANGEMENTS***

Animals Australia appreciates the opportunity to participate in this long overdue public Inquiry into duck and quail shooting.

Animals Australia advocates for a complete and permanent prohibition of recreational duck and quail hunting in Victoria as these practices raise serious concerns relating to:

- 1) Animal cruelty;
- 2) Biodiversity conservation;
- 3) Jurisdictional consistency;
- 4) Unnecessary public expenditure;
- 5) Regulatory failures and conflicts of interest;
- 6) Lack of due process;
- 7) Waning participation;
- 8) The high likelihood that the Wounding Reduction Action Plan (**WRAP**) will fail;
- 9) The withdrawal of social licence; and
- 10) Ongoing issues during the current 2023 season.

We outline these concerns in this submission and request the opportunity to give evidence before the Committee.

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- B** Extracts from GMA's *Guidelines for the Humane Dispatch of Downed Ducks*
- C** Shooter comments: GMA's live-trapping of ducks to measure wounding
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- H** GMA media release (22 March 2017): Illegal and unethical start to duck season
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- J** Environmental destruction and illegal shooter behaviour: eye witness account
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1. Animal cruelty

Duck and quail hunting involve animal cruelty. These activities cause unnecessary suffering, pain, fear and distress to animals. The only way to eliminate this cruelty is to permanently ban all recreational bird hunting.

Animals Australia's legal team has compiled a detailed dossier of well-documented cruelty complaints which have been submitted to GMA from 2016 to 2023 **provided at ATTACHMENT A**. It is unacceptable that GMA has not taken action under the Victorian *Prevention of Cruelty to Animals Act 1986 (POCTA)*, in respect of many of these complaints. Under POCTA, it would be illegal for a person to wound a duck in their backyard. It is incongruous that (other) legislation or Codes of Practice then allow that person to do this at a wetland.

The Victorian government has committed to a new modernised Act to replace POCTA. It has been proposed that the new Act will explicitly recognise the 'sentience' of animals; their ability to suffer, and to experience pain and distress. The killing and/or inherent wounding and maiming of native waterbirds through recreational shooting will then be an even more stark contravention of Victorian policy and legislation.

Although perhaps beyond the scope of this Inquiry, the same concerns about cruelty apply to the GMA's licensing of bird farms where paying guests shoot non-native game birds¹ with minimal (or no) supervision from GMA. Essentially these operations provide birds as target practice for untrained once-off visitors to take pot-shots. There is no enforceable regulation governing shooter behaviour at these farms. They operate under the radar. We urge the Select Committee to note that recreational shooting of birds also takes place at these bird farms and recommend that this activity be banned.

1.1 Wounding

We draw particular attention to the wounding of all birds, including those who are retrieved as well as those who are not retrieved². All wounded birds suffer pain, fear and distress, and it is likely that few wounded birds survive (e.g., death by starvation, predation, exposure to freezing winter conditions)³.

The GMA acknowledges that wounding is an unintended and unavoidable part of bird shooting. Shooters and the GMA do not prioritise the welfare of wounded birds left to suffer slow deaths, and humane relief is not provided to minimise their suffering. The task of search and rescue for wounded birds remains largely left to community volunteers including wildlife carers and vets, who spend weeks on the wetlands carrying out this task.

A GMA Board paper (October 2019)⁴ acknowledges that "*waterfowl wounding and animal welfare issues in hunting are a major concern in Victoria and Australia more generally*", and a GMA presentation by S. Toop and J. Hampton⁵ acknowledges that "*Duck hunting by shotgun unavoidably causes wounding of waterfowl due to insufficient pellet strikes that penetrate to vital organs or fail to immobilise the bird so it can be recovered and dispatched...Sub-lethally*

¹ Pheasant, partridge and introduced species of quail.

² Animals Australia does not accept the GMA's limited definition of "wounding". Animal welfare considerations dictate that any animal suffering a shot that is not immediately fatal, should be counted as part of the wounding rate, whether retrieved or not.

³ Van Dyke, F. (1981). Mortality in Crippled Mallards. *The Journal of Wildlife Management*, 45(2), 444–453. <https://doi.org/10.2307/3807926>.

⁴ DJPR FOI request 6662.

⁵ DJPR FOI request 20-48275.

injured birds survive whereas severely wounded birds will die due to: direct injuries sustained, inability to adequately feed, inability to avoid predators, [and] inability to thermoregulate... Wounding is not only an animal welfare but a sustainability issue”.

There are no legal requirements for shooters to retrieve wounded birds and minimise their suffering. As of 2018, the only requirement is that a shooter must make “*all reasonable*” efforts to retrieve a wounded bird before firing again. It is incongruous that a person can legally shoot in conditions or terrain that make retrieval almost impossible. The WRAP says that GMA’s Authorised officers will actively enforce game hunting regulations which require hunters to immediately recover downed game birds before continuing to hunt (2.4 on p13). This suggests that for the last five seasons (2018-2022) the GMA has not actively enforced this long overdue rule. Whatever the case may be, even if wounded birds are retrieved, retrieval methods (e.g., use of dogs) inflict further suffering.

There is strong agreement amongst key stakeholders and authorities that the suffering of wounded animals is a welfare issue that is inherent in bird shooting. For example, joining calls for a ban on duck hunting in Victoria, the Australian Veterinary Association ([13 February 2023](#)) stated –

“Hunting ducks with shotguns often results in non-fatal injuries, where the birds are hit with the outer cluster of pellets, but not retrieved. This results in an ethical animal-welfare problem, as the bird may live for a number of weeks with a crippling injury, receiving no veterinary treatment. We are calling on the Government to take swift action and follow the suite of other states and territories that have banned duck hunting altogether.”

1.2 Inhumane methods of killing

The GMA [Guidelines for Humane Dispatch of Downed Ducks](#) (2019) (“**the Guidelines**”) includes methods that GMA regards as ‘humane’ and ‘inhumane’ (see **ATTACHMENT B**). Observers have documented shooters routinely using inhumane methods of killing, and prolonging animals’ suffering. For example, the Guidelines advise that two hands should be used for cervical dislocation, but shooters have been observed routinely using one hand, while holding their gun in the other. Shooters have also been observed windwilling ducks (swinging them around by the neck). Often still conscious and suffering, animals are then stuffed in boxes, boats or belts.

1.3 Cruelty to parent birds and dependent young

Animals Australia has repeatedly raised concerns about parent birds and dependent young. Shooting of parent birds leaves behind orphaned young. In our 2022 submission regarding the 2022 Hunting Season considerations, a Victorian farmer provided an eye-witness account of “*baby ducklings without mothers that now have to fend for themselves...[they] will die over the next few days*”. The 2012 Regulatory Impact Statement (RIS) for the current hunting regulations⁶ (p29) posited that duck shooting seasons should be timed to avoid the vulnerable times of breeding and subsequent moult. GMA should therefore, as a minimum, adhere to the RIS. Animals Australia re-iterates our call on GMA to close wetlands when ducklings were present.

Harm is also being inflicted on the young of non-target species. Shooters are destroying swan nests to gain access to sites. For example, at Lake Bael Bael near Kerang on opening day of the 2022 season, [swan nests were destroyed by shooters](#). Police and GMA officials were

⁶ The Regulatory Impact Statement (RIS) for the *Wildlife (Game) Regulations 2012* can be accessed here: <https://www.vic.gov.au/regulatory-impact-statements-2012>.

present, but no one was held accountable. The following day, a solitary, distressed cygnet was found by a volunteer and [brought to a veterinary tent operated by Wildlife Victoria](#). The cygnet was “*only a few weeks old...weak, disorientate, and calling out for its parents who sadly, were gone*”.

1.4 Animal cruelty is occurring on private land

The majority of the cruelty occurs on private land. GMA has reported that 57% of the 2022 duck “harvest” occurred on private land, and 91% of the quail “harvest” occurred on private land. In Victoria there are no provisions to even notify the GMA of recreational hunting on private land. Consequently, there is no publicly available information about which private lands are favoured by shooters, and there is no transparency about the level of GMA patrolling of private shooting grounds. Hunting on private land has the potential for significant negative impacts on the amenity of neighbours (who apparently have no say in the matter). In NSW (where recreational bird hunting was banned in 1995), those hunting other species must obtain written permission two days prior⁷. In that way, hunting authorities are aware of the hunting locations and can supervise accordingly.

2. Biodiversity conservation

2.1 Population decline of hunted duck species

The long-running Eastern Australian Waterbird Surveys (**EAWS**)⁸, led by Director of the University of New South Wales Centre for Ecosystem Science Professor Richard Kingsford, have found unequivocal decline of hunted duck species. All eight game duck species are in sustained decline. The NSW Riverina duck survey report⁹ urges additional protection for 5 of these 8 game duck species – Pink-eared Duck, Hardhead, Chestnut Teal, Mountain Duck and Blue-winged Shoveler – which “*have not [sic] shown to respond predictably to changes in climate or only occur in low abundance*”. Although the EAWS reports include a separate time series graph for each of the game duck species, these are omitted from the *Considerations* commentary despite their importance.

Shooters often quote outdated research but contemporary data from EAWS shows that record abundance occurred in the 1980s, and long-term decline has followed. The Pink-eared Duck and Hardhead populations have collapsed and remained low during the last decade (**see ATTACHMENT L**) while all other species show long-term decline over four decades.

On previous occasions when we have sought information directly from EAWS, game duck breeding has been negligible (as it is again this year given that five non-game species accounted for 96% of observed nests).

GMA ignores the fact that with low rates of breeding, game duck populations are ageing¹⁰ and catastrophic failure of species is likely or perhaps already underway. GMA’s “*Considerations for the 2023 duck season*” (p24) said of its game duck abundance graph: “*the 3-year rolling (or moving) average ... is used to get an overall trend in a data set.*” It then ignored the fact that this rolling average for game duck abundance is now at its lowest point on record.

⁷ Gun Control Australia 2021, *Duck hunting laws in Victoria: Legal Factsheet*. A **copy is at ATTACHMENT E**.

⁸ Conducted by Professor Richard Kingsford and team (UNSW) for the last 40 years.

⁹ *2022-2023 Annual Waterfowl Quota Report to NSW DPI Hunting, NSW Department of Primary Industries*, Aug 2022, p11. These five species are not to be shot (as part of a bird control program at rice farms) unless there are extenuating circumstances.

¹⁰ *According to a follow-up email from GMA (S Toop, 29.12.2020) to Animals Australia the average lifespan in the wild is around 4 years.*

According to GMA's *Considerations* documents, the EAWS data showed game duck abundance fell by 2% in 2022 compared with the previous year, and the 2021 abundance was less than half (42%) that of 2020 (see **ATTACHMENT D**). This is despite the generous rainfall from successive La Nina cycles which have enabled non-game species to rebound¹¹. Game duck abundance across the eastern states is now the third lowest in four decades. If game ducks cannot recover even in favourable conditions, how is GMA's recommended approach to ongoing recreational shooting seasons "sustainable"? With minimal breeding of game duck species, continued shooting simply diminishes any hope of a rebound.

Shooters often use outdated quotes from Prof. Kingsford¹² when data suggested that duck populations appeared to show some resilience to hunting losses. However, Kingsford has changed his assessments based on subsequent data. For example, in 2006 he castigated the Victorian Government for holding a duck shooting season as the Millennium Drought gathered pace¹³.

More recently, shooters have tried to dismiss EAWS data which shows that the game duck hunting is unsustainable. Criticisms of EAWS are prevalent among shooters but all the following criticisms should have been rebutted by GMA:

- Shooters claim that EAWS does not cover ducks on farm dams but EAWS does cover farm dams;¹⁴
- Shooters claim that EAWS does not count all ducks but it covers 12.3% (almost one-eighth) of the land area of eastern Australia, flying across 10 broad east-west bands of 30km width, spaced evenly at every 2 degrees of latitude¹⁵. It is nonsensical to suggest birds somehow "hide" between, or "escape" outside, the broad grid of survey bands spanning one-third of the continent.
- Shooters claim that low counts in dry years are due to ducks spreading out to seek better habitat and low counts in wet years are due to ducks "dispersing" across multiple habitat options, but EAWS surveyed all the major wetlands (from 2010 onwards, including most Ramsar-listed sites) for the Murray-Darling Basin, and all major floodplains and lakes¹⁶. This counters the shooters' criticism that the birds spread out onto flooded areas and evaded the count.
- Shooters claim that the survey looks in the wrong places and is not fit for the purpose of deciding season settings. However, accepted methods to estimate animal populations do not have to count every individual. By covering the same large area in the same way each

¹¹ *Considerations 2023*, p21 and p30.

¹² For example, in the previously mentioned *Scientific Panel Review of Open Seasons for Waterfowl in New South Wales*, 2002, Kingsford et al. On p5 the review stated: "All scientific studies available to the review indicate that hunting has no effect on waterfowl populations." But the studies available to that review are now decades old.

¹³ See: <https://www.theage.com.au/national/bird-expert-attacks-duck-season-ok-20060313-ge1x67.html>.

¹⁴ Explicitly stated in the Kingsford-Prowse review of the new Victorian helicopter survey of ducks, https://www.gma.vic.gov.au/_data/assets/pdf_file/0003/819282/Game-duck-review-Kingsford-Prowse.pdf.

¹⁵ Braithwaite et al, 1985: *An Aerial Survey of Wetland Bird Fauna in Eastern Australia - October 1983*. Available at: <https://publications.csiro.au/rpr/pub?list=BRO&pid=procite:5c541e8f-7e20-4e8a-92d8-c6624dad2d07>.

¹⁶ Kingsford et al, *Aerial surveys of waterbirds in Australia*, Scientific Data, 2020: <https://www.nature.com/articles/s41597-020-0512-9>.

year for 40 years – including wet and dry periods – EAWS reliably monitors population trends which should inform settings, policies and legislative decisions.

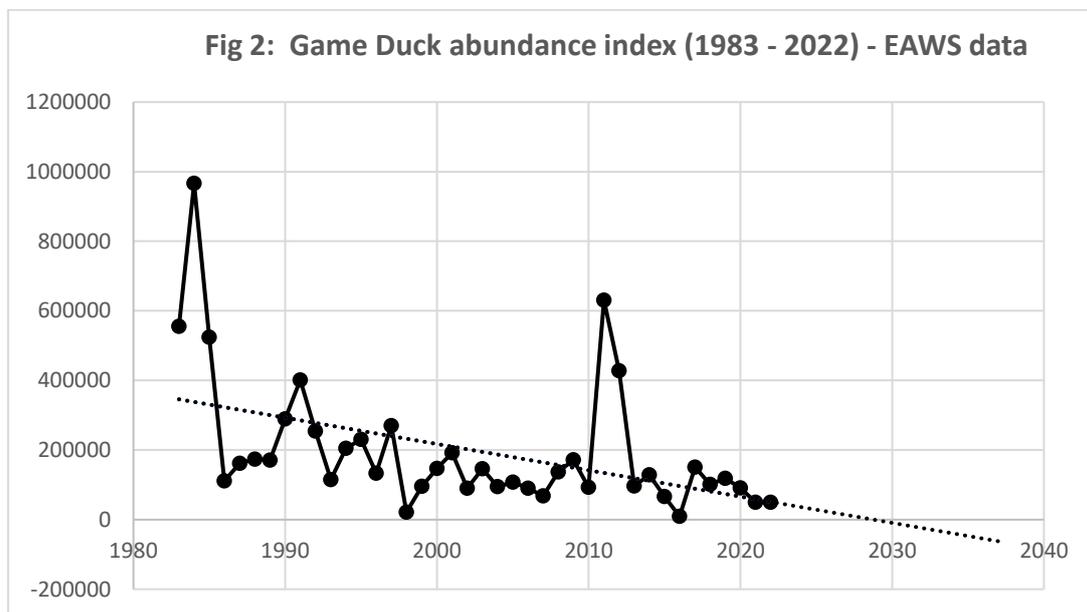
The 2023 Ministerial brief in the Sustainable Hunting Action Plan (2021-2025) states¹⁷:

“The Sustainable Hunting Action Plan commits to identification of sustainable levels of harvest, including a minimum population size below which harvest should not occur. This ‘sustainability window’ will be used in development of a harvest framework and strategy in consultation with key stakeholders. The Department of Jobs, Skills, Industry and Regions (DJSIR) is leading this work.”

To date, DJSIR has not briefed Animals Australia on this ‘sustainability window’ but if the minimum population size is set too low then this would become another justification to continue shooting native bird species under the guise of “sustainability.” Some years ago, Birdlife Australia recommended a baseline be set below which no hunting should occur. But they were ignored, and duck populations continue to decline, despite plentiful rain. In our view, it is too late to implement a “sustainability window.”

2.2 Possible extinctions by 2030

Each year we update and submit the following game duck abundance graph showing a clear and alarming downward trend in native game duck abundance (Figure 2). In their 2023 briefing to the Minister, GMA mentioned that our submission provided “a downward trendline graph (p.14) that extends to 2040”. In fact, the graph projects extinction by 2030.



The 2022 helicopter survey of Victorian ducks was delayed by floods and belatedly released in March 2023. Contrary to shooters’ claims that abundant rainfall correlated with abundant ducks, the estimated game duck population for Victoria had fallen to 2.4 million, a 17%

¹⁷ The Ministerial brief (re the 2023 shooting season) can be found at:

https://www.gma.vic.gov.au/_data/assets/pdf_file/0004/928264/GMA-Brief-to-Minister-2023-duck-season-recommendation.pdf.

decrease. The GMA tried to explain away the decrease¹⁸, rather than focus on the likelihood that the traditional link between abundant rains and abundant ducks is no longer applicable.

GMA's advice to Minister Thomas for the 2021 season said that the modified season, "allows duck populations to recover when environmental conditions improve." Clearly that advice was ultimately incorrect.

2.2 Misuse or misrepresentation of scientific evidence to back claims that duck shooting is 'sustainable'

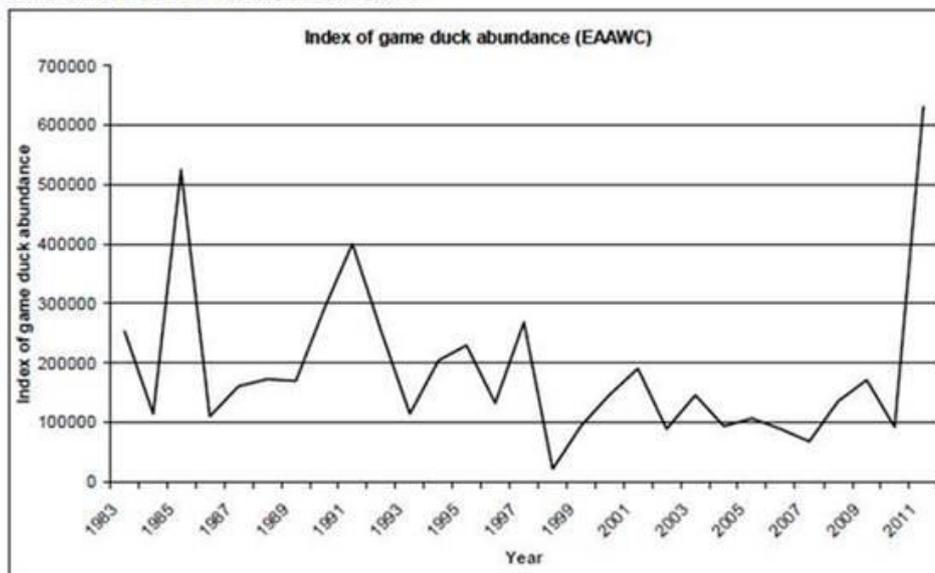
2.2.1 Baseline data

Concerns about the misuse or misrepresentation of scientific data date back to at least 2012 when a [Regulatory Impact Statement \(RIS\)](#) was prepared by Game Victoria to defend what became the *Wildlife (Game) Regulations 2012*¹⁹.

The RIS mis-reported survey data from EAWS to effectively conceal the long-term decline of native duck populations [Fig 6, p35 of the RIS (below)]. Referring to the falsely reported figures, the RIS repeatedly claimed that duck shooting is "sustainable" because the 2011 game duck abundance was (allegedly and incorrectly) said to be the highest on record. To back up these false claims, the RIS presented a graph (Figure 1) in which the peak abundance of the 1980s had been removed and replaced by erroneous data. According to Kingsford's survey data, in 1984 the game duck abundance figure was 966,292 and in 2011 it was only 630,470. The 1980s peaks in 'game' duck numbers should have been the baseline.

Instead, the current hunting regime and its enabling regulations are based on the falsified premise that populations peaked in 2011 (erroneous Fig.6 below). This represents a failure to account for long-term trends that indicate shooting has depleted game duck populations.

Figure 6: Index of abundance of game ducks as recorded during the Eastern Australian Aerial Waterbird Count



¹⁸ See: <https://www.gma.vic.gov.au/media-releases/2023/victorias-2022-aerial-duck-survey-results>.

This media release suggests the Victorian ducks may have flown to NSW floods or be 'dispersed' across temporarily flooded areas of Victoria that were not surveyed.

¹⁹ Those responsible for the 2012 RIS transitioned to key roles at GMA.

Fig 1. RIS (p36) graph showing erroneous data for the 1980s; the RIS then claimed that duck hunting was sustainable because abundance supposedly peaked in 2011, whereas EAWS data indicates it peaked in the 1980s.

2.2.2 The Kingsford-Klaassen (KK) model

The KK model, developed by Professors Kingsford and Klaassen, has been referred to by the GMA as “*the best science presently available to assist with objective decision-making on annual duck season arrangements*”²⁰.

Animals Australia has previously provided the Victorian government with details of the shortcomings of the KK modelling (much of it detailed by its authors). In summary, the KK model has not been peer-reviewed and continued over-reliance on it is a concern because:

- The KK model does not consider biodiversity (refer to FFGA obligations);
- The KK model output is a bag limit, and it does not specify species;
- The KK model relies on several indices that cannot reliably distinguish between a cancelled season and a restricted season. Its 2023 predictions rely on two of these flawed indices (iPGC and tfVicC); and
- Successive versions of the KK model show that it is easily tweaked to appease shooters.

It is our view that GMA misled Ministers regarding the 2022 season by stating²¹ that “*the KK [model] recommends a full-length season*”. Hunting groups also erroneously claim that “*the science supports a full season*”. However, the KK model is the only model that addresses such arrangements, and it does not provide support for a full season. Indeed, season length is not even a variable in the model. In one of their earlier papers²², Kingsford and Klassen, stated –

“We were asked to advice [sic] on the social, economic and ecological costs and benefits associated with reducing either season length or bag limits in relation to reductions in harvest.... If recreational hunters aim for a fixed seasonal effort that would translate into a fixed number of days of hunting in each year, as suggested by the data available to date, limiting daily bags rather than season length might be more effective.” [emphases added]

It seems GMA asked the scientists to choose between modifying season length or bag limits – without giving them the option to vary both. In responding to stakeholder queries²³, they stated:

“Research (including analyses of hunters’ behaviour in Victoria) indicates that manipulating season length is less effective than modifying bag limits. But that indeed does not invalidate it as a management option. To be effective season length will have to be drastically modulated...The point [that compliance monitoring is easier/cheaper for a shorter season] regarding enforcement load is valid.” [emphasis added]

²⁰ Brief 2022.

²¹ GMA’s Ministerial brief (18.1.22) is available from <https://www.gma.vic.gov.au/hunting/duck/duck-season-considerations/2020-duck-season-considerations> Refer p1.

²²Kingsford and Klaassen, 2021, op. cit.

²³ KK N21 (pp26-27).

It appears that GMA opted for a long season (*with the associated less effective enforcement*²⁴) and commissioned a model that only varies bag limits. It is therefore misleading to claim that “the science” supports a fixed-length full season every year.

This is unlike the last thirty years when season length was one of the levers that could be used (in combination with bag limits) to reduce the cull. During the thirty years of data (1991-2020) used to derive the KK model, season lengths varied from zero (four cancelled seasons) to the default setting of 87 days, but in one half of those years, the season was shortened (see Table 1 below).

Table 1: Shortened season lengths for half of the period (1991-2020) used by KK to derive their model.

Year	Shooting days
1995	0
2003	0
2007	0
2008	0
2020	38
2009	49
1997	58
2004	58
2019	65
1992	72
2010	72
1993	73
1991	76
2015	80
1994	86

Given this variability in season length for fifteen of the thirty years on which the KK model was developed, there seems no reason why season length cannot be drastically shortened, along with bag limits, as a further precaution to help safeguard biodiversity.

We strongly submit that on environmental grounds, season cancellation is necessary to safeguard of vulnerable targeted waterbirds (game birds).

GMA’s reliance on the KK model to adjust bag limits while recommending a full-length season in 2022 has already been shown lacking and “unsustainable”. Game duck abundance continued to decline through 2021 and 2022, despite a rare period of successive La Nina events when non-game species recovered.

By following the predictions of the KK model, GMA facilitated the slaughter of 262,567 ducks last year and the crippling of tens of thousands more.

²⁴ It is easier to monitor compliance when the season is short, as the sound of gunshot is easily heard outside the legal period.

While the 2022 harvest fell within the GMA's 10% target of the ARI helicopter survey estimate, the wounding losses were not factored in²⁵ and the real-world result was continued decline of species, as shown by all three subsequent surveys (EAWS, the Riverina survey and the Victorian helicopter survey of ducks).

It is a travesty to suggest the KK model will ensure "sustainable" duck shooting seasons.

2.2.3 Adaptive Harvest Modelling (AHM)

Shooters have (seemingly) successfully persuaded government to invest in "Adaptive Harvest Modelling (AHM)" to supposedly "take the politics out of duck shooting" but a 2017 review noted a range of difficulties with AHM in the Australian context²⁶.

In other countries (e.g., USA) where AHM has been used, it did not remove the politics or please stakeholders. Rather, it became an opaque academic project while stakeholders pleaded for a simpler way.

A more objective assessment would have noted the difficulties and vagaries of AHM for Victorian bird shooting, called out the false hope of pursuing AHM to "remove the politics" and saved Victorian taxpayers a lot of money.

We are deeply concerned by the manner in which GMA has presented some of the relevant scientific reports to justify continued taxpayer funding of more research to support the recreational killing of native waterbirds. Examples include its apparent misunderstanding of the EAWS, the new Victorian helicopter survey, and the KK modelling for season settings. It is ill-advised for non-scientists to apply quantitative results without an appropriate understanding of their limitations and sources of error.

Animals Australia believes that GMA should be asking key questions, including:

- How comprehensive and reliable is this data?
- Is the species in decline?
- Is the species breeding sufficiently to replenish stocks?
- How can we reverse the rapid and continuous decline of species?
- What are the likely sources of error?
- How reliable are these estimates and predictions?
- What were the assumptions built into the modelling and are they valid?
- How accurate is the data that was fed into the model?
- Have the projects been peer reviewed?
- Have any concerns been remedied, and if so, have the improvements been independently assessed?

2.3 Failure to account for cumulative threats

Australian native wildlife, including waterfowl, face multiple ongoing threats (e.g., large-scale changes in land use, climate change), which increases the imperative to reduce the threat of recreational hunting.

²⁵ Wounding losses will not be factored in until 2026, according to 4.3 in the WRAP.

²⁶ *Towards the implementation of adaptive harvest management of waterfowl in south-eastern Australia*, ARI 2017 pp5-7. Available at:

https://www.ari.vic.gov.au/_data/assets/pdf_file/0035/576917/ARI-Technical-Report-284-Towards-the-adaptive-harvest-management-of-waterfowl-in-south-eastern-Australia.pdf.

For many years GMA quoted a 2000 report²⁷ (based on last-century data) as evidence that hunting does not impact game duck abundance. At the time that data was collected, game duck populations appeared to show resilience. However, native ducks can no longer withstand the cumulative pressure of hunting in addition to other threats.

The KK model does not account for cumulative threats to waterfowl today. Decisions about shooting and changes to our environment have destroyed the resilience of game duck populations, pushing several species to the brink in recent years.

2.4 Shooting non-game (protected) species

Shooters often illegally shoot non-game (protected) species, and species officially listed as threatened in Victoria. The *Wildlife Act 1975* provides serious penalties for shooting protected or threatened waterbirds, but these have never been imposed.

2.5 GMA fails its obligations under the Flora and Fauna Guarantee Act 1988

Section 4B of the *Flora and Fauna Guarantee Act 1988* (FFGA) requires that when performing functions that “*may reasonably be expected to impact on biodiversity*”, Ministers and public authorities must give “*proper consideration*” to the objectives of the FFGA, which include:

*“(a) to guarantee that all taxa of Victoria’s ...fauna... can persist and improve in the wild and retain their capacity to adapt to environmental change; and
(b) to prevent taxa and communities of ... fauna from becoming threatened... and to recover threatened taxa and communities so their conservation status improves; and
(c) to protect, conserve, restore and enhance biodiversity... and
(d) to identify and mitigate the impacts of potentially threatening processes to address the important underlying causes of biodiversity decline...”*

It is our strong view that GMA fails to give “proper consideration” to FFGA objectives (a) to (d) listed above.

Since GMA was formed in 2014, two game duck species – the Hardhead and Blue-winged Shoveler – have joined Victoria’s Threatened list (contrary to (b) above). Despite shooters often claiming to be “conservationists”, they are actively working to have these species removed from the threatened list. Despite being listed as threatened species, these species they are still listed as “game” birds meaning there are lower penalties for shooting them. For threatened species not listed as game, there are more onerous penalties.

In 2021, GMA failed to recommend a ban on shooting Hardhead, despite knowing this species had met the “threatened” criteria and would be officially listed as threatened later that year. That season, GMA’s harvest report estimated that 61 Hardhead were bagged, and a 30% wounding rate suggests ~80 threatened Hardhead ducks were maimed or killed. An eye-witness account (name and contact details provided) describes the shooting of threatened Blue-winged Shovelers –

“Within the first hour of shooting at Lake Bael Bael (Kerang) in 2022, while police and GMA officials were present, two Blue-winged Shovelers were struck and abandoned – one maimed, the other dead. Volunteers retrieved them, and the wounded bird was x-rayed by volunteer vets then euthanised as its injuries were too great for rehabilitation. No shooter was held to account.”

²⁷ *Scientific panel review of open seasons for waterfowl in New South Wales*, Kingsford et al, Nov 2000.

If GMA was actively surveying to check for threatened species prior to the season opening (consistent with its obligations under the FFGA listed above), this wetland should have been closed to shooters. Despite clear and serious declines of all eight game duck species, GMA's "sustainable hunting" approach employs a new Victorian-only duck survey and a new computer model that even GMA acknowledges lack sufficient accuracy to cater for individual species – which are the essence of biodiversity.

In April 2023, the presence of critically endangered Orange Bellied Parrot (**OBP**) at Lake Connewarre on Victoria's Bellarine Peninsula was confirmed. Despite recommendations to close the entire wetlands to protect OBP from disturbance by shooting activity, only the southeast shore of the lake was closed. Shooters are permitted and present in other areas of the wetland.

Victoria has many wetlands and waterways available for duck shooting, exposing many threatened species to harm. The thresholds for the triggering management actions (e.g., wetland closures) are far too high to offer effective protection. The GMA is also intransigent re: requests to close certain wetlands to duck shooting either for public safety reasons or to provide a much-needed sanctuary for birdlife. GMA claims to have no role in such matters and requests are passed between GMA and the former DELWP²⁸ and back again. Regional residents complain of getting nowhere with both agencies. Yet under section 6 of the GMA Act, notably Section 6(e)(iii), it is clear that closure of wetlands is the responsibility of the GMA

Section 6(i) – to make recommendations to relevant Ministers in relation to—

- (i) game hunting and game management; and ...
- (ii) declaring public land open or closed to game hunting, open and closed seasons and bag limits; and
- (iii) the management of public and private land as it relates to game and their habitat...

Over the last three shooting seasons, only five wetlands have been closed to protect two threatened species²⁹. Despite previous warnings about the inefficacy of partial closures³⁰, GMA made a partial closure of one wetland purportedly to protect two (unlisted) species engaged in colony breeding.

With the Inquiry now underway, fifteen wetlands have been closed or partially closed this year to protect birdlife. This is a welcome uptick compared to other years but is likely still insufficient to protect threatened species from ongoing decline. Closures have been too few, too delayed and too inconsistent.

Under section 4A of the FFGA, decisions, policies and programs must (*inter alia*) give proper consideration to:

- “(b) the potential impacts of climate change;*
- (c) the best practicably available information relevant to biodiversity;*

²⁸ Now Department of Energy, Environment and Climate Action. It will be referred to as **DEECA** hereafter in this submission.

²⁹ GMA (2019) 'Assessing waterbird susceptibility to disturbance by duck hunters in Victoria'.

³⁰ "Partial closure ...did not prevent [hundreds of] Freckled Duck being [illegally] shot by hunters....If wetlands are partially closed, there is a risk, especially on opening weekend, that the disturbance from hunting on the part of the wetland open to hunting will cause birds such as Freckled Duck to move into the open area. It may take several days for birds to recognise the closed part of the wetland as a place of refuge. Thus, partial closures probably provide a lower level of protection than full closures for some vulnerable non-game wildlife such as Freckled Duck" – ARI Technical Report No.135 (re the 1993 Duck Season in Victoria).

(d) the precautionary principle, such that if there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation;
(e) enabling public participation...”

Contrary to s 4A(b) of the FFGA, GMA’s annual *Considerations* documents (in relation to duck season settings) demonstrably does not give “proper consideration” to the potential impacts of climate change despite ample evidence that climate change is a major threat to species conservation and should be central to considerations. Failure to account for climate change impacts is contrary to the Andrews government’s acceptance of the reality of climate change and stated commitment to climate action. GMA’s consistent failure to acknowledge climate science and its application to waterbird management is contrary to GMA’s obligations under the FFGA.

Contrary to s 4A(c) of the FFGA which requires use of best available information, the GMA ‘Considerations’ document (provided to stakeholders) focuses on breeding data for “all waterbirds” rather than breeding of the game ducks which are hunted.

Contrary to s4A(d) above, GMA has consistently failed to heed submissions which advocate for the precautionary principle (i.e., cancelling the season or protecting a species) in light of climate change and species decline. Contrary to the precautionary principle, GMA (and its predecessor, Game Victoria) have never recommended a season cancellation. They have been responsible for 12 contiguous seasons (2012-2023) which has given game ducks no opportunity to recover, and this is reflected in the sustained decline of populations. Despite repeated requests from key stakeholders (e.g., Birdlife Australia) , GMA has not adopted a precautionary approach until there can be confidence in a restored and continuing abundance of duck populations.

Contrary to s4A(e), rather than genuinely enabling “public participation”, GMA imposes an unreasonable timetable on stakeholders: a mere two weeks over Christmas and New Year is given for detailed submissions from key stakeholders. This results in failure to include input from key stakeholders, such as Birdlife Australia. Furthermore, despite government moves towards “inclusiveness,” GMA has never consulted the more than 99% of Victorians who are not duck shooters, regarding the economic, social and environmental impact of duck shooting. It is difficult to see how GMA has complied with its legal obligations (s6 and s8A) in this regard.

By every measure, GMA’s “management” of duck shooting has failed the test of “sustainability” and is contrary to its responsibilities under the FFGA.

2.6 The proposed 10% cull is not sustainable

GMA has suggested a 10% culling figure. In addition to concerns about animal cruelty and population declines (as outlined above), we have numerous concerns about this figure:

- **Lack of supporting evidence** – The ARI report gives no biological or environmental justification for a 10% cull. For the 2022 season, GMA seized on and publicly used the ARI report’s 2.94 million gamebird abundance estimate, making no mention of its uncertainty³¹. Applying a 10% cull to this figure gives a target of 294,000 ducks permitted to be bagged, compared with the season’s actual (shooter self-reported) toll of 262,567 plus (inevitably) tens of thousands of crippled/unretrieved birds. A 30% wounding rate would result in 79,000 wounded so the total loss far exceeds even the planned 10% cull.

³¹ See: <https://www.gma.vic.gov.au/media-releases/2021/second-helicopter-survey-provides-new-data-on-victorias-game-duck-populations>.

- **A recipe for continued decline** – A 10% cull will guarantee no season is ever cancelled, as shooters can kill a tenth of whatever birds are left, until virtually all birds are lost.
- **Contrary to FFGA** – This strategy is completely contrary to the FFGA, as discussed above.
- **Evidence of declines with a 10% quota** – A 10% quota has been adopted for the three most abundant game species during the NSW Riverina duck cull over rice farms. The latest (2022) NSW duck survey shows a marked fall in abundance, consistent with EAWS trends. This is significant, given extended La Nina periods, and GMA’s previous advice to the Minister that the NSW Riverina duck populations were supposedly on the brink of “recovery”³². In a Ministerial brief in support of a 90-day season 2023, GMA has attempted to mislead the Minister by dismissing this significant NSW drop in game bird abundance³³. GMA made false claims that the Riverina drop can be explained away by a change in survey coverage even though the findings of a decrease in abundance are sound.
- **Lack of applicability in the Australian context** – This figure has been borrowed from overseas where it is used for species that are increasing (unlike our game ducks). No evidence has been provided that it is or will be sustainable under Australian conditions.

3. Jurisdictional consistency

As the Victorian government has stated, duck and quail shooting are “*increasingly contested*” in Victoria, and the State is lagging behind other Australian jurisdictions.

On animal welfare and conservation grounds, and community opposition, these activities were banned decades ago in Western Australia (1990), New South Wales (1995) and Queensland (2005) and have never been permitted in the Australian Capital Territory (ACT).

Duck and quail hunting are illegal across almost two-thirds³⁴ of our continent, and for almost two-thirds of the Australian population, yet inexplicably are still permitted in Victoria. A prohibition on recreational duck and quail hunting in Victoria is long-overdue to bring it in line with other Australian jurisdictions.

4. Unnecessary public expenditure

While there is little transparency about total government funding to hunting and shooting in Victoria, it is clear from publicly available figures that millions of taxpayer dollars are being wasted despite current budget pressures.

³² GMA’s Ministerial brief in support of the previous (2022) shooting season can be found at: https://www.gma.vic.gov.au/_data/assets/pdf_file/0008/844613/Min-Brief-GMA-rec-2022-duck-season-inc-attachments-Redacted-copy_redacted_AS.pdf. It made much of a perceived “recovery” in the Riverina, mentioning this no less than three times as a precursor of likely “recovery” elsewhere as habitat improves. Our 2022 submission had warned the Riverina “recovery” should be seen in context: duck numbers had only returned to their 2016 level (when EAWS found game duck abundance at a record low). Our caveat was ignored, and the Minister was subsequently misled.

³³ *Considerations 2023* (p27).

³⁴ As at 30 June 2022, recreational duck and quail shooting was illegal in WA, NSW, Qld and the ACT, representing 64% of our population and 66% of our land mass.

At **ATTACHMENT F** we set out information obtained through research and FOI requests. This information shows that the direct funding from the current government (for GMA, SHAP, gun clubs and cleaning-up lead pollution near shooting ranges) exceeds \$70 million (see **ATTACHMENT F** for relevant documents obtained under FOI). This is likely an under-estimation because we have been unable to trace all public funds going to academic institutions, ARI and other government agencies in collaboration with GMA. GMA's *Research Strategy 2020-2024* makes clear that university research funds, provided by the taxpayer, will be used³⁵. Taxpayers have a right to know how much they pay towards hunting and shooting, and we query why this has not been disclosed.

Taxpayers, the majority of whom do not support duck shooting, are unwittingly paying for erroneous and resource intensive programs for shooters, activities to support hunting, and costly junkets. These are all inappropriate uses of public funds.

4.1 Expensive and ineffective programs for shooters

GMA has spent years and many thousands of dollars developing programs and materials for hunters. For example: Victorian Hunting Manual³⁶; Shotgunning Education Program (**SEP**); Gamebird Hunting Essentials Masterclass; marketing surveys to improve attendance at SEP/ Masterclass training that is now defunct due to lack of attendees; trapping and testing of ducks to study wounding; social research to determine why duck shooters adopt behaviours that increase wounding; and now the ongoing development and implementation of the WRAP.

Participation rates in these taxpayer funded programs for hunters are low. In December 2020, GMA acknowledged that fewer than 200 of the 25,000 licensed duck shooters had completed the SEP or Masterclass³⁷.

The programs are ineffective. A GMA [survey of hunter knowledge \(2020\)](#)³⁸ found duck shooters generally scored worst among all game hunters in respect to level of understanding of hunting laws, species recognition, best practice to minimise wounding, and humane treatment of wounded waterbirds. The WRAP proposes to invest yet more money on materials that have not and are highly unlikely to change shooter attitudes or behaviours.

4.2 Highly resource intensive activities to no end

Given the very small number of shooters, a disproportionate amount of public funding is being spent on highly resource intensive activities to placate the hunting lobby.

The WRAP now acknowledges that the helicopter surveys, upon which GMA recommended bag limits be significantly increased, had unacceptably high error rates/lacked sufficient accuracy. Furthermore, costly projects aimed at reducing the incidence of wounding are a waste of taxpayer funds because wounding is an inherent animal welfare issue that cannot be satisfactorily mitigated.

³⁵ GMA Research Strategy 2020-2024, especially its sections 3.2 and 6.3:
https://www.gma.vic.gov.au/_data/assets/pdf_file/0003/610986/GMA-Research-Strategy-2020-2024.pdf.

³⁶ *Game Hunting in Victoria: A manual for responsible and sustainable hunting*:
https://www.gma.vic.gov.au/_data/assets/pdf_file/0010/499096/Game-Hunting-in-Victoria-2nd-edition.pdf.

³⁷ Email from GMA (S Toop) to Animals Australia, 29.12.20.

³⁸ *Summary report of hunters' knowledge survey findings*, GMA, Dec 2019:
https://www.gma.vic.gov.au/_data/assets/pdf_file/0007/614194/GMA-Hunters-Knowledge-Survey-Report.pdf.

4.3 Unnecessary replication

In some cases, activities are patently unnecessary as they replicate existing work by other government agencies. It seems that when science fails to deliver results favourable to duck shooting, shooters pressure GMA into funding ‘alternative’ projects to distract from the “inconvenient truth”.

Examples of unnecessary replication include:

- **Chemical contaminants** – The GMA is testing avian blood samples for chemical contaminants even though the Environment Protection Authority (EPA) has already tested for these compounds and found unacceptable levels of lead and per- and polyfluorinated alkyl substances (PFAS) contamination in ducks; and
- **Helicopter surveys** – GMA commissioned a new aerial survey of ducks in Victoria. The first survey report ignored the movement and migration of ducks and showed a wide margin of error (Ramsey 2021)³⁹. Peer review⁴⁰ of the survey identified several additional sources of potential error that would lead to an over-estimate of abundance, of concern as over-estimates can lead to over-harvesting. The WRAP now considers this population estimate to be so unreliable that GMA cannot calculate the “crippling ratio” in 2022. It claims the population data won’t be good enough until 2025. (*As outlined in 1.5.8 of this submission, we calculated the crippling ratio for 2022 and it is damning, >80% for first-year birds*).

4.4 Taxpayer funded nest boxes to attract birds for hunters to shoot

FGA Geelong recently received a \$48,000 grant from the Sustainable Hunting Action Plan (SHAP) to build 300 nest boxes (also known as hen houses)⁴¹. FGA’s most recent annual report⁴² notes that its Wetlands Environment Trust (a tax-deductible charity) has installed over 200 hen houses in the FGA’s private wetlands at Heart Morass (near Sale in Gippsland) and Connewarre (near Geelong). These sites have become major shooting zones.

In addition, “a *Parks Victoria Letter of Collaboration and subsequent population of the Park Connect system with our volunteers supports the installation of several hundred in state game reserves and the like in coming years*”.

It is arguable whether the installation of nest boxes at these particular sites constitutes conservation or taxpayers paying to attract birds to certain sites for hunters to shoot.

4.5 Junkets

In March 2020, as the global pandemic gathered pace, two GMA executives flew to Denmark at a cost of \$16,941.86 to taxpayers.

³⁹ *Abundance estimates for game ducks in Victoria*, Ramsey and Fanson, ARI, April 2021.

⁴⁰ Peer review by Prof Kingsford and Dr Prowse, op. cit. (A superficial “review” had earlier been provided by a non-mathematician.)

⁴¹ SHAP grant to Geelong FGA to build henhouses: <https://djsir.vic.gov.au/game-hunting/action-plan/grants>

⁴² Field & Game Australia annual report 2021-22, p14 and p16
<https://cdn.revolutionise.com.au/cups/fieldandgameaus/files/pn8z2zowbbivrhma.pdf>

From 3 to 13 March, the trip⁴³ comprised 4 days of air travel/stopovers, 2 days of talks with Danish hunting officials, 3 days of touring, and 2 days of unsuccessful goose-catching (Danish wounding monitoring).

Although the subsequent report contains useful information about the regulation of hunting in Denmark, most, if not all, of that information could have been obtained by email or via online meetings.

We question the legitimacy of this public expenditure as well as the applicability of the Danish approach to wounding reduction (see section 8. The high likelihood that the WRAP will fail).

4.6 Lack of cost-benefit analysis

Taxpayer subsidies and direct funding of hunting has been justified by the spurious claims about the “economic benefits” of hunting. A key issue is whether this generous taxpayer funding provides “value for money” because no cost-benefit analysis has even been done for recreational native bird hunting.

The 2017 Pegasus report⁴⁴ criticised GMA for its one-sided promotion of the “economic and social benefits” of hunting –

*“...the GMA’s general power to conduct research appears to have been applied to **promote one side of a complex debate about the economic and social benefits of game hunting**. The GMA regularly draws in its public and internal documentation to an assessment of the economic benefits of game hunting prepared by the former Department of Environment and Primary Industries (DEPI) (2014) and provides a copy of the report on its website. The Hunting Manual, for example, claims that hunting generates hundreds of millions of dollars of direct and indirect economic activity...*

*The findings of the DEPI study **have been challenged by other research bodies** ([Parliament of Victoria Environment, Natural Resources and Regional Development Committee 2017](#), p 91). The GMA ... do not acknowledge the criticisms that have been made of this study or provide references to studies that present other conclusions. It is reasonable, given the nature of GMA Act, for the GMA to promote safe and sustainable hunting, but to assert that duck hunting contributes to the social, economic and environmental well-being of the state, and to seek to achieve this as a stated goal of regulation, seems to **move the GMA beyond its primary role as a regulator into an advocacy and promotional role for the game hunting activity that it is charged with regulating.**” [emphases added]*

GMA and the previous hunting regulator (Department of Environment and Primary Industries, henceforth “DEPI”) commissioned hunter surveys in 2019 and 2013 respectively⁴⁵ to estimate the supposed “economic benefits” from hunting. Consultants, RMCG, who have also undertaken hunter surveys in NSW and nationally, undertook the work. Their findings should not be used as sole justification for the continuation of duck and quail shooting as even the report authors acknowledge that their work does not constitute cost-benefit studies “and should not be used to favour one activity over another (or doing nothing)... Techniques such

⁴³ Travel itinerary from FOI request DJPR 6662.

⁴⁴ Op.cit., p14.

⁴⁵ The 2013 hunter survey can be found at: https://www.gma.vic.gov.au/_data/assets/pdf_file/0010/481717/Estimating-the-economic.pdf, and the 2019 hunter survey can be found at: https://www.gma.vic.gov.au/_data/assets/pdf_file/0006/852594/v.4Economic-contribution-of-recreational-hunting-in-Victoria-accessible.pdf.

as cost benefit analysis, which express the relationship between the benefits to society and the costs incurred as a result of the action, are more appropriate...”

Animals Australia has engaged an economist and a mathematician to review these reports. Key flaws were identified, leading to seriously misleading and inflated results. Concerns include:

- The survey was completely based on self-assessment by hunters, with no evidence sought or provided to back up their claims;
- Respondents opted in, rather than being randomly selected, so the results are biased towards the keener hunters (inflating the results, rather than being representative of all hunters);
- The results are so inflated that the average expenditure per duck bagged⁴⁶ was an incredible \$235 per duck in 2013, increasing to \$266 per duck bagged in 2019;
- Many items of expenditure (e.g., food, alcohol, vehicle, vehicle maintenance) would be purchased whether hunting or not;
- The figures for game hunting (duck, quail, deer) are further inflated by allocating all off-trip expenditure to game hunting and none to non-recreational hunting;
- There has been no publicly available peer review of these surveys. The 2023 submission to GMA from Wildlife Victoria⁴⁷ raised concerns about potential conflicts of interest and the risks of using the same contractors all the time; and
- Only the net benefit is relevant as hunters would spend on other things if duck shooting was banned:
 - Other states found no economic loss when they banned duck shooting⁴⁸;
 - None of these studies considers the case where other forms of hunting remain but duck shooting ends; and
 - Pro-hunting politicians, hunting groups and the GMA focus on the gross expenditure or GSP, and often quote the figures for all types of hunting (including non-recreational hunting) when trying to promote duck shooting.

The GMA has ignored pleas from regional residents for a cost-benefit study, taking into account negative effects of bird shooting (e.g., noise pollution, disruption to families, anxiety in children, emotional distress and impact on mental health, stress to animals, trespass on property (biosecurity risk); damage to wetlands, decline of species, loss of tourism, taxpayer subsidies for hunting/shooting, etc).

Loss of other benefits should also be taken into account (e.g., what else could that funding achieve in less controversial and more inclusive activities?)⁴⁹.

5. Regulatory failures

⁴⁶ This is calculated by dividing the total expenditure (as claimed) for duck hunting, by the GMA annual “harvest” figure for ducks.

⁴⁷ See: https://www.gma.vic.gov.au/_data/assets/pdf_file/0005/911129/Wildlife-Victoria-Submission-for-2023-Duck-Season.pdf pp5-6.

⁴⁸ The Australia Institute, Out for a Duck, 2012 <https://australiainstitute.org.au/report/out-for-a-duck/>.

⁴⁹ GMA licence data shows that 98% of duck shooters are male.

Given the long-term decline of species, including two species joining the threatened list, and the persistent problem of illegal and unethical shooter behaviour, GMA has failed its responsibilities under the *Game Management Authority Act 2014* (the **GMA Act**). In particular:

- The objective (in s5(a)) to “promote sustainability and responsibility in game hunting in Victoria”;
- The objective (in s5(b)) to “perform the functions set out in section 6” (see following dot points);
- Section 6(e) – to develop plans and procedures to address:
 - (i) the sustainable hunting of game animals; and
 - (ii) the humane treatment of animals that are hunted or used in hunting; and
 - (iii) strategies to minimise any negative impact on non-game wildlife, including protected and threatened wildlife.
- Section 6(g) – to promote sustainability and responsibility in game hunting.

Currently the *Wildlife (Game) Regulations 2012* specify 241 duck shooting locations where non-shooters are excluded. These comprise 200 State Game Reserves and 41 other wetlands. However, the legal basis for shooting ducks at thousands of locations around the state remains unclear.

Unless the legal basis can be clearly stated publicly by the GMA (as per s8A (f) of the GMA Act – the principle of transparency) **then duck shooting should immediately cease.**

We raised our concern about the legal basis for duck shooting grounds in our 2022 and 2023 submissions and received no clarification, so we directly requested a response from the GMA Board. A response letter was provided (see **ATTACHMENT I**) but the legal position remains unclear. The GMA Board Chairman advised:

“Where hunting (in any form) occurs depends on the status of the land and whether activities are specifically permitted or disallowed. In other instances, the law may be silent on hunting as a use, meaning that it is permitted.”

This suggests a default position that hunting is permitted unless specifically prohibited. It seems from GMA’s response that legislation for duck hunting on public land is obscure, out-dated and at odds with current community attitudes.

We are not satisfied that there is a clear legal basis for allowing recreational bird hunting on many sites around Victoria. This legislation is long overdue for review, and duck shooting should be removed as a permitted activity.

It is impossible for GMA to monitor all locations where shooting is permitted, 24/7 over the open season. Locals submit that even if a patrol visits a wetland in the morning, shooters know that officials will not return that day. We have submitted disturbing eye-witness accounts to GMA regarding lawless behaviour near residents’ homes (see **ATTACHMENT J**), but there has been no follow-up from GMA.

GMA has also invested considerable public funding in pro-shooting projects despite clear evidence of game species decline recorded by EAWS. We now must reluctantly question the

independence of the regulator, GMA⁵⁰, and therefore its recommendations to Government and management of seasons, given the apparent and dangerous plight of our native waterbirds.

6. Conflicts of interest

Shooters campaigned for twenty years⁵¹ to get their own hunting agency (GMA), knowing it would promote their interests. As the GMA was being planned and established across 2013 to 2014, a similar body – the Game Council of NSW – was being abolished after a damning independent review⁵² that found the body *“has not been able to resolve the inherent conflict of interest associated with its functions to both represent the interests of hunters, and to regulate their activities.”*

It is not appropriate for Victorian hunting policy and compliance activities to be orchestrated by individuals who have vested interests in hunting. The continued involvement of such individuals, particularly in light of lack of due process (see Section 7 below), raises concerns about conflicts of interest, and has resulted in the GMA acquiescing to the shooting lobby. For example, the Committee that designed the WRAP appears to have been dominated by shooters, even including a representative from a major firearms manufacturer.

Concerns about conflicts of interest were highlighted in the Pegasus Economics (2017) report⁵³, the only independent assessment of the GMA, which identified serious conflicts of interest, with GMA being *“too comfortable”* with shooters. Related to the Pegasus findings, Animals Australia’s Legal Counsel wrote to Minister Thomas on 4 February 2021 expressing the urgent view that:

“... the only option that would promote the objects of the Wildlife Act, specifically, the protection and conservation of wildlife (s1A) would be an absolute prohibition on duck shooting for the 2021 season, and until effective regulatory reforms [recommended by Pegasus] are made.”

However, no action appears to have been taken to address these integrity issues, and regulatory failures continue to be reported during the 2023 season, resulting in an ongoing crisis of public confidence in hunting regulation.

7. Lack of due process

7.1 Failure to consult key stakeholders

Failure to consult non-hunting stakeholders represent a failure of due process. Non-hunting stakeholders are yet to be consulted about the revised *Wildlife (Game) Regulations 2012*, due to be introduced early September 2023. This represents a failure of due process as all key stakeholders should be consulted in regulatory review. Furthermore, it is not fit or proper if only hunting stakeholders were consulted in the review, and such failures call into question the integrity of the resultant draft regulations.

⁵⁰ FOI Request number 18-7423 to GMA provides information that some key personnel in GMA are duck shooters themselves.

⁵¹ As stated in FGA annual report 2014-15, p11.

⁵² The Dunn review: <https://invasives.org.au/wp-content/uploads/2014/07/Game-Council-Governance-Review-S-Dunn-14-June-2013.pdf>.

⁵³ See: <https://www.abc.net.au/news/2018-03-01/report-slams-victorias-game-management-authority-over-duck-hunt/9499334>.

7.2 Failure to inform the Minister and misleading the Parliament

During the opening weekend of the 2017 duck season, the GMA failed to inform the Minister of widespread illegal behaviour by shooters at Koorangie Marshes near Kerang.

Four days later, the Minister told Parliament that it had been “a very orderly weekend.”⁵⁴

The following day a GMA media release acknowledged and condemned the shooters’ behaviour (see **ATTACHMENT H**). GMA acknowledged that shooters had “fired early, failed to correctly identify their target...birds were left in the water, including significant numbers of protected species...hunters have been taking excessively long shots well outside of their shooting skills distance, resulting in wounding and lost birds. Some made no attempt to recover downed birds and kept shooting”.

No one has been held responsible.

8. Waning participation in duck shooting

Duck shooting is waning in Victoria. Less than 0.2 per cent of Victorians went duck shooting in 2022.

As of 30 June 2022, GMA lists 23,098 licensed shooters, the lowest since 2010 (despite Victoria’s population booming during this time). Despite the elongated 90-day season, less than half (n= 11,282) of the licensed duck shooters took part in 2022⁵⁵. Those with a duck licence also have an entitlement to shoot the native Stubble Quail, but few do. In 2022, only 9% of them (n= 2,549) took part in the three-month quail shooting season.

When fewer and fewer people are applying for licences and the number of active shooters is declining, it begs the question why so many resources are being directed to support the harmful activities of this group.

9. The high likelihood that the WRAP will fail

The WRAP represents piecemeal “reforms” which are unlikely to reduce the crippling ratio (number of ducks wounded for every duck bagged) to 10% any time soon, if ever, and are no substitute for a total and permanent ban.

Disregarding Victorian field trials in 2008 and 2012⁵⁶ that showed the wounding rate for experienced shooters was around 30%, GMA has now adopted the Danish approach for monitoring wounding rates, despite the Danish methodology being unsuitable for Victoria. If adopted, the WRAP will extend the suffering of many animals for many years.

It appears there was little objective analysis of the likelihood that the Danish approach would resolve the vastly more serious wounding problem in Victoria. Animals Australia has previously warned GMA in our annual submissions that the WRAP is highlight likely to fail, and the Danish wounding reduction method is not applicable in Victoria. These concerns are summarised here.

⁵⁴ Hansard Legislative Council, 21 March 2017, p 1476.

⁵⁵ *Estimates of Duck and Stubble Quail Harvest in Victoria for 2022*, GMA, p9: https://www.gma.vic.gov.au/data/assets/pdf_file/0009/938547/Game-bird-estimates-2022-Final-Artwork-Low-Res.pdf.

⁵⁶ Conducted as part of a train-the-trainer program for the Shotgunning Education Program (SEP) and Masterclass (information obtained from S Toop, GMA, by email 29.12.20).

9.2 Prohibition is the only effective means to reduce wounding

The WRAP touts Denmark as a “world leader” in wounding reduction because it has reduced wounding in the hunting of Pink-footed Geese (PFG). But the WRAP conveniently omits to mention that the best method of reducing the wounding of PFG has been implemented by Denmark’s neighbours.

The Netherlands (1976), Germany (1977) and Belgium (1981) banned the shooting of PFG long ago⁵⁷. Their chosen method is cheap (costless), 100% effective, 100% humane, immediately available, and permanent.

9.2 The WRAP relies on shooters to self-regulate

Self-regulation is not effective. There is ample evidence that shooters have not and will not stop engaging in wounding-type behaviours and practices. In some cases, as indicated by discussions on social media (see **ATTACHMENT C**), some shooters deny that wounding is even a problem despite clear long-standing and ongoing evidence. For example:

- The massacre at Koorangie Marshes (2017) – Dozens of shooters commenced shooting before and after legal times. Hundreds of protected species were shot, and hundreds of birds were left un-retrieved. Volunteer rescuers recovered 183 illegally shot threatened species and 296 protected birds but no one was held accountable by the GMA despite their presence; and
- The massacre at Box Flat (2013) – Similar to the above.

9.3 The WRAP relies on population data that does not exist

The Danish wounding reduction method relies on an accurate count of the duck population at the start of the shooting season but as noted by Kingsford and Klaassen (p7)⁵⁸, “*the number of ducks in Victoria and SE Australia is unknown and, despite the best of efforts and the use of advanced technology, likely also impossible to know with great accuracy*”.

9.4 General population trajectories differ between PFG versus avian populations in Australia

The Danish PFG populations are on the rise, whereas there is sufficient data on population trends to indicate that our “game” duck species are in long term decline.

9.5 Population variability differs between PFG versus avian populations in Australia

PFG population numbers in Denmark follow stable, predictable seasonal patterns, whereas Victoria’s ducks migrate through the eastern states according to climatic events that influence habitat and food supply. Therefore, wildfowl numbers in Victoria are likely to fluctuate before

⁵⁷ Noer, Madsen and Hartmann, *Reducing wounding of game by shotgun hunting: effects of a Danish action plan on Pink-footed Geese*, Journal of Applied Ecology 2007: <https://besjournals.onlinelibrary.wiley.com/doi/full/10.1111/j.1365-2664.2007.01293.x>.

⁵⁸ Kingsford and Klaassen, *Relationships among duck population indices and abiotic drivers to guide annual duck harvest management* Nov 2021, p7: https://www.gma.vic.gov.au/data/assets/pdf_file/0006/863610/Combined-Final-Report-and-Attachment.pdf.

and during the season, especially in response to increasingly erratic and severe climate-related events in the eastern states (drought, fire, storms, flood etc).

9.6 Crippling ratio

Data on how many ducks are wounded for every duck bagged are needed to calculate the crippling ratio⁵⁹. We question how GMA has gone about collecting this data following the end of the shooting season 14 June to 22 August 2022,⁶⁰ as it appears the methodology was designed to under-estimate wounding rate. To explain:

- **Selection of sites with low yields** – GMA undertook live-trapping of 596 ducks at 5 sites in Victoria. Three sites were clustered in the north-east near Wangaratta, and two were in the south-west at Lara and nearby Point Wilson. The selection of sites is puzzling because these two Catchment Management Authorities (**CMA**) regions had the second-lowest yields⁶¹.

Omission of sites with high yields – Two test sites near Sale (Dutson Downs and Heart Morass) – in the CMA with greatest harvest – have been removed from consideration. The Heart Morass site is owned by FGA and has installed hen houses to breed ducks for gun fodder, so would likely have high numbers of wounded ducks. Kerang, which is located in the CMA with the second-highest harvest result, has also been dropped⁶².

Despite not accounting for birds that did not survive wounding, and apparent attempts to sample ducks from less heavily shot areas, the likely results are damning. The WRAP focuses on first-year ducks which have survived one shooting season only.

We have extrapolated the “crippling ratio” (no. of birds wounded for each bird bagged) for first-year ducks:

Percentage x-rayed with shrapnel:	7.5%
2022 harvest:	262, 567
Estimated duck population at season start:	2.9m, 95% CI [2.4,3.6m]

Harvest rate = harvest / population at start of season
 = 262,567 / 2.9m = 0.09

Crippling ratio = Wounding rate/Harvest rate
 = 0.075/0.09
 = 0.83

⁵⁹ Calculations are based on a method devised by Clausen et al (2017), as described on p20 of the WRAP.

⁶⁰ Monitoring trends in waterfowl wounding 2022, GMA, p10:
https://www.gma.vic.gov.au/_data/assets/pdf_file/0010/938548/Wounding-Results-Report-2022-Final-Artwork-Low-Res-Email.pdf.

⁶¹ Harvest map taken from P11 from GMA’s 2022 harvest report:
https://www.gma.vic.gov.au/_data/assets/pdf_file/0009/938547/Game-bird-estimates-2022-Final-Artwork-Low-Res.pdf.

⁶² Monitoring trends in waterfowl wounding 2022, GMA:
https://www.gma.vic.gov.au/_data/assets/pdf_file/0010/938548/Wounding-Results-Report-2022-Final-Artwork-Low-Res-Email.pdf.

A crippling ratio of 83% means more than 8 stricken birds were abandoned for every 10 birds bagged. GMA and its researchers would almost certainly have calculated this figure but have refused to disclose it. Non-disclosure of this calculation does not bode well for transparency and trust in the WRAP or the regulator.

During the life of this government, and under the supervision of the GMA, a total of 2.0 million native waterbirds (self-reported) have been bagged across the 2015-2022 seasons. A conservative estimate of 30% crippling ratio means that an additional 600,000 were abandoned to suffer from their injuries. The crippling ratio of ~80% (derived above from the first year of WRAP data) would mean that 1.6 million native waterbirds have been left to suffer. This represents long-term, large-scale, state sanctioned animal cruelty.

9.7 Lag means the WRAP will not be evaluated in a timely manner

The GMA has all the data required to estimate the number of ducks wounded for each duck bagged (as outlined above) but the WRAP states this calculation will not be released until 2025. If the first data point is not released until 2025, many more years will pass until trends can be established to indicate whether there are any improvements in shooting practices?

The GMA has said it will not factor in any wounding rate when determining annual harvest levels until 2026 (See 4.3 on p19). We question why the GMA would spend all this time and money on a WRAP if they are not going to incorporate resultant data into policy and legislative decisions in a timely manner?

9.8 Differences in hunting licence requirements and training between Denmark and Australia

The Danish wounding reduction method, the results of which involved a different cohort of hunters complying to a different set of requirements, is not applicable in Victoria. This is due in part to different hunting licence requirements, which are far more onerous in Denmark⁶³. For example:

- **Different training requirements** – In Denmark, anyone seeking a hunting licence faces mandatory training (over a weekend, costing ~\$1,000 AUD), then a test of theory and practical shooting skills⁶⁴. In Victoria, apart from the once-off WIT test, Victorian bird hunters do not have to pass any tests for skill or knowledge. The WRAP only proposes a once-off online theory quiz (open to cheating), and there is no requirement for existing duck shooters to pass any practical shooting skills test. The WRAP rejected the recommendation of some stakeholders that mandatory training be included to complement testing and further improve hunter knowledge/skills in Victoria⁶⁵. The US ballistics expert who trained the SEP trainers wrote of the highly disciplined efforts required for wounding rate to be reduced from an average of 31% down to 6%. We question how duck shooters in Victoria can be expected to achieve this reduction without mandatory training.
- **Different incentives/disincentives** – In Denmark, hunters had to demonstrate significant reductions in wounding rates or face a hunting ban. In contrast, in Victoria,

⁶³ DJPR FOI request 6662.

⁶⁴ The shotgun shooting skills test only requires a hit on 3 out of 18 attempts.

⁶⁵ Refusal by GMA to mandate training is inconsistent with recommendations made in the Pegasus report (2017) (p26) - *“Under the current arrangements, the GMA is providing education and awareness programs to hunters only after they have acquired a licence to hunt, which does not provide any strong incentive for hunters to participate... The current arrangements are analogous to VicRoads providing driver education only after a licence has been allocated to drive on a public highway.”*

there is no mention of possible restrictions or a ban. Instead, the proposal is to offer shooters as yet unspecified “incentives” or “inducements” to complete a practical test.

- **Different testing integrity** – For each testing provider, the GMA website will publish the number of participants and the percentage who pass (p16). This will encourage shooters to frequent those providers who “assist” them to pass. There is anecdotal evidence that some police and other officials involved in administering the firearms safety test and the WIT test have provided “unofficial assistance” (e.g., hinting at the correct answers) to help candidates pass.
- **Different bird retrieval rules** – In Denmark, hunters must use a retrieval dog when hunting PFG, so fewer wounded birds would be left at the wetland. In contrast, only ~26% of quail hunters used dogs last year, and it is likely that few duck hunters in Victoria use dogs⁶⁶.

9.9 WRAP will virtually sanction large-scale, long-term animal cruelty

Victoria’s average (hunter self-reported) duck “harvest” is 24 times that of PFG hunters in Denmark⁶⁷. After 25 years, the Danes reduced their wounding rate for first-year geese from 100% (one wounded for each one bagged) to 10% (one wounded for every ten bagged) which the Danes claim is “socially defensible”. Even if Victorian taxpayers were prepared to wait – and pay – for 25 years of a WRAP project, a 10% wounding rate here would result in some 32,000 abandoned, injured ducks every year⁶⁸. Such levels of abject animal cruelty are indefensible” in 21st century Victoria⁶⁹.

9.10 WRAP makes no accommodations for prohibition

The GMA does not appear to have adopted one of the key aspects of the Danish approach, namely⁷⁰ that “*hunters were granted a limited period to significantly reduce wounding voluntarily...If “major” reductions were not achieved, restrictions and obligations would be increased. If that failed, waterfowl hunting would be banned in Denmark.*”

9.11 There is no WRAP for quail

There is no WRAP within the foreseeable future for the native Stubble Quail. Last year 77,590 Stubble Quail were bagged. Even if the crippling ratio for Stubble Quail fell to 10%, that is nearly 8,000 wounded birds left to suffer a cruel fate each year. Unless there is a ban on shooting quail, these birds will continue to suffer from wounding for the foreseeable future.

In our view, the GMA’s Ministerial briefing on quail hunting dated 6 March 2023 misleads the Minister and illustrates GMA’s bias towards hunting. Examples are **included in ATTACHMENT K**.

ATTACHMENT K also provides significant information on the inadequacies of GMA/Regulatory oversight of quail hunting in Victoria, including insufficient data or knowledge

⁶⁶ As discussed later in this submission, GMA’s published data on use of dogs for quail hunting seems largely incomprehensible.

⁶⁷ AEWG European Goose Management Platform, *Briefing Note Population status and management recommendations 2022* p2: https://egmp.awa.info/sites/default/files/download/population_status_reports/EGMP_population_status_briefing_note_2022.pdf.

⁶⁸ Based on GMA average harvest of 320,065 (2009 – 2022).

⁶⁹ Mathematically, a small percentage of a large number is a significant figure.

⁷⁰ These three points were cited in a presentation, *Monitoring wounding in recreational duck hunting in Victoria*, by GMA’s Toop and Hampton. DJPR FOI 20-48275.

of quail populations, the apparent long-term decline of native quail populations (based on reported 'harvest' levels), GMA's 10-fold overestimates (in ministerial advice) of the number of quail shooters, the lack of any information on quail wounding rates, and the continuing legality of the use of toxic lead shot in the recreational shooting of quail. Hence we draw the Committee's attention to this significant **ATTACHMENT K**.

10. Withdrawal of social licence

The majority of Victorians now have a zero tolerance for recreational cruelty to native birds. Contrary to the historic claim that duck shooting is an economic lifeline for the regions, there are growing calls from regional residents and businesses to end duck shooting⁷¹.

Surveys by Roy Morgan (2007) and RSPCA Victoria (2022) show that over 80% of the community are concerned about recreational duck shooting, due to declining numbers of native waterbirds, the suffering of wounded ducks, and the illegal shooting of protected and threatened species (see **ATTACHMENT G**).

Animals Australia is advised that rescuers attending the Victorian open lakes and wetlands during the 2023 season have observed the examples of unacceptable or illegal activities listed below, primarily at Wooranook Lakes, Round Lake, Gill Gill, and Lake Buloke.

Where appropriate, formal complaints regarding the below observed and document activity will be lodged with the GMA:

1. Shooters wounding / killing birds but failing to retrieve them;
2. Shooting before 8am legal shooting time;
3. Walking with unbroken guns;
4. 'Windmilling' birds to kill them;
5. Shooters shooting at birds sitting on the water;
6. Shooters toileting less than 50m from shoreline;
7. Protected trees being cut for firewood;
8. Shooter camp set up less than 20m from shoreline;
9. Non-gun dogs on wetlands;
10. Shooters 'flushing' birds into the air with a boat;
11. Two birds with wings removed, one found stuffed in a tree trunk, wings located separately;
12. Five birds and various body parts found buried in 3 shallow pits; and
13. Children feeding bread to ducks to lure them close (and before 10am).

Rescuers have located numerous unretrieved wounded or killed birds, some listed as threatened or protected species including:

1. *PROTECTED* Black Tailed Native Hen (Dead on arrival: **DOA**)
2. Grey Teal (x 4) (DOA)
3. Grey Teal (Euth)
4. *THREATENED* Hard Head (DOA)
5. *THREATENED* Blue Winged Shoveller (Euth)
6. *THREATENED* Blue Winged Shoveller (x3) (DOA)
7. Black Pacific (x 2) (DOA)
8. Chestnut Teal (x 2) DOA)
9. *PROTECTED* Eurasian Coot (DOA)

⁷¹ See for example residents' comments on the website of Regional Victorians Opposed to Duck Shooting inc: <https://www.regionalvictoriansotds.com/>.

10. Grebe (DOA)

The Wildlife Victoria (**WV**) veterinary triage unit at Wooroonook Lakes has triaged 78 birds to date and has reported the following (not a comprehensive list, and it does not account for birds who are rescued by individual volunteers, or those who are taken for treatment or euthanasia to other vets (e.g., Zoos Victoria):

1. Birds left in the field, as of 30 April (day 5 of the season);
2. Hardhead Duck x 1, DOA, confirmed shot;
3. Freckled Duck x 1, DOA, confirmed shot;
4. Grey Teal x 1, DOA, confirmed shot; and
5. Pink Eared Duck x 1, presented alive and euthanised by the unit, confirmed shot.

Media has also reported the WV veterinary triage unit at Donald as seeing 4 x Blue Winged Shovellers and 1 x Hardhead Duck, presented DOA / with lethal gunshot wounds. WV also reported 3 x non-game species waterfowl have been killed.

It is important to note that the above instances are not exhaustive. They are a 'snapshot' of known breaches and behaviours. They also do not account for birds that are rescued by individual volunteers, or those birds taken for treatment or euthanasia to vets outside of the Wildlife Victoria veterinary team (for example, taken to the Zoos Victoria veterinary clinics).

Concluding remarks

In summary, Animals Australia advocates for a permanent ban on all recreational bird hunting in Victoria for reasons including but not limited to:

- Inherent **animal cruelty**;
- Threats to **biodiversity conservation**;
- Significant and unnecessary **costs to taxpayers**;
- Apparent **misuse and misrepresentation of the science** resulting in erroneous policy and legislative decisions;
- Apparent **conflicts of interest, failures in due process** and a litany of **regulatory failures**;
- **Jurisdictional inconsistencies** (game bird hunting is prohibited in other states/territories); and
- **Withdrawal of shooters' social licence** to operate.

Animals Australia advocates for a complete and permanent prohibition of recreational duck and quail hunting in Victoria as these practices raise serious concerns relating to:

We commend this submission (and attachments) to the Committee, and we request the opportunity to give evidence before the Committee.

Please contact me if you require additional information or references in the interim.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Glenys Oogjes', with a stylized flourish at the end.

Glenys Oogjes

Chief Executive Officer
Animals Australia Federation

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Attachment B

The unavoidable wounding of native birds during hunting

“Duck hunting by shotgun unavoidably causes wounding of waterfowl due to insufficient pellet strikes that penetrate to vital organs or fail to immobilise the bird so it can be recovered and dispatched.”

– Simon Toop (Director Strategy and Research) and Dr Jordan Hampton (Research Principal), GMA¹

KEY POINTS:

- The wounding of native birds during recreational duck and quail hunting can never be eliminated.
- Numerous studies show that the often-quoted 25% wounding rate is an underestimate.
- Duck shooters have shown little interest in accuracy training and testing. Taxpayer funding of this has not delivered results.
- The proposed Wounding Reduction Action Plan (**WRAP**) would at best reduce the wounding rate (but never eliminate it) for the trickle of new shooters. Existing shooters would continue as before.

1. Why is bird hunting cruel?

Some wounded/downed birds will be retrieved by hunters and subsequently killed, others will escape to recover or die later. The suggested % of targeted ducks that are wounded (not killed instantly in flight) will be much higher than the 25% conservative estimate often quoted.

Many studies are underestimates as they can only study those birds that are wounded, escape a hunter, and subsequently survive long enough to be counted/retrieved/studied.

To target a small moving object (a bird in flight), a spray of pellets² is fired from a shotgun; a single bullet (e.g. fired from a rifle) would be highly likely to miss. The nature of the weapon (a shot gun) used to hunt flying birds means even skilled/good shooters will wound ducks; it is inevitable. Other birds in the flock or vicinity will also be distressed or may be exhausted (fatally dropping from the sky) if continually disturbed in the region of the shooting.

¹ Power-point presentation - documents released under FOI (DJPR FOI 20-48275).

² Steel pellets for ducks; toxic lead pellets for quail.

Sub-lethally injured birds will likely die due to inability to escape predation, inability to feed, and inability to thermoregulate (over time) as the result of injuries received. These birds will suffer pain and distress from the injury or subsequent wound infection, and from starvation or thirst if they cannot access resources. Injuries to the bill of waterbirds also occur leading to slow deterioration, though it is likely the birds would be predated first.

2. Can training and skills-testing reduce wounding?

Training can/could reduce wounding rates, but cannot eliminate wounding, due to the nature of shotgun pellet spray action.

According to GMA harvest reports, the majority of birds bagged in Victoria are shot on private land, where shooter behaviour is even less visible to the public and to regulators.

Wounding rates are high (as evidenced in the research cited below) and this may be caused or increased due to inexperience, incompetence (skills deficit), impatience, poor visibility (particularly in foggy conditions, or before dawn or after dusk) and/or due to impairments from alcohol or other substance consumption. There is no random testing of bird shooters for alcohol or drugs. However, even after training and other variables are reduced, wounding is still apparent, albeit reduced.

In April 2008 the Victorian Government funded an initial 'train the trainer' program which took some experienced shooters/hunting leaders through a one-week training, hands-on skills course (conducted in Tasmania). Initial testing of the group participants (using clay targets) found that they had an average of 29.4% 'wounding' (miss) rate. After a week of intensive training that rate had been substantially reduced, but still stood at 5.1%³. It should be noted these shooters were experienced, recently highly practised, and were operating under optimum conditions and scrutiny.

The Victorian Government subsequently funded and developed educational material and a one-day Shotgunning Education Program (**SEP**). However, the course was voluntary and only a couple of hundred or so hunters have attended over the approximately ten years it has been available. In an attempt to improve uptake, GMA conducted market research in July 2017. It then obtained funding from the Department of Sport and Recreation to implement the findings; the result was a re-branded Gamebird Hunting Essentials Masterclass program⁴. Some 26,000 licensed Victorian shooters (of duck and quail) have not attended.⁵

A 2020 GMA Board paper⁶ summarised the SEP/Masterclass as follows:

“Despite excellent reviews from attendees, uptake of the in-field program has been poor to the point that the program is essentially defunct. Written materials have been mailed directly to hunters and are available on the Game Management Authority website and on DVD. However, it is unknown whether hunters read, understand, or put this information into practice.”

³ Advice to the November 2008 meeting of the Victorian Animal Welfare Advisory Committee by Department Officer Simon Toop.

⁴ GMA annual report 2018-19, p19.

⁵ According to GMA “harvest” reports, up to half of these are “inactive” – do not take part in the bird hunting season.

⁶ DJPR FOI Ref 6662; OVIC Review Ref C/22/00814; GMA Board Meeting 2020/02, Agenda Item 5.1, Attachment 02, page 9.

Although hunting clubs have been involved in development of the Wounding Reduction Action Plan (WRAP), less than 30 per cent of game hunters belong to a club⁷. The WRAP does not propose to test current duck shooters for accuracy. At most it would impose an online knowledge test (easy to cheat on, for example by getting help from a mate).

3. Wounding research studies

A listing of the evidence of wounding rates gathered over past decades follows:

From 1957 onwards: Some of the earliest studies **utilised X-rays** of caught birds – though clearly these are only those who survived in order to be later caught (an underestimate).

1976 - In the largest of these studies⁸, a total of 45,210 ducks were caught over a 16-year period in Victoria (**1957-1973**). It showed that duck hunting results in a significant number of surviving ducks with shotgun pellets embedded in their body. An x-ray study of trapped live ducks (of mixed species) in Victoria over those years reported that between 6% and 19% of ducks had embedded shot.

These are the results of how many ducks (of the different game species) contained shotgun pellets in their bodies:

Species	Black duck	Chestnut teal	Grey teal	Shelduck	Wood duck	Hardhead
% with pellets	13.7%	6.2%	9.0%	19.0%	13.6%	11.1%

A. Norman and Powell 1981⁹

A study which examined the impact of hunting activity on four species of native ducks in Victoria from 1972 to 1977, reported 14% to 33% of birds were wounded but not retrieved.

B. Van Dyke 1981¹⁰

A broken wing is the most common crippling injury of hunted birds. In this reprehensible study, wings of mallard ducks were deliberately broken, and they were returned to wetlands with a radio tracker to monitor their fate. 52 of the 56 released birds died due to either starvation or predation.

This is an important point in relation to the GMA’s current, taxpayer-funded X-ray studies, because it provides some estimate of how many would have died before they could be X-rayed. It also demonstrates the suffering of downed ducks.

Although this study would likely fail an Ethics Committee now, it was simply doing what shooters do to birds – but deliberately rather than “inadvertently”. But as no one disputes that bird wounding is an inevitable part of bird hunting, it’s hard to argue that the hunter’s wounding is “inadvertent”.

⁷ https://djpr.vic.gov.au/_data/assets/pdf_file/0008/1948706/v.4Economic-contribution-of-recreational-hunting-in-Victoria-accessible.pdf Table A6-1, p91.

⁸ Norman FI (1976) The incidence of lead shotgun pellets in waterfowl (Anatidae and Rallidae) examined in south-eastern Australia between 1957 and 1973. *Australian Wildlife Research* 3:61-71.

⁹ Norman FI & Powell DGM (1981) 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* 8:659-664.

¹⁰ Van Dyke, F. (1981). Mortality in crippled mallards. *Journal of Wildlife Management*, **45** (2) 444-453.

C. Russell (1994)¹¹

A study which used a mathematical model to examine the pellet cluster pattern of commonly used shotguns and ammunition, reported that for every two ducks killed, at least one would be wounded and that even competent shooters cannot avoid wounding birds. This is because shotguns spray a multitude of pellets at a group of birds, rather than being able (usually) to target an individual bird. A bird hit by the central cluster of pellets will usually be killed quickly and fall to the ground, but those at the perimeter of the pellet spread might only be hit by a few pellets, likely missing vital organs.

D. Noer and Madsen 1996¹²

355 pink-footed geese were caught and x-rayed in Denmark. Among first-year geese (exposed to one hunting season only), 25% contained pellets, compared to 36% for older geese (more than one hunting season). The report noted (p73): "*In addition to the geese identified as carriers by X-ray examination, an unknown loss of crippled, non-retrieved individuals must be added, together with the geese which are wounded but survive without retaining pellets.*"

E. Allison (for Humane Society International - HSI) 2001¹³

A detailed review report commissioned by HSI concludes that 20-40% of birds shot by shotguns are not retrieved. They are either killed or wounded (crippled). 90% of the latter die slow, painful deaths (Neiman et al 1987). The report canvasses Roster's American studies in which hunters said the crippling rate was 6-18% but trained hidden observers in Roster's study said the crippling rate was at least 20-45%, likely higher as injuries in airborne birds were not quantifiable.

The Allison report also reviews a more recent study which showed for every bird "bagged" another was crippled, that is, 1 for 1, and "based on probability and shot pellet characteristics, 33-60% of all ducks shot are crippled". It states, "educational efforts to curtail wounding have apparently failed". It also stated published harvest rates do not include wounded birds for which we must add another 25-67%.

F. Noer et al 2007¹⁴

For the 1997-98 hunting season a Danish action plan was introduced to reduce cripple rates (e.g. shooting distance must be within 25m). This reduced but did not eliminate wounding: % of pink-footed geese with embedded pellets.

¹¹ Russell G (1994) Shotgun wounding characteristics. *Maple Tech: Maple in Mathematics and the Sciences (Special Issue)*. Boston: Birkhauser, pp 17-20.

¹² Noer, H. & Madsen, J. (1996). Shotgun pellet loads and infliction rates in pink-footed geese *Anser brachyrhynchus*. *Wildlife Biology*, 2 (2) 65-73.

¹³ Robert Alison, Ph.D. Waterfowl Biologist - The Ones That Almost Got Away: Unseen Victims Of Waterfowl Hunters (2001). Ontario, Canada A [report](#) for the Humane Society International.

¹⁴ Noer, H., Madsen, J. & Hartman, P. (2007). Reducing wounding of game by shotgun hunting: effects of a Danish action plan on pink-footed geese. *Journal of Applied Ecology*, 44 653-662.

Year	1 st years	Older birds
Total before 1997	24.6%	36.0%
1998	10.5	27.1%
2000	11.1	28.9
2001	10.0	23.0
2002	6.3	20.1
2003	10.3	21.4
2004	11.0	20.9
2005	6.7	17.8
Total after 1997	9.2	22.2

G. Holm and Haugaard 2013¹⁵

Examined the effect of the Danish action plan (to reduce wounding) on eider ducks.

% with embedded pellets

Year	Females	Males
1997	34.1%	35%
2001	26.3%	28.3%
2009-11	5.5%	22%

WOUNDING OF OTHER SPECIES using shotguns.

Evidence of the wounding by the inherent attributes of shotguns also comes from other contexts.

Researchers from the Institute of Wildlife Research at the University of Sydney investigated the extent of wounding caused by shotguns in the Hawkesbury region¹⁶.

They collected dead and injured bats from orchards in the morning, 8.5 hours after shooting ceased, over a period of 14 days. Of the 164 bats collected, 50 were still alive, a total of 30%. This figure may be an underestimate of wounding because some could have died of their injuries during the night, and some wounded bats could have left the property.

¹⁵ Holm, T. & Haugaard, L. (2013). Effects of a Danish action plan on reducing shotgun wounding of Common Eider *Somateria mollissima*. *Bird Study*, 60 131-134.

¹⁶ Divljan, A., Parry-Jones, K. & Eby, P. (2011). Deaths and injuries to grey-headed flying-foxes, *Pteropus poliocephalus* shot at an orchard near Sydney, New South Wales. *Australian Zoologist*, 35 698-710.

Injuries to live bats were:

91%	Fractures of a long bone
18%	Broken ribs or sternum
12%	Damage to jaw
18%	Internal bleeding due to chest injuries

In 2008, the Queensland Animal Welfare Committee concluded that it was inhumane to use shotguns to shoot flying foxes in orchards. A flying fox is larger than a teal and smaller than a black duck but has a similar weight to a wood duck. So, the reasons given for the inhumanity apply equally to ducks, and include:

*“ ... ii) the capacity of shooters using shotguns to achieve instant death via a shot to vital organs (brain or heart/lungs);
iii) the extent of injuries sustained by animals that are not killed immediately, the fate of those animals and the pain experienced;
iv) the capacity of shooters to locate injured animals quickly and kill them humanely ...”*

These findings from this study illustrate all 3 points noted by the Queensland AWAC and apply to any animals shot with shotguns. The researchers concluded:

“There is evidence that flying foxes that were shot to protect fruit crops were subjected to cruelty in that a high percentage survived with injuries for considerable lengths of time. This is an offence under the POCTA 1979 [NSW] and this cruelty would be unacceptable even if the animal was a feral pest. “

4. Cruelty in Quail Shooting

There have been no studies (to our knowledge) done on quail wounding rates.

Shooters do not need to pass an ID test to shoot quail, even though only one of about 5 native quail species can legally be shot. Also, the critically endangered Plains Wanderer can easily be confused with a quail, especially in poor light.

Quail shooters are allowed to use toxic lead ammunition. The use of lead is an issue in itself – with tonnes of lead shot entering waterways from quail shooting. Dabbling ducks like Blue-billed ducks and other bottom-feeding wading birds ingest the pellets, as will secondary predators like eagles and the threatened White-bellied Sea eagle. Lead poisoning is an extremely cruel, slow, and painful death. [See 2018 CSIRO report here.](#)

5. Role of government advisory bodies

The Victorian Animal Welfare Advisory Committee has on numerous occasions advised (relevant incumbent) Ministers to **ban or phase out duck shooting on animal welfare grounds**. Those recommendations were made in 1993, 1995, 1997, 2000 and 2003. In 2023 a Victorian Legislative Council Inquiry recommended an immediate ban.

The 1995 decision to ban duck shooting in NSW was based on previous advice from its Animal Welfare Advisory Council¹⁷:

¹⁷ NSW AWAC 1988 Report point 1.2.7.

“In considering all the available information from the scientific sources and all the various opinions that were presented to it in written and oral form, the Council concluded that the rate for the wounding (crippling plus other instances where ducks are shot and hit, but not downed) of ducks in NSW during the open season was likely to be up to 20% of the total bag. In an average season up to 44,000 ducks could be wounded, the majority of which could be expected to be seriously wounded and left in the field to suffer pain and die”¹⁸

In 2005 when Queensland became the third Labor state in Australia to ban the recreational shooting of native waterbirds, the government’s [media release](#) stated:

“While it may once have been acceptable, community attitudes have changed and combined with environmental concerns, it has reached a stage where it is time to make a permanent decision about this practice. The new laws follow findings by the Animal Welfare Advisory Committee that the wounding rate in hunting these animals was unacceptably high. The committee found that up to 90 per cent of birds shot were not killed outright.”

Attachment compiled by Animals Australia
8 January 2024

¹⁸ NSW AWAC (1988). *Report of the NSW Animal Welfare Advisory Council on Duck and Quail Shooting.*

Simon Toop
Director Strategy and Research
Game Management Authority
535 Bourke Street
Melbourne, Vic. 3000

8 January 2023

Dear Mr Toop,

In response to your letter to stakeholders, dated 24 December 2023, we believe that the GMA must consider the critical recommendations and findings of the Victorian Parliamentary Inquiry Report on native bird hunting, which strongly recommends a permanent ban on recreational duck shooting in Victoria - line with four other Australian jurisdictions.ⁱ

The Select Committee Report provides a comprehensive review of the scientific literature that led to the top key recommendation to ban native bird hunting from 2024, and is clearly pertinent to any consideration of whether the Government should follow the report and legislate to implement an immediate ban. The huge community response to the inquiry also supports adoption of the report.

As stated by Labor Chair Ryan Batchelor,ⁱⁱ who tabled the report on 31 August 2023:

“It was clear that Victoria should end recreational native bird hunting on all public and private land from 2024. And this would bring Victoria into line with many other Australian jurisdictions.”

“It’s clear from the environmental evidence of long-term decline in native bird populations, largely driven by habitat loss and a worsening outlook as our climate continues to change. Despite record recent rainfall, bird populations have not recovered.

“The Committee was also acutely aware of the animal welfare issues associated with native bird hunting, unavoidable with native bird hunting, unavoidable wounding rates, and the killing of threatened and protected species.”

“Compliance efforts, while improving from a low base, have a long way to go to be truly effective ... The sheer size and geographic diversity of locations also makes it a near impossible task for the Game Management Authority to adequately enforce bird hunting regulations.

“It was also extremely upsetting to the Committee to see evidence of Aboriginal Cultural Heritage Sites that were damaged or destroyed by game hunters. And just as disheartening was an apparent lack of a coherent process for monitoring this reporting and responding to these issues by government agencies.”

While some union leaders have been badly misled on this issue, the Select Committee Report also clearly repudiates the shooters’ fearmongering claims that a ban on recreational duck shooting would have any negative impacts on recreational fishing or any other outdoor recreational activities.

It is also totally unacceptable that the GMA would recommend a nine-bird daily bag limit over three months, when the latest **Eastern Australian Waterbird Survey** (EAWS) shows that five out of the eight so-called ‘game’ species have crashed by up to 90 per cent in just 40 years, since the UNSW surveys (which won the 2023 Eureka Prize for Applied Environmental Research) began in 1983.

This includes the Australasian (Blue-wing) Shoveler and the Hardhead duck, which went straight from the ‘game’ list in 2022 onto the state’s threatened list. Yet both species were illegally shot in 2022 and 2023.

The Freckled Duck, Australia's rarest waterbird (and one of the world's most rare waterbirds), also continues to be illegally shot every duck shooting season, despite being listed as threatened in Victoria in 1988.

Furthermore, the latest ARI data (2022) shows that over 146 waterbird species listed as threatened in Victoria are known to be "susceptible" to serious disturbance, distress and displacement from critical habitat, as well as 'death or injury from shotgun pellets' (Appendix 1). It has a list of the top 32 "most vulnerable" species, including critically endangered OBPs and migratory birds.ⁱⁱⁱ

Other relevant documents include the [Australia's Threatened Bird Index - tsx.org.au](https://tsx.org.au), (2023) the first major update to the **bird index** since it was first released in 2018.^{iv}

We also draw your attention to the expert science from Birdlife International at its Data Zone, [Mapping of global threats using the IUCN Red List reveals hunting and trapping is the most prevalent threat to birds](#).^v

We would like to point out that the numbers of birds shot are unknown. No one knows how many birds are shot during duck shooting seasons. The post-season survey of shooters does not indicate the numbers of birds:

- illegally shot above the bag limit
- the illegally shot threatened and/or protected species
- the numbers left wounded on the wetlands

At the Parliamentary Inquiry into native bird hunting Professors Klaassen and Kingsford stated:

Klaassen: *.....we do not really know the numbers. There has been very little consistent monitoring taking place over the past years. Richard in this country is the only one that is doing a really good job there, and that is what is needed. So we need to have more information on the exact numbers or better estimates of the numbers of ducks that we are really talking about so that we can have a true impression, an idea, about what percentage of ducks are actually being harvested every year, because we have no clue.*

Kingsford: *I guess we have talked about the data that we provide. We have also discussed to some extent some of the drivers. There are also a lot of data gaps. And I think in decision-making **there is obviously the ability for ministers to think about some of the uncertainties involved in some of these datasets.***

Kingsford: *... Climate change is also occurring and coming fast. We do not fully understand what the long-term issues are in relation to that.*

Due to changing public opinion, Victoria's dwindling number of duck shooters have themselves disappeared from the wetlands, and make up fewer than 0.2 per cent of the state's population today.

Nature based tourism

Nature-based tourism could immediately replace recreational duck shooting when the Committee's recommendations are adopted.

In the same way that Premier John Cain, Joan Kirner and Evan Walker had the vision to protect Philip Island's penguins in the 1980s by buying back all the houses that had been built over the burrows by the 1970s Liberal Government, as well as setting up a world-class international tourism industry that attracts up to one million visitors every year – Victoria could develop a thriving, nature-based First Nations wetlands tourism industry.

The Kerang Ramsar Wetlands of International Importance would become Victoria's Kakadu. The nearby town of Boort, with its Dja Dja Wurrong wetland, which is rich in indigenous cultural heritage, would also attract large numbers of international tourists. The same would apply to other wetlands and regional towns.

Mr Toop, as a longstanding duck shooter, you have a serious conflict of interest and you lack the empathy to understand the terrible suffering that our native waterbirds are forced to endure.

Sincerely

Laurie Levy
Campaign Director

ⁱ Parliament of Victoria, Inquiry into Victoria's recreational native bird hunting arrangements
<https://new.parliament.vic.gov.au/nativebirdhunting>

ⁱⁱ Parliament of Victoria, 'Native bird hunting report released', News release, 31 August 2023
<https://new.parliament.vic.gov.au/news/environment/birdhuntreport>

ⁱⁱⁱ Menkhorst, P.W. and Thompson, L. (2022). Ibid. **Appendix 1** – List of 146 waterbird species, listed as threatened in Victoria, that regularly inhabit wetlands where duck hunting takes place.

^{iv} [Australia's Threatened Bird Index - tsx.org.au](https://tsx.org.au)
https://tsx.org.au/wp-content/uploads/2023/11/Threatened_Bir... · PDF file

^v BirdLife International (2022) Mapping of global threats using the IUCN Red List reveals hunting and trapping is the most prevalent threat to birds.

<http://datazone.birdlife.org/sowb/casestudy/mapping-of-global-threats-using-the-iucn-red-list-reveals-hunting-and-trapping-is-the-most-prevalent-threat-to-birds>

Menkhorst, P.W. and Thompson, L. (2022). Assessing waterbird susceptibility to disturbance by duck hunters in Victoria (2022 update). Arthur Rylah Institute for Environmental Research Technical Report Series No. 338. Department of Environment, Land, Water and Planning, Heidelberg, Victoria.

Menkhorst, P.W. and Thompson, L. (2022). Ibid. Disturbance Ranking for Victorian waterbird species that may be disturbed by duck hunting activity https://www.researchgate.net/publication/363052684_Assessing_waterbird_susceptibility_to_disturbance_by_duck_hunters_in_Victoria_2022_update



**Game Management Authority
Level 2, 535 Bourke Street
MELBOURNE Vic 3000**

Duck And Quail Hunting Australia Victorian Duck Season Submission 2024

Duck and Quail Hunting Australia would like to put forward our 2024 Duck Season Submission.

Summary:

Area-averaged rainfall for November was 61.3 mm, which was 18.1% above the 1961–1990 average.

November rainfall totals were above average for eastern, northern and Western areas of Victoria.

At the end of the month, a deep low pressure system centered over southern New South Wales brought widespread rainfall to the state of Victoria and several sites had their highest November daily rainfall on record.

Some sites across Victoria had their highest total November rainfall on record or their highest total November rainfall for at least 20 years.

<http://www.bom.gov.au/climate/current/month/vic/summary.shtml>

“The Victorian duck season is prescribed under the Wildlife (Game) Regulations 2012 to occur every year between the third Saturday in March and ending on the second Monday in June.

All game species and season lengths in Victoria are legislated, yet the duck season is the only one that undergoes a process of annual submissions and relies on the Ministerial review.

*The duck season needs to stay as to what is **legislated**.*

The Interim Adaptive Harvest Model Specific seasonal arrangements for duck hunting in Victoria are set using the Interim Adaptive Harvest Model (IAHM). The IAHM and a move to a mature Adaptive Harvest Model promise to deliver stable, full-length seasons, with a variable bag limit based on seasonal conditions. Both the IAHM and the AHM are not what's currently legislated.

-Hunting in Victoria, including duck and quail hunting, is a legal and legitimate activity carried out by tens of thousands of Victorians each year. It brings hundreds of millions of dollars annually into the Victorian economy.

-If the duck season is to be altered as to what's already legislated, it should be announced in a timely fashion 2-3 months before the season commences to allowed hunters and business owners, time to prepare for the up coming duck season.

Conclusion:

With Victoria having record-breaking rainfall in the past 12 months making it prime duck breeding conditions. These prime breeding conditions will continue well into next season with more heavy rainfall still predicted to fall.

Duck and Quail Hunting Australia strongly recommend for a

-Full 12-week duck season,

-Commencing at 7am on the traditional third Saturday in March until 30 minutes after sunset on the second Monday in June,

-All the 8 Game species to be hunted throughout the season.

-Ten bird per day bag limit including an additional two Blue-winged Shoveler.

-Plus an additional 5 game species ducks to be added to the bag limit due to hunters having a heavily reduced bag limit the past few seasons, yet hunters are still having to pay full game license fees, which are bases on having a full legislated duck season.

-The Victorian quail season should never be modified based off a duck season submission, and should always stay as to what's legislated.

Rafic Dimachki 13/12/2023

Duck and Quail Hunting Australia

Position Document: Field & Game Australia's Stance on the 2024 Duck Season

Introduction

In response to the Victorian Game Management Authority (GMA) releasing their season considerations document on 19/12/2023 FGA have the following information for consideration by the GMA Board.

Field & Game Australia (FGA) is dedicated to promoting sustainable and responsible hunting practices. This document presents FGA's position, reflecting our principles and past stances.

Emphasis on Scientific and Objective Models

FGA reiterates its support for the use of the Interim Harvest Model (IHM) as a precursor to an Adaptive Harvest Model. We have always endorsed the IHM in principle, recognizing its potential for a methodical, data-driven approach to set hunting season conditions. However, FGA maintains that the current form of the IHM is too vulnerable to subjective manipulation and often seems designed to deliver a preconceived outcome rather than one purely driven by data. We advocate for a model that is rigorously scientific and less susceptible to interpretations that may skew towards expected outcomes rather than reflecting the true state of game duck populations and ecological balance.

Stance Against Political Interference

FGA firmly opposes any subjective interference by political figures or ideological groups in the decision-making process regarding hunting seasons. The essence of the Adaptive Harvest Model is its foundation in objective science. Political influences that divert from this scientific basis threaten the model's integrity and the sustainability of game resources.

Expectation of Prompt Season Announcements

Timely communication of hunting season details is a reasonable expectation of our members. Delays or abrupt announcements cause inconvenience and suggest a lack of organised planning. FGA urges the GMA to seek to ensure that information regarding season openings and regulations is relayed efficiently and promptly.

Advocacy for Sustainable Hunting Practices

We support the framework provided by the 'Conservation and Sustainable-Harvest Models for Game Duck Species' report (Thomas Prowse July 2023). This framework, along with the Interim Harvest Model, is vital in establishing sustainable hunting seasons that balance ecological conservation with the interests of hunters.

Call for Improved Stakeholder Engagement

FGA proposes a more proactive approach in determining and engaging stakeholders, including a review process post-hunting season. Such initiatives are key to identifying and implementing improvements in how hunting seasons are managed. Despite the challenges

posed by external factors, FGA believes in the importance of an inclusive, transparent approach in stakeholder relations.

Commitment to Reducing Waterfowl Wounding

FGA remains committed to promoting responsible and ethical hunting practices, including efforts to minimise wounding. We support education and training in hunting practices that prioritise animal welfare and ethical standards.

Stance on the 8am Start Time

FGA advocates for abolishing the 8am start time for duck hunting, viewing this regulation as unscientific and unnecessary.

Wednesday opening

FGA supports the historical Saturday opening day – However **IF** GMA is committed to continuing their “trial” of a Wednesday opening every year, FGA’s position would be that GMA should release their findings or the outcomes of their trial to support their position.

Comment on Hardhead Duck Populations

Given the current data on Hardhead ducks, FGA support a re-evaluation of their status, potentially removing them from the threatened species list following thorough scientific assessment and re-instating their game duck status.

Assurance on Quail Season

Amid speculation regarding the duck season, FGA seeks assurance that the quail season will proceed as legislated, based on transparent and scientific decision-making.

Conclusion

FGA's stance on the 2024 duck season is rooted in our commitment to sustainable hunting and the preservation of wildlife. We stand for a scientifically informed, unbiased approach to game management and advocate for effective communication and collaboration among all stakeholders. Ensuring the timely announcement of hunting seasons and supporting initiatives like the Waterfowl Wounding Reduction Action Plan are integral to our vision of a responsible and sustainable hunting community.

Lucas Cooke
CEO, Field & Game Australia

Critical Information for the GMA Board
regarding its upcoming recommendation to Ministers
about a 2024 duck and quail shooting season.



By Regional Victorians Opposed to Duck Shooting inc.



***“Long-term loss of waterbirds
has not been reversed.”***

- Prof. Kingsford Gannawarra Times 19/12/23

January 8, 2024

Core Message

GMA must perform its functions under the GMA Act, and recommend full closure of the 2024 duck and quail shooting seasons based on the best available evidence. That evidence shows:

- 1. Alarming long-term decline of game ducks.**
- 2. Lack of breeding in game ducks.**
- 3. Long-term decline in wetland habitat.**
- 4. Long-term decline in Stubble Quail abundance.**
- 5. Significant adverse impacts of duck and quail shooting on protected species, regional communities and the environment.**

Three major indices for waterbirds (total abundance, number of species breeding and wetland area index) continue to show significant long-term declines. Long-term trends are more informative for predicting population status than year to year fluctuations.

Background

The GMA is responsible for promoting sustainability in game hunting, and performing its functions under the GMA Act, specifically to;

- S6 (g): promote sustainability in game hunting, and
- S6 (i): make recommendations to relevant Ministers in relation to - iii) declaring public land open or closed to game hunting, open and closed seasons and
- S6 (h): monitor, conduct research and analyse the environmental, social and economic impacts of game hunting.

S8A requires the GMA to have regard to (b) the principle of triple bottom line assessment, which means an assessment of all the economic, social, and environmental costs and benefits, taking into account externalities and (e) the principle of stakeholder engagement and community participation, which means taking into account the interests of stakeholders and members of the local community.

S8 (1) of the Act requires GMA to perform its functions, (unless otherwise directed by the Minister in which case such directives must be published in GMA's Annual Report).

Regional Victorians Opposed to Duck Shooting Inc (RVOTDS) is a not-for-profit association that incorporated in 2018 and now has over 6200 direct supporters. It is the only stakeholder that speaks first-hand for the long-suffering regional residents and businesses for whom one quarter of each year is virtually intolerable due to the impacts of duck shooting. Our current Board consists of regional residents, landowners, farmers and business owners with a keen interest in the social and economic factors influencing our regions. Not only do we have a firm ear to the ground across regional Victoria, but we also pride ourselves on insights gleaned from significant research. Our input to GMA relating to the factors the regulator is meant to consider according to the Act, is invaluable.

At 3:52pm on December 19, 2023, GMA issued to stakeholders, the information "it will consider" regarding its recommendation to Ministers. Stakeholders were advised "*If your organisation has any additional data that would be of value to the GMA Board in its deliberations, please provide it by no later than Monday 8 January 2024.*"

This document hence outlines critical information pertinent to the GMA Board in its deliberations which has concerningly, not been included in GMA's "consideration documents".

Summary

It's very disquieting that the "considerations" documents circulated to stakeholders regarding the 2024 shooting seasons, failed to emphasise the alarming message of the best available evidence. Nor did they include any information at all, on the following:

- quail,
- impacts on protected and threatened species,
- impacts on community,
- impacts on the environment.

Native Stubble Quail

Last year, GMA issued a recommendation to Ministers regarding a quail shooting season, with no stakeholder consultation. Once again, no information has been presented by GMA in the "considerations" material pertaining to quail. This is not in line with GMA's "commitment to transparency", "stakeholder engagement" or "evidence-based" decision making.

GMA's recommendation regarding a quail shooting season last year was, in the eyes of many, full of unevidenced generalisations, biased, misleading and flawed.

In this document we reference the best available evidence, and request it is reflected in GMA's recommendation to Ministers concerning the 2024 recreational native stubble quail shooting season. In short:

- While only one species of quail is permitted to be shot, there are four other protected species of quail which look very similar. Similar in appearance again, is the critically endangered Plains Wanderer. These non-game species are **unacceptably** at risk in quail shooting seasons because inexplicably there are no species ID tests required of quail shooters.
- Toxic lead ammunition is still used to shoot quail, including on food producing fields. Basic maths suggests tonnes of toxic lead, which doesn't break down, is pumped into Victoria's environment each quail shoot. Evidence shows lead mobilises and enters the food chain. Lead is a significant danger to protected species like the Wedge-tailed Eagle which feed on affected wildlife, and to people. There is no safe limit of lead in a person's blood according to the World Health Organisation¹.
- Stubble Quail Population "counts" have only been undertaken recently. Long-term government "harvest" data however (which the regulator states can be used to ascertain trends in species abundance) points to a significant long-term decline. With increasing fires and floods – both of which impact quail – it is not a time to risk this little bird's populations – nor the populations of its lookalike protected species - with guesswork.

GMA must recommend the 2024 Quail shooting season is closed until the above issues are resolved.

1

<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4961898/#:~:text=According%20to%20the%20US%20Centres,exposure%20can%20be%20considered%20safe.>

Duck

The proposed bag limit of 9 birds a day is completely unacceptable because.

- bag limit is impossible to monitor especially given the thousands of waterways open to shooters, and
- it requires significant costs to taxpayers in attempts to monitor it and
- it makes no allowance for the considerable number of birds wounded or killed and left behind – deliberately or otherwise and
- it results in significant adverse impacts to protected species, the environment in general, nearby families, farmers and other recreational users and
- is not based on the best available evidence, but rather a new and experimental model which, according to the model’s authors, is significantly flawed.

GMA’s focus on relatively new “counts” and this new model (Interim Harvest Model, or IHM) is disturbing, and not in line with GMA’s obligations under the GMA Act. See below comments re “model-based estimates”.

“It is important to clearly identify the uncertainties in the model-based estimates so that their use within subsequent decision-making processes does not lead to unintended population consequences for these species (i.e. determining quotas). Further, Victoria’s game species do not only belong to or solely inhabit Victoria, and the current management system does not consider population drivers or data from outside Victoria.”

[Kingsford-Prowse 2021 review](#) of the Victorian Game Duck Aerial Survey (p 1).

Conversely, the latest (41st) Annual East Australian Waterbird Survey (EAWS) which is the most comprehensive, consistent and long-term independent science available to inform critical waterbirds trends, showed that despite significant rain in recent years, three major indices for waterbirds: abundance, number of species breeding and wetland area index, continue to show long-term decline. Long-term trends are more informative for predicting population status than year to year fluctuations.

It is concerning that the Summary pages of GMA’s Season Considerations bear little resemblance to the Executive Summary of EAWS. In fact they fail to highlight a few key facts:

- Wetland area decreased considerably from the previous year to well below average, and
- Five of eight game duck species continue to show significant long-term decline, and
- Total breeding decreased by an order of magnitude from the previous year and is below the long-term average. 97% of the little breeding observed, was in species other than ducks, and
- Wetland habitat is a major driver of waterbird abundance, breeding and diversity. It is experiencing ongoing long-term decline for several reasons including climate change and
- Long-term trends are more important than year to year fluctuations.

GMA’s summary also failed to mention the shortcomings of the IHM.

GMA makes no mention of Prof. Kingsford’s “tennis ball bounce” analogy² (the bounces in abundance after a breeding event keep getting lower). Nor the fact that long-term loss of waterbirds has not been reversed – Prof. Kingsford, Gannawarra Times 19/12/23.

² <https://www.parliament.vic.gov.au/4afdfc/contentassets/70a387e7b9bc4d88b35cf9fda45cbe26/1.-final-profs-kingsford-and-klassen.pdf>

Social / Economic Impacts

While GMA has made no mention of social/economic impacts, we again include in our submission, significant evidence regarding adverse impacts of bird hunting on regional communities. Part of this is in our latest survey which received 821 responses within three weeks, from people directly impacted.

Impacts to protected / threatened species and the Environment

While GMA has made no mention of these important considerations, we again include in our submission, important evidence relating to these matters, including that obtained via Freedom of Information, pertinent to the GMA Board's deliberations.

Engagement

RVOTDS has previously provided reasons for why the community has lost trust in the regulator's independence and effectiveness. If the GMA Board would like to discuss any of these, or the points contained in this document further, we would be happy to do so.

The Victorian public does not need nor want, a taxpayer funded advocate for the shooting lobby which is seemingly intent on continually trying to find new science to support its agenda. What Victoria needs, is the regulator to do its job.

At the end of this submission is a list of questions sent to GMA, to which we would appreciate a considered response from the GMA Board as soon as possible.

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Continued Alarming Declines in Game Duck Indices, Call for Season Close

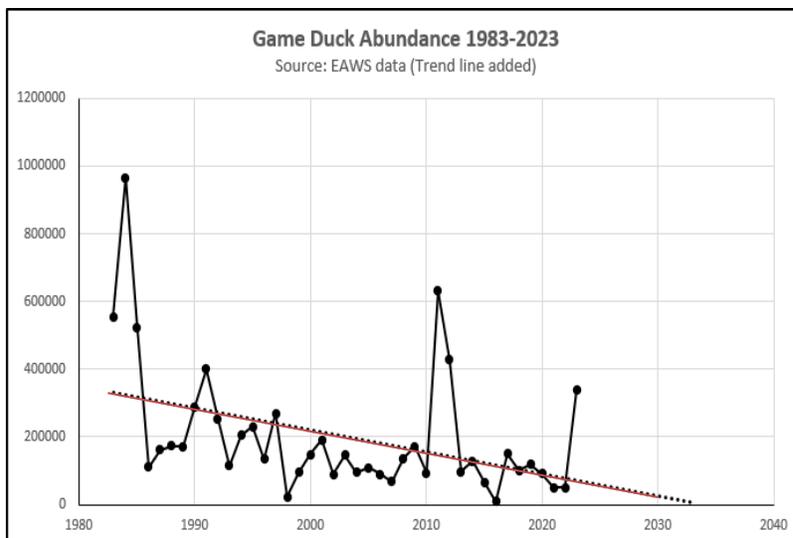
East Australian Aerial Waterbird Survey (EAWS)

The most expansive, consistent, and long-term scientific evidence available to monitor critical trends in game ducks, is not given due consideration by GMA. In particular the below points from the 41st annual EAWS Summary Report are insufficiently (if at all) noted in GMA’s “season considerations”:

- Despite two consecutive La Nina years, three major indices for waterbirds: abundance, number of species breeding and wetland area index, continue to show long-term decline. Long-term trends are more informative for predicting population status than year to year fluctuations.
- Wetland area decreased considerably from the previous year, to well below the long-term average. We note GMA states “Declines in wetland area are likely to result in declines in waterbird abundance, breeding, and breeding species richness.”
- 40% of wetlands surveyed had no waterbirds.
- Global warming continues to influence Australian and global climates.
- Total breeding decreased by an order of magnitude from the previous year and was below the long-term average. 97% of the small amount of breeding noted, was in species other than ducks.
- Ducks are concentrated in two main bands – one being Victoria. This means a shooting season in Victoria unacceptably risks their populations.
- While game duck abundance increased (due to La Nina breeding event in 2022), five out of eight hunted species continue to show significant long-term declines. They are Pacific Black Duck, Australasian Shoveler, Grey Teal, Mountain Duck and Australian Wood Duck. Mountain Duck declined in abundance from last year despite La Nina.

Two others such as Hardhead have always been, and continue to be, low in abundance. Chestnut Teal, aside from a single spike thanks to La Nina recently, has been low in abundance for around three decades.

We urge the GMA Board to familiarize itself with the sobering graphs for each species in the EAWS [Summary Report](#). *Of particular concern is the Mountain Duck.*



Left: Trend for *all* game ducks.

While game ducks finally increased as a result of significant rainfall in recent years, the “tennis ball bounce” is getting lower each time.

The trend line is alarming and should have been given more focus by GMA.

Interim Harvest Model (IHM)

It is appalling that taxpayers have been forced to fund an additional new “model” to determine bird shooting seasons, when we already have over forty years of consistent and comprehensive independent scientific data showing what is happening with all relevant duck indices, including at species level, via the EAWS. (Perhaps if the EAWS was showing prolific duck populations, shooters would have accepted it and saved our money.)

It is highly concerning that GMA appears to be placing significant emphasis on this relatively new and experimental model, which is unable to provide critical insights at species level, and is based on the last 30 years of data which have resulted in the long-term decline of game ducks!

GMA has failed to mention the IHM’s limitations in the considerations. For a start, the model’s authors stipulate that because it is a historically statistical model, if any past parameter changes (as climate is doing), then it is less reliable.

The model’s authors also stipulate it is “only a model”³ to be used alongside “due diligence”. (However GMA does not seem to have much to report by way of due diligence – or it prefers to ignore better evidence - as our submission details).

The IHM failed last season. The take was 68% above the “sustainable” limit. GMA has not mentioned this.

The model does not account for the significant number of wounded birds which are an unavoidable result of duck shooting. Nor does it consider impacts of hunting on protected / threatened species, nor the environment (toxic lead and plastic shotgun components), nor the non-hunting community (vast majority of Victorians) – all of which are impacts the GMA is supposed to be concerned with.

The IHM relies on EAWS to an extent, but also on more dubious “counts” which take place at a fraction of the wetlands covered by EAWS, let alone a reasonably indicative percentage of all shooting waterways.

One such count, the Summer Waterbird Count (SWC) now rebadged as the Priority Waterbird Count, has been conducted since 1987 by a mixture of departmental staff and “volunteers” – mainly shooters. Government resources were restricted over time, and the number of wetlands surveyed declined considerably, from a peak of 786 (1991) to 126 (2015) to just 44 now, out of tens of thousands of public waterways open to shooters. **As there is no obvious consistency in the coverage of the state’s wetlands, this series of counts is of little scientific use.**

A further concern is the skill and objectivity of those doing the counting. Did all departmental staff pass a WIT test? Who checked that the “volunteers” from Field & Game Australia (FGA) and the shooters within the public sector were not over-estimating the numbers in the hope of a more generous season? Perusal of FGA annual reports shows that in Nov 2018 their volunteers allegedly counted more than half a million game ducks, an astonishing feat, given that the record February count from the SWC (1991) was only 414,417 game ducks.

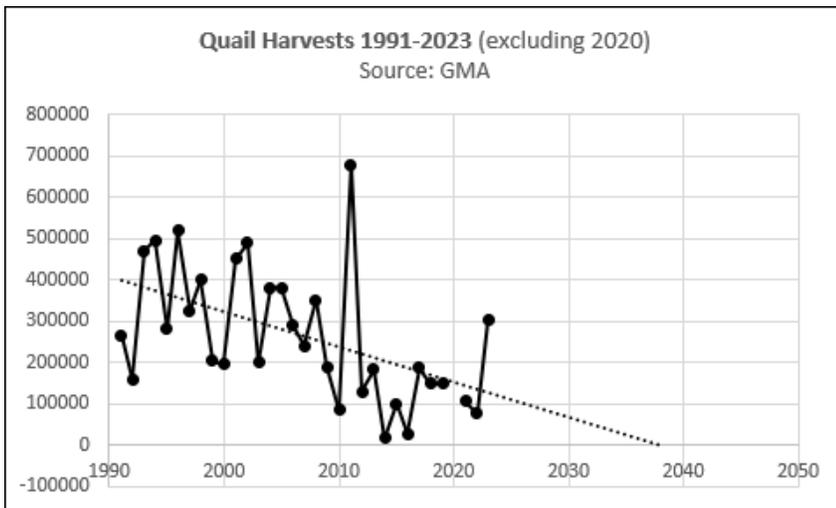
The GMA Board must disregard GMA’s “Summary” which appears biased and misleading, and focus attention on the **Executive Summary of the EAWS – the most comprehensive, consistent, independent long-term science.**

³ https://www.gma.vic.gov.au/data/assets/pdf_file/0006/863610/Combined-Final-Report-and-Attachment.pdf (see p20).

Alarming Quail Shooting Considerations

It is disappointing that once again, there has been no transparency of quail shooting season considerations. Last year GMA gave the green light for another full shoot without stakeholder consultation, and no regard it seems, for evidence regarding populations, impacts to threatened species or the environment. We believe this is a failure of GMA's duties under the Act. It is certainly not conducive to developing trust in the (non-shooting) community.

Here we present evidence of why the GMA Board should recommend the 2024 Quail shooting season be closed.



Left: government harvest data shows a clear and alarming downward trend in native Stubble Quail take.

”Long-term harvest records can be used as a proxy to monitor abundance”.

- ARI/GMA

*Note a “spike” in 2023, likely due to shooters aware of the Parliamentary Inquiry, wanting to make these numbers “look better”. This data is offered by shooters on a voluntary basis and not checked for accuracy.

This 2023 anomaly makes little difference to the long-term decline.

Long-Term Declines in Quail Abundance

Population counts have only recently taken place (presumably as a result of our bringing focus to the fact they did not exist).

The first ever "count" of the species in 2022 found just 101. This tiny number was extrapolated up to an unbelievable figure of 3 million, with a very high “uncertainty” coefficient of variation (0.29). Dr Ramsay - the report's author - has previously stated that if this coefficient exceeds 0.15, the exercise becomes unreliable. Therefore, the estimate of 3 million quail was not able to be relied upon – which is not a surprise to regional landowners who say there are “hardly any quail left”.

Since this first- ever “count”, there was unprecedented flooding in Victoria's quail habitat areas. Flooding adversely impacts quail populations (Frith and Carpenter 1980).

A second "count" was performed across more locations in early 2023 which allegedly found around 400 birds. This was extrapolated up to an incredible 7 million, and miraculously the error margin changed to exactly 15% (after we drew attention to it?) The second count was really the first, given the previous year's limitations.

In the absence of any reliable long-term population “counts”, the only data available on quail populations is the annual harvest toll. An email to RVOTDS from GMA in September 2022, advised “long-term harvest records can be used as a proxy to monitor abundance”.

The shooter survey to obtain this harvest data commenced in 1991. The quail graph above shows that the median toll was around 320,000 for the two decades to 2011. In 2011 there was a record toll, presumably due to the breaking of the Millennium Drought and the improvement in habitat.

By referring to the annual reports available on the GMA website, it is clear to see that subsequent tolls are much reduced. (With the exception of 2023).

Although the data collection changed from a mail survey to a phone survey from 2009 onwards, an unpublished paper from ARI (refer p19) reconciled the two sets of data and showed a clear downward trend from 1991 onwards⁴. Clearly our quail are in alarming decline.

Even the 2012 Regulatory Impact Statement (RIS) acknowledged the “probable declining population” (p117). The RIS acknowledges (p117) some factors contributing to species decline, including changes to agricultural practices and use of herbicides that reduce available habitat. However, climate change is now known to be highly relevant also.

Significant Adverse Impact to non-game species of quail shooting.

There is only one species of quail allowed to be shot. However this one species closely resembles another four species of quail which are protected, as well as the critically endangered Plains Wanderer.

There are no species ID tests for quail shooters. Add in the fact that quail are often shot in poor light conditions. What could possibly go wrong?

Unfortunately GMA has little if any data on this. However if we look at the best available evidence, which is the data the previous regulator collected regarding non-game species shot during duck shooting (see p 14-18), it is highly probable there is a significant impact to non-game species during quail shooting.

Toxic lead ammunition.

Is still used in quail shooting. Basic math applied to government fact sheets, suggests tonnes of toxic lead ammunition is pumped into our environments (including food producing) each quail shooting season. See p 12.

Timing Clashes with Breeding.

Notably, CSIRO scientists found that quail breeding frequently extends into April, and April often finds many young birds still unable to fly strongly. Why has GMA recommended quail shooting take place April to June?

Given the evidence which suggests quail populations are declining, the increasing weather events negatively impacting quail (including current floods), the obvious risks to protected and threatened species, as well as the environment from toxic lead ammunition, the GMA Board must recommend the 2024 quail shooting season be closed.

⁴ https://www.gma.vic.gov.au/_data/assets/pdf_file/0014/503150/Deer,-duck-and-quail-harvests-1985-to-2015-FOR-WEB.pdf

Further critical factors which support a season close for 2024

Concerningly, the below factors do not form part of GMA's Season Considerations either:

1. Long-term effects of climate change which are predicted to worsen.
2. Birds' unique susceptibility to climate change.
3. Threat to migratory birds already experiencing significant decline.
4. Detrimental impact of shooting monogamous bird species.
5. Adverse environmental impacts of plastic shotgun components and toxic lead ammunition (still used legally in quail shooting and illegally in duck shooting).
6. Lack of data regarding bird species present on wetlands prior to shooting.
7. Lack of data of birds shot during duck season.
8. Impact of shooting on protected & threatened species.
9. Shooters' critical knowledge gaps as proven by recent tests.
10. Unavoidable wound rates.
11. Adverse social/economic impacts of bird shooting on the wider community.

The above points are detailed as follows:

1. The long-term trend of climate change and its impact on our waterbirds is rarely if ever 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 unlivable 4°C rise in the next 80 years. The consequences for our wildlife will be catastrophic. Birds are especially vulnerable (see point 2).
2. No consideration has been given by GMA 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](#)). Quail populations are particularly susceptible to floods⁵. With climate change predicted to only worsen, it is obvious our already struggling bird populations require protection from recreational shooters.
3. Shooting disturbance at Victorian waterways adversely impacts migratory birds' 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 them⁶

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. 6 Jan 2022

https://www.gma.vic.gov.au/assets/pdf_file/RS... PDF

[Duck hunting season 2022 - Game Management Authority](#)

⁵ Frith and Carpenter 1980

⁶ <https://www.environment.gov.au/biodiversity/migratory-species/migratory-birds>

4. No consideration has been given by GMA to the ripple effect through bird species most of which form life-long pairs - in fact, 90% conduct joint parenting. 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, is far larger than just the "harvest" numbers reported. Refer [this article](#) by Professor Kaplan, just one of numerous avian experts never consulted by GMA.

5. Adverse environmental impacts – Lead and Plastics:

Lead ammunition is still used legally in quail shooting and illegally in duck shooting as is reported most years. Lead is extremely toxic to ecosystems, animals and people even in tiny traces (emedicine.medscape.com/article/1174752). The World Health Organisation now states there is NO safe limit of lead in a person's blood⁷. It is an insidious poison causing extreme suffering to animals who ingest it, such as dabbling ducks, swans and secondary predators like protected eagles⁸. Given the long-term decline in breeding of our game ducks, why has GMA not considered the fact that lead also inhibits waterbirds' breeding? Refer this [short webinar](#) by Dr. Ruth Cromie – Head of Ecosystem Health, Wildfowl and Wetlands Trust (WWT).

GMA would be aware of the [EPA analysis of a small number of Victorian wetlands in recent years and the toxic lead levels found in ducks](#) (well above safe food guidelines) at twenty percent of these wetlands. This percentage is truly frightening when one extrapolates what it means across the thousands of shooting wetlands around the state.

According to a Department of Sustainability & Environment report (Flora and Fauna Guarantee Action Statement # 32), each ammunition cartridge holds 30-45g of lead. Multiply 30g by the average number of 175,000 shot quail each year in Victoria (GMA harvest estimates) and one gets a staggering 5 tonnes of lead potentially pumped into Victorian (including food-producing) environments each season - without even adding in the lead deposited by missed shots or used illegally in duck shooting.

There is evidence that lead "mobilises" and enters the food chain. Also, that it inhibits plant growth⁹ and milk production in cows. (Guitart and Thomas 2005, Dickerson et al 2007).

A [2018 CSIRO study](#) was scathing of Australia's failure to take seriously the risks to humans, animals and the environment from lead ammunition.

GMA's own Simon Toop is well aware of the lead toxicity impacts of hunting, having been involved in the recent [study](#). In particular the finding:

"The quantity and characteristics of lead ammunition residues found suggest that predatory and scavenging wildlife and some groups of human consumers will be at risk of negative health impacts."

It is disappointing it seems to have taken RVOTDS to draw attention to the lead issue which has finally instigated a study by GMA. However studies had already been done. GMA must cease spending taxpayer funds on superfluous studies and instead do its job – that is, heed existing studies' results and recommend shooting seasons are closed. GMA must cancel the duck and quail shooting seasons for the toxic lead impacts alone under the precautionary principle, or risk litigation for negligence.

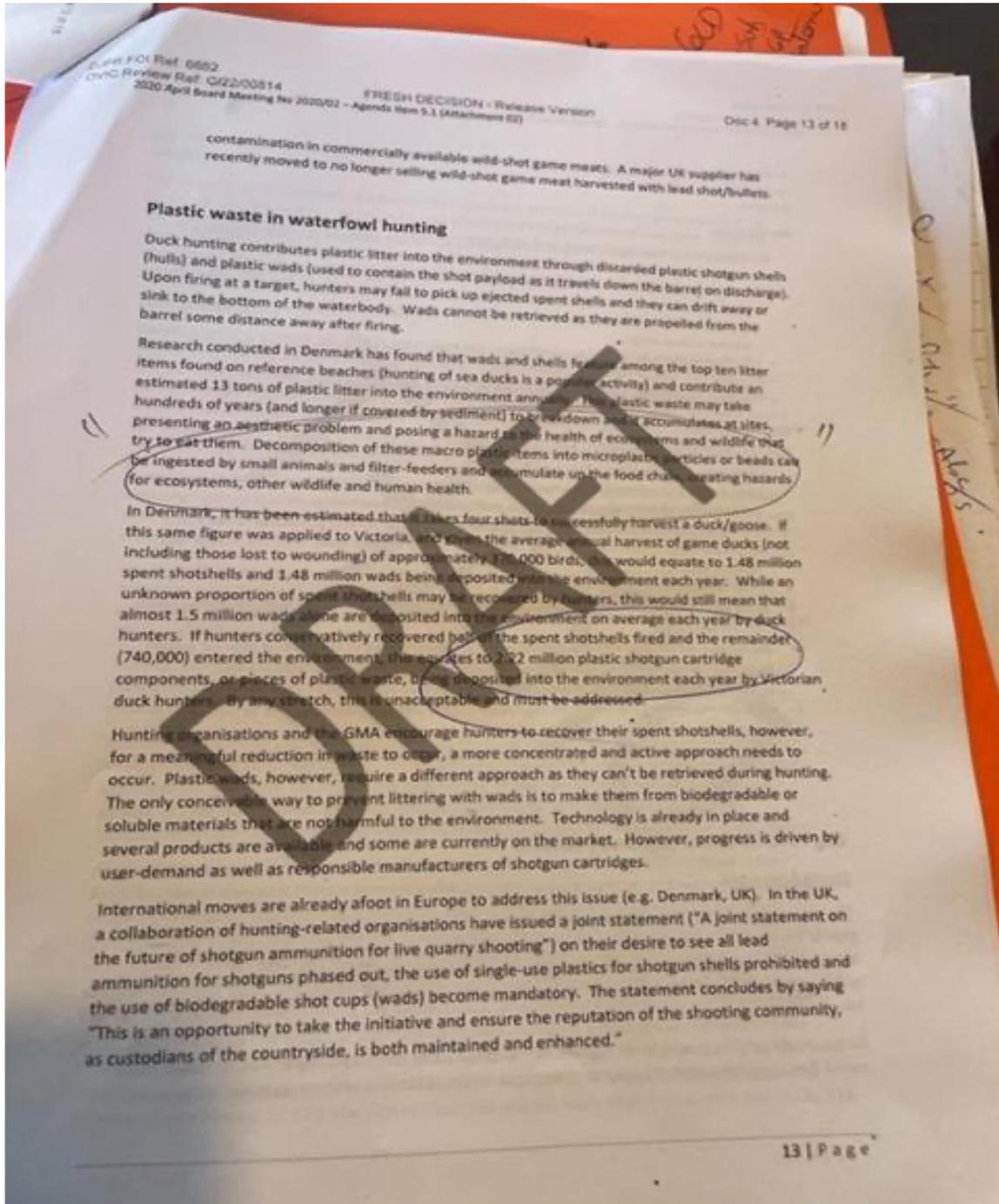
⁷<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4961898/#:~:text=According%20to%20the%20US%20Centres,exposure%20can%20be%20considered%20safe.>

⁸<https://www.sciencedirect.com/science/article/pii/S0269749123010060>

⁹https://whc.vetmed.ucdavis.edu/sites/g/files/dgvnks5261/files/local_resources/pdfs/lead-hunting-wetlands.pdf

Millions of Plastic Cartridges and Wads

A GMA Board Paper recently released under Freedom of Information states 2.2 million shells and wads are pumped into our environment each year just from duck shooters (excludes what would be pumped into it by quail shooters). Like lead, plastics can take hundreds of years to break down, posing a serious risk to people and animals as they enter the food chain as microplastics.



Above: screenshot of relevant page of GMA Board Paper recently released under FOI, discussing plastic pollution from duck shooters.

6. 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. This number has dropped to just 44 “priority wetlands”- grossly insufficient considering there are thousands of shooting areas. GMA has been unable to list, map or even estimate the approximate number of the thousands of public waterways where unmonitored shooting is allowed. How can anyone possibly know what may be present on them?

It's fair to say the regulator has no real idea of what birds are present at the vast majority of wetlands open to shooters. It is the epitome of irresponsibility to continue to allow shooting in these circumstances and ludicrous to suggest “sustainability” can be ensured with such a gross lack of critical data.

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

GMA’s own “Season Considerations” documents usually state “To effectively manage game species, it is important to accurately quantify the number of animals harvested”. Yet this is never done. Despite GMA receiving millions more in taxpayer funds, there is a gross lack of monitoring. It is simply not possible to monitor the vast number of waterways where duck shooting is allowed. It is therefore not possible to know how many, of what species, threatened or otherwise, are shot across Victoria each duck and quail shooting season.

Estimates of numbers of game birds bagged by shooters are not only based on a survey of a small number of shooters extrapolated out assuming the entire duck shooter base would be the same (unlikely), but reliant on shooters’ memories and honesty. The error margin is unacceptable. Estimates obviously do not include the significant number of birds shot and left behind¹⁰ (whether deliberately or not) and do not include the ripple effect through a species of losing one of a monogamous pair. They also of course do not capture the impact on protected species.



Australian Shelduck, monogamous, found shot and abandoned at Kerang during the 2023 duck shooting.

¹⁰ <https://www.rspca.org.au/take-action/duck-shooting>

8. Impact of shooting on non-game species.

Given its requirements under the Act, it is of serious concern that GMA do not care more for impacts of hunting on protected and threatened species, which are evidenced each season, and recommend closure of future seasons. Just a few examples follow:

https://www.theage.com.au › National › Victoria
Protected birds shot - The Age
26 Mar 2013 — Several hundred birds, including rare and protected species, were shot at a

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 2016)

Australian Broadcasting Corporation
https://www.abc.net.au › news › duck-hunting-season-...
Duck shooters accused of inhumane activity during ...
22 Mar 2022 — Animal activists say they found 23 dead birds buried in a pit on the opening weekend of the duck hunting season; Gannawarra police and the Game ...

https://au.news.yahoo.com › terrible-tragedy-unfolding-...
Threatened species gunned down during duck season
17 Mar 2022 — Under Victorian Government guidelines, shooters have a “bag limit” of four ducks a day and must make “all reasonable efforts to immediately ...

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)

https://www.wildlifelifevictoria.org.au › Publications PDF
Day two of duck shooting reveals the brutal truth
17 Mar 2022 — duck hunting season, threatened species and non-game water birds have already been illegally shot while other ducks have been left to die a ...

5 days ago — Victoria’s environment minister is being called on to suspend the 2023 duck season after a threatened species was found inside a tree hollow ...

Gippisland Times
https://www.gippislandtimes.com.au › News
Illegal duck hunting reported locally
3 June 2021 — The Gippisland Times understands while the behaviour was reported, police did not attend the scene. The Game Management Authority is the control ...

https://www.weeklytimesnow.com.au › news › news-story
Duck hunting: Hundreds of protected birds shot in Victoria
2 Nov 2017 — VICTORIAN hunters started illegally shooting before the 2017 duck hunting season opened, killing 260 protected species and dumping more than ...

HERALDSUN.COM.AU April 28, 2023
‘Carnage’: Residents shocked by brazen hunters
There has been “carnage” on the first day of the Victorian duck huntin...

The Age
https://www.theage.com.au › ... › Victoria › Victoria Police
‘Coked-up shooter’: Police seize guns, drugs on day one of ...
20 May 2020 — Police have seized guns and drugs from a recreational duck hunter from Melbourne and suspended his game shooting licence after finding him ...

Sporting Shooter
https://sportingshooter.com.au › news › duck-hunters-...
Duck Hunters Using Lead Shot To Have Their Licence ...
21 Apr 2022 — The hunters received fines and had their Game Licences suspended ...

Herald Sun
https://www.heraldsun.com.au › Leader
Launch of duck hunting season enrages animal activists
2 days ago — Threatened birds were brought to Wildlife Victoria vet tents “semi-butchered” on the first day of duck hunting season. ... Protected animals and ...

Above: some of the headlines which made media. Most don't.

Data Regarding Impact on Protected Species, Compiled by Previous Regulators

The shooting of protected / threatened species has been occurring for decades. RVOTDS obtained via Freedom of Information (FOI), data collated by previous regulators which shows a sample of the protected species killed in duck shooting seasons in Victoria (sample six years to 1993).

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

← Numbers of protected species found dead at just some of the Victorian duck shooting wetlands 1988 – 1993. Note the introduction of the Waterfowl Identification Test (WIT) in 1991 made little difference.



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

972 protected species found dead at several Victorian wetlands in duck shooting season 1993, including Australia's rarest native duck – the Freckled Duck, thought to be one of the world's rarest, galahs, magpies and ibis.

***Note 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 are not monitored.**

Failure of GMA to Maintain Data Regarding Impact on Protected Species

An email to RVOTDS from the CEO of GMA, states the numbers of protected species illegally shot each season these days are not quantified. This horrific fact is confirmed by Arthur Rylah Institute (ARI) which says regarding 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”.

– ARI 2019 “Waterbird Susceptibility to Disturbance from Hunting”

Evidence presented every year by volunteer rescue groups, together with the evidence we present in this document, including by way of data obtained through Freedom of Information, shows the unacceptable impact of bird hunting on protected and threatened species.

By continuing to allow recreational shooting of ducks and quail at so many locations it can't possibly be monitored, GMA is at odds with the GMA Act, and with any attempts to enhance public confidence in its effectiveness.



Above: Whistling Kite, protected species, found illegally shot during duck shooting.

9. Shooters' knowledge gaps – a further risk to protected species.

According to GMA's recent knowledge surveys:

- 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.

10. Unavoidable Wounding Rates

Generally the duck wounding rate is referenced as being anywhere between around 25-33%¹¹, although GMA's own Wounding Reduction Action Plan suggests the wound rate (non-kill) could be as high as 80%. See below:

Based on GMA's data and descriptions in section 5 of the WRAP: To calculate the "crippling ratio" (number of birds wounded for each bird bagged) based on first year ducks (GMA, Monitoring Trends in Waterfowl Wounding 2022, p2):

- Percentage x-rayed with shrapnel = 7.5%
- 2022 harvest = 262,567
- Estimated duck population at season start 2.9m (according to GMA's helicopter count)
- Harvest rate = harvest / population at start of season, so $262,567 / 2.9m = 0.09$
- Crippling rate = wounding rate / harvest rate, so $0.075 / 0.09 = 0.83$.

**NB this does not account for the birds that had already died from their injuries.*

Whilst this figure may seem high, the crippling rate reported in Denmark prior to their robust testing measures, was 1:1.

It should be noted the wound rate is not possible to resolve. It took the Danish government a quarter of a century to reduce their 1:1 wound rate down to 10%. If Victoria were to implement the strict testing which the Danes did (and frankly given the apathy demonstrated by Victorian shooters to accuracy testing, it is likely to fail), it would be the year 2047 before we got to 10% which incidentally still means at least 37,000 wounded birds each year (GMA harvest data).

¹¹ <https://www.ava.com.au/policy-advocacy/policies/hunting-and-fishing/waterfowl-hunting/>

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

One in every four Victorians now lives regionally, with an increasing number of metro visitors to our regions. Yet there has never been any risk assessment, not even desk-top studies to attempt to consider the impact of hunting on the 99.8% of Victorians who do not shoot birds.

In the absence of studies into this critical issue by the government or GMA, RVOTDS has run several [surveys](#). Our [latest](#) (involving 821 participants directly impacted) highlighted the following:

- More than half said they had concerns for safety due to (largely unmonitored) duck or quail shooting occurring nearby.
- More than half said they had suffered stress or anxiety due to bird shooting nearby (either because they lived near it or were in the area).
- Over a quarter said they had witnessed what they believed to be illegal hunter behavior such as trespass, littering, shooting in the dark, leaving wounded birds, shooting protected species, removing habitat, leaving campfires unattended etc.
- 82% of those who made a report to authorities said they did not feel their complaints were dealt with satisfactorily.
- Over 90% do not believe bird shooting has a net benefit to their community.
- 92.4% believe there are better ways to spend taxpayers money (than support bird shooting).
- Nearly forty percent said they lived within 3 kilometers of bird shooting (within which shotgun noise is audible). Almost a quarter (22.7%) said they lived within 1 kilometer of bird shooting and 16% within 350 meters.

As our surveys show, adverse impacts of bird hunting to community include:

- Inability to work from home.
- Inability for shift workers to sleep.
- Noise pollution (EPA issued a safety warning about the use of gas guns which are not as loud and not used as frequently or for as long a duration as shotguns are during duck shooting.)
- Loss of amenity.
- Lost tourism.
- Distress to children, stock and pets.
- Pellets on roofs which collect water supplies.
- Hunters trespass.
- Safety risks of firearms in public places

Safety Risks

The concerns for safety are valid. 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 health and safety risks to mental health of noise pollution and feeling anxious/stressed for extended periods of time should not be underestimated.

“The shooting season in its current format is completely at odds with the growth of adventure tourism. How can we possibly manage a safe tourism activity, when a shooter can come and set up on any waterway. The shooters need to be regulated to only be able to shoot in certain areas and keep very separate from other tour ventures. My question to the regulators, is “Who has the right of way” (same as any waterway) Do our paddlers need to leave the water when a shooter is present or does the shooter need to leave. You currently have no guidelines and you have no safety signage to provide a rule for right of way.

There is a liability that must be owned by the regulators when on water activities come close to shooters, firing out into the waters.

I draw your attention to places like the Cohuna Town Lagoon (where we regularly operate), this is within 2km of a town centre, and is used extensively by boaters, paddlers, fishers and even swimmers. How can you possibly add shooters into this mix for several weeks of the year. You have NO warning signs, you have no guidance and you clearly have not stipulated a right of way.”

Shannon O’Brien Managing
Director Sydney Harbour
Kayaks Murray River
Adventures
Member of the NSW Transport Minister’s Maritime Advisory Council Member

Economic Impacts

The widespread belief amongst regional communities that bird shooting is not of economic benefit is supported by independent economists such as The Australia Institute¹², Dr Kirsty Jones (Monash University) and VEAC Red River Gum Investigation reports which show duck shooting is detrimental to rural economies.

Data just released by Tourism Research Australia (TRA) shows outdoor nature activities continue to be far more popular, and generate higher economic returns, than outdoor sports. Hunting is not classified by TRA as a nature activity. But birdwatching, one of the fastest growing and financially lucrative pastimes in the world, is.

Tourism Research Australia’s data recently released for year ending June 2023 shows outdoor nature-based activities remain by far, the number 1 most popular activity outside of social activities such as visiting friends/family, eating out.

Victoria is still running behind NSW and Qld for number of visits, number of accommodation nights, and associated revenue. While \$7 billion came to Victoria, \$14 billion and \$12 billion went to QLD and NSW respectively.

Domestic tourists who birdwatched brought a whopping \$454 million to our country for the year-ending June 2023. More tourists birdwatched than visited the reef or went dolphin / whale watching.

But domestic tourism is only part of the equation. Pre-covid, three times as many international tourists (6.6 million), relished an outdoor nature activity as opposed to outdoor sport. Almost one in ten birdwatched and spent a staggering \$2.6 billion, or 8% of our total international tourism revenue.

¹² <https://australiainstitute.org.au/post/economic-benefits-duck-shooting-ban/>

Conversely, the latest survey summary report by DJPR showed duck shooting expenditure (according to shooters) dropped 46% from 2013 to 2019. Quail shooting expenditure fell 58%. The recent economic analysis by the Parliamentary Budget Office (PBO) put duck shooters at a potential net spend of just \$4m - 10 m. (Neither the DJPR study nor the PBO's analysis accounts for the costs associated with duck shooting like compliance monitoring, or research, lost tourism, or lost productivity. It is therefore likely the true impact of bird shooting is negative.)

It is ludicrous that less than half of one percent of the population who hunt ducks, have access to do so at so many thousands of our public waterways that authorities can't estimate their number. Hunting has been shown repeatedly, to deter tourism¹³.

"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."



In closing

[In 2020, fifteen organisations](#) including leading conservation, environment, regional and animal welfare groups provided statements / submissions to GMA calling for a season close. They were ignored.

In 2021, Over 44 major business, union, environment and wildlife organisations signed on to our "Alliance" advertisement which ran in several major newspapers. They were ignored also.

[In 2022, the number of First Nations Clans, business, union, environment and wildlife groups willing to publicly support our stance grew further – to 91.](#) Their members and supporters number in the hundreds of thousands. It's time GMA properly considered community.

The GMA should, in line with its functions and obligations under the Act, recommend closure of the 2024 duck and quail shooting seasons until all of the serious adverse impacts evidenced in this submission are effectively removed.

¹³ A Poll conducted by UComms found most people would avoid holidaying in an area where there was shooting. Recent research conducted for RSPCA supported that finding.

Appendix

Community Trust in the GMA - Why it falters.

In 2021 we witnessed a government backflip on bag size, from 2 to 5, apparently based on a first ever helicopter survey. We are still waiting on the key “evidence” GMA used in their decision. RVOTDS requested it through Freedom of Information in 2022. Despite the Office of the Victorian Information Commissioner ruling the documents should be released as they were in the public interest, to this day GMA refuses to do so, and has instead applied to VCAT – at taxpayers’ expense– to fight their release. So much for “transparency”.

GMA never includes information on impacts to threatened species, the environment or community, in its “season considerations”. Similarly, GMA dismisses all relevant evidence put to it, in its recommendations to Ministers. Despite these being issues the regulator is tasked with considering, it could not appear less interested in them.

GMA is aware that two wetlands in Mildura were closed to duck shooters for safety reasons in 2019. Yet GMA has refused to consider making recommendations to close other shooting wetlands despite repeated community (and council) requests. This is even though there are so many thousands of public waterways open to shooters they can’t possibly be monitored. Nowhere in the GMA Act, nor any other relevant legislation, does it state that GMA cannot recommend closure of wetlands to shooting due to impacts on the community.

GMA says it’s not its responsibility. But the Act appears to say otherwise.

GMA is unable (and unwilling?) to manage a large percentage of complaints made to it. GMA does not include statistics on many complaints made to it, including landowner complaints, in its recommendation to Ministers, conveying a message of shooter “compliance” which is false and misleading.

Unfortunately, many members of the public do not bother making reports to GMA about illegally shot non-game birds, because unless those members of the public managed to obtain photo ID or licence registrations of the offender (that is, likely put themselves in danger), the regulator dismisses the incident. See the example below of a little Grebe that was proven to have been shot.



Grebe chick found illegally shot at the 2023 duck shooting season – handed to GMA with evidence, but the case was dismissed.



This was GMA's response:

On 29 April, the GMA was contacted by a veterinarian to report she was in possession of a Grebe that had been found by herself and two others on the shore of Lake Bael Bael on Thursday 27 April 2023.

It was organised with a GMA Officer to hand the grebe over, as she had just conducted an X-ray on the carcass which showed 7 shotgun pellets lodged in the body of the bird. A mountain duck was also handed over at the same time. The GMA officer was informed that the Grebe had been located in the reeds. The bird was stored securely at the Kerang Agriculture Victoria depot while inquiries were made based on the information provided to the GMA by the veterinarian. The inquiries were not able to produce evidence as to whom may have shot the bird and the case has now been closed.

Regards



██████████
Chief Executive

████████████████████
www.gma.vic.gov.au



We acknowledge Victorian Traditional Owners and their Elders past and present as the original custodians of Victoria's



Regional landowner complaints have not been followed up. GMA has shown little if any interest in impacts of hunting to regional communities, in suspected illegal activity, even complaints about what appears to be improper conduct of GMA staff. Instead, our members have felt dismissed, even bullied by GMA.

Add to this a failure to keep any real data on what protected and threatened species are collateral damage in duck shooting, you can see why community lacks trust.

This year once again, the regulator appears to have cherry picked information it will “consider”, emphasizing the IHM (which virtually guarantees a bird shooting season irrespective of environmental or other factors) while failing to mention the IHM's limitations, and de-emphasizing (even omitting to mention,) the key points of EAWS.

With this history, we have little confidence that the GMA will provide an unbiased recommendation and we ask the GMA Board to take full ownership.

Please note GMA's use of language also adds to the perception they are not “independent”, but rather an advocate for the shooting lobby. The word “harvest” is improper use of the English language according to at least six different dictionaries. GMA must replace it with “Kill”. Similarly, referring to bird shooting as being of “economic benefit” or “popular” is factually incorrect and highly misleading.

Questions for the Board

- Where does it state that GMA can only consider environmental factors when making recommendations to Ministers about open/closed seasons or public land open to hunting?
- What has GMA done to monitor, conduct research and analyse the social / economic impact of game hunting since its inception in 2014? (GMA Act s6 h).
- In the 2020-2022 SOE the Minister expressed her expectation that GMA would build its knowledge of the community effects of hunting. Could you please advise how this occurred in the context of all the associated surveys and petitions we have provided to GMA?
- On p.9 of your Annual Report you state "The impacts of hunting on non -game species, and on the environment is considered in our decision making". However there is nothing mentioned about impact to non-game species or of lead or plastic shotgun components in GMA's latest "Season Considerations". Could you please explain why? Will it form part of GMA's recommendation to Ministers, as it hasn't in the past?
- GMA's Annual Report lists "field surveys" of game ducks and stubble quail. Could you please advise who undertook / participated in these surveys and how many were hunters / associated with hunting, compared to how many were from BirdLife Australia?
- The 2022/23 GMA Business plan refers to a "revised stakeholder engagement strategy, ie a stronger focus on building connections with regional communities and traditional owners." Could you please advise which traditional owners and regional communities have been engaged with and who at GMA will do the engaging - the Board? Are the details and progress of this engagement strategy public?
- In her foreword in the Annual Report, the Acting Chair refers to GMA's "commitment to transparency". We understand the Acting Chair is aware that GMA has applied to VCAT to prevent release of documents which OVIC ruled were in the public interest. How does she justify the VCAT application and associated costs to taxpayers?

Letters

Duck hunting effect out by a country mile

Imagine if farmers had a scientific model to maximise their production for the next 50 years. Ludicrous?

But shooters are crowing about a new (taxpayer funded) computer model that claims to do just that for duck "harvests". What a waste of taxpayer funds that should be spent on our roads or biosecurity.

There's also a computer model to predict bag size. Last season it was so far out that the "harvest" was up to 68 per cent over the "sustainable" limit.

It's based on the northern hemisphere assumption that changing the season length won't change the number of ducks killed.

That worked well in Australia, didn't it?

These fancy computer models delight the armchair scientists in the hunting fraternity.

But Professor Kingsford is famous for his statement that duck "rebounds" after rain are like a tennis ball – getting smaller each time.

The latest Eastern Australian Waterbird Survey shows that is clearly the case after the recent La Nina cycle.

But sustainability is not the only issue in duck shooting. Most regional folk are sick and tired of the cruelty and the disruption to our family and business activities.

We trust the government will act quickly to implement the ban recommended by its recent inquiry – or was that just another waste of taxpayer funds?

**Karen Mander,
Castlemaine**

Summary of 2023 Community Survey Responses

Negative Impacts of Bird Hunting: Environmentally, Socially and Economically

We can hear shooting from our place of residence. Stressful to be woken by what sounds like cannon fire and to know defenceless ducks are being killed maimed and their habitat disturbed. Our favourite past time is kayaking and bird watching at Cairn Curran which is not possible during duck hunting season.

Being woken by gunshots pre-sunrise, the distraction of the shooting and distress of knowing our wildlife are under attack is greatly detrimental to my ability to concentrate while working from home.

Duck shooting restricts my ability to travel to wetlands during duck season. Observing wildlife at wetlands is a major part of my life.

I have duck shooters trespassing onto my private land to shoot over the irrigation channels and dams, putting my livestock and children at risk of flyer pellets and downright reckless shooting. They also leave their shotgun was laying around, where livestock may find, chew and choke on them.

Constant early morning gun shots upsetting the dogs and myself. Dead ducks left floating in the creek. Shotgun cartridges left on the creek bank. Gunshot pellets landing on our roof from shooters shooting into the air on the creek at the back of our house.

I am uneasy about what is going to be shot along with the ducks. My cat was taken to the vet to have pellets removed and was ill for some time.

I usually really look forward to celebrating ANZAC Day. This year it is coming with dread. The next day the guns will start. I live in Bairnsdale Victoria with the Macleod Morass Wetlands nearby. We can clearly hear guns firing from our house and yard. It distresses me that every shot heard is being fired at the ducks. We have so many beautiful birds in the East Gippsland Lakes. I can't imagine the distress this noise causes them. I haven't witnessed visually the cruelty by the shooters as the general public are forbidden to enter the nearby wetlands during hunting season. I think this is disgraceful as we are the rate payers not the blow in neanderthal.

We live on a large rural property. Shooting impacts us through the disturbance to animals living with us from our dog who is terrified of gunshots, through to our horses, and scaring native animals causing panic. We run a rural accommodation retreat offering peace. This is shattered by gunshots.

It's extremely distressing hearing the gunshots. We live in an area where there are lot of ducks and to know they are getting slaughtered and/or injured and left is horrendous and bad for our mental health. We have families of ducks that come and go from out property, they trust us, I fear that if they go their lives will be taken. It's heartbreaking.

I am an avid bird watcher and photographer and I have witnessed duck shooting at Cairn Curran reservoir a few years back and all the birds, not to mention the ducks were so distressed from all the noise of the guns going off...they were flying aimlessly and criss crossing the reservoir without knowing where to go next....It was very sad and distressing to watch! I even sent a photo with an email to Daniel Andrews who (of course) never replied!!

I live on the Estuary Estate in Leopold. I hear the guns going off all the time during duck shooting season. It makes me feel sad, depressed & angry knowing that these poor innocent animals are being killed & mainly for recreational purposes. How can people be so cruel. If they want to shoot something they should stick to clay pigeon shooting!!!!

My family and myself used to live close enough. Every time it was duck shooting season we hated it because of the cruelty and it had a big impact on our 2 dogs who could hear the shooting more than us obviously... they we're constantly terrified of the noise affecting their behavior and I guess quality of life as well

I've lived rurally all my life, and have experienced and seen the negative effects of duck shooting for animals and humans. I hate this time of year, it's dangerous for all involved or nearby and so cruel. The emotional trauma affects both me and my husband badly.

We live in Regional Victoria for its beauty, the sense of community and peacefulness. We love the birds and animals around us. In the duck shooting season this is taken away from us. We are exposed to the carnage and see shooters with dead bodies of the creatures we love. Why put our communities and creatures through this each year

Duck shooting gives me extreme anxiety and depression.

The noise on the duck shooting morning sounds like world war three and goes on and on. You wonder what environmental damage has been done. We haven't been able to get a bike path put in through the Morass between Paynesville and Bairnsdale, even though Gippsland water approved it because the council said it was not environmental but duck shooting is allowed there every year and then for all that time the public are not allowed in the area. One wonders how duck shooting is environmental but riding bikes is not.

The sound of gun shots and seeing ducks flee to neighbouring areas is very distressing. The gun shots also cause much distress to dogs and other animals in the area.

I have had to end holidays as I could not stay in area where hunting was happening as it was too distressful knowing this was happening

The sound of gun fire is very stressful. We chose to live here because of the wildlife, including the abundant bird life. No one needs to use guns except professionals when other methods of putting an animal out of its misery cannot be used. No Victorian should be killing anything for fun/ sport. So wrong.

Have hit injured water birds on the road that can't fly out of the way due to damaged wings etc, always happens on the opening weekend of duck shooting, idiots shooting on private property dams. Have had birds that scoot across the ground from my dam making them easy pickings for cats and foxes.

I have thoroughbred agistment and rehabilitation at my property, and the shooting absolutely freaks the horses out, and they risk serious injury through galloping into fences in fright

After camping as a family we were extremely scared when people were suddenly shooting nearby and making horrible sounds. It was frightening to my children and very distressing. We found an injured duck the following day, which passed away with us in our car.

We live on the Murray River and the gun shots are frightening and stressful to our horses & alpacas. Also, we have several bird species living on our property and the slaughter and gun shots play havoc with their nesting, habitat and normal routines

Spoilt a holiday with shooters nearby taking over the area, loud and obnoxious, we had to leave and could not stand the sound of those poor animals being slaughtered

Duck shooting season always brings anxiety and distress to my family and others in my neighbourhood of Leopold, our suburb is part of the lake Connewarre and Reedy lakes system. Early in the morning the sound of shots wake my home it's a destructive sound of a terrible activity which you know is happening so close to well established suburb the sound is loud and you have an unnerving feeling of the suffering and death of ducks and other wildlife.

We need to seriously help and speak out about the numbers of dwindling ducks in this horrible shooting season also acknowledge how close to extinction some are becoming. How can shooters make a distinction of what they're shooting in times of diminished light, simply you can't.

Duck season is a blood sport and should be banned, many other states in Australia have already banned this archaic awful activity it really doesn't make sense to continue to allow the season to continue for the very few that partake.

I went camping and unfortunately didn't realise I was near a duck shooting area. Consequently, we went home.

I live on a farm - I see ducks on the dams all the time - they are safe there - i forbid people to shoot on our land - the sound of guns is disturbing for our dogs, cats and livestock

It negatively impacts my ability to enjoy walking along Lake Colac. The constants sound of gun fire reverberates across the lake and knowing that our beautiful waterbirds are losing their lives as a result of that gunshot is really distressing.

I live near Lake Connewarre. I hear volleys of gunfire in my house. I can't walk my dogs at the lake for 3 months of the year.

My family feel deep stress and avoid holidays near where these people shoot birds.

I frequently visit the 'heart morass' near Sale ... and find the diversity of 'life' in general in that area quite astounding .. this of course includes many water birds ... living in peace ...briefly . I feel that the grief and trauma that I share with these creatures as they are being killed/ maimed/ absolutely for no reason except " sport" ... affects my mental health terribly , as do many , many injustices that sentient birds and animals suffer from the wanton selfishness of some humans.

Every start to duck shooting I feel sick in the stomach. i absolutely have mental anxiety when duck shooting occurs. We live close to Lake Connewarre a region with a "Game Reserve" classification.

I live on the Murray river and have seen boats with men dressed in cammo brandishing weapons whilst our children are enjoying water sports. Have also had to deal with the awful sound of guns blaring. It's not regulated at all and hunters don't give a crap about other residents or tourists. I've also seen dead animals left floating.

Knowing it is happening up the road from us fills me with dread, and anxiety & helplessness as the birds are needlessly killed.

The sound of shooting makes me feel nervous and anxious. I live in a bush area and I don't want to use the bush (cycling/walking) when I hear shooting. There are many feral species where I live such as deer whose carcasses have been left far too close to homes, which of course brings feral dogs in closer too. Not sure everyone shooting out in the bush is actually hunting for their own food.

We can hear gunshots from our home and it is scary. We have to deal with the thought of what cruelty is being inflicted these poor birds.

I live within earshot of the gunfire. I find it distressing and upsetting. Killing native ducks for sport is repugnant to me. I live on the Gippsland Lakes and love the wildlife and beauty and serenity of living close to nature. Duck shooting makes me anxious, upset and fills my days with dread thinking of poor defenceless animals whose habitat has been invaded. My poor dog is scared of the gunfire and this is distressing too. My friends and family from Melbourne will not visit during duck shooting season as it is too upsetting and unsettling. We all hate it.

I have seen the dead & dying birds after they have been shot. I was grief stricken.

Each year I'm affected by duck/wildlife shooting, simply by knowing it's happening or by the gun shots I hear.

We live next to Loch Garry in Bunbartha Victoria. Every duck season we have shooters near or property. Disrupting our animals and even have shotgun pellets landing on our roof of our home. Shooters offer shoot outside the times allowed also. The shooters also leave huge amounts of rubbish in the nature reserve on top of the devastation they cause to the local flora and fauna. Game management authority have been contacted on numerous occasions during the duck season but nothing gets done about the shooters, even when evidence is provided about illegal activities.

seeing ducks still alive but in agony - shot but not dead being dragged from the waterways which has been their home - so distressing ...and in the name of sport. Our local lake area turned into a shooting range - our peaceful space ripped apart. Ducks are peaceful and help to improve our waterways - seeing them scared away by the noise or worse killed is confronting.

The emotional distress leads to sleepless nights and general anxiety and personal distress. Having recently discovered quail on a family property and realising how beautiful but vulnerable they are, not just to predators but now shooters, is too much to bear. These fragile little birds need to be protected.

The term "recreational hunting" is incomprehensible to those of us that love these birds both quail, ducks and all the other birds that are shot during duck season.

What right have we to slaughter these birds and destroy our bird populations.
It must stop.

I live near Lake Eildon and wildlife is a very important part of our region. Shooting birds and animals is not only awfully cruel and often leads to injured birds/animals left to die in agony, it detracts from human enjoyment of the lake. The sound of gunfire is very distressing and disturbs an otherwise peaceful environment. Shooting is not a sport and should never be considered one. Please help this senseless slaughter STOP!

Whilst on holiday during duck shooting season, we realised we were staying in an area that allowed the sport. We ended up coming home early as the sound of the animals being shot and killed for fun was horrendous, and quite distressing. While we were there we were stressed the whole time, waiting for the next day's shooting to start - or finish. Even then, we knew there were injured animals lying there dying. That's no way to spend a holiday.

Myself and some family members have been negatively affected emotionally by local duck and quail shooting. We can hear the firearms in the distance and it breaks our heart to think of these native birds being killed or harmed to lie suffering with horrendous injuries in the name of sport! It is cruel and unnecessary and it needs to be banned.

We live close to Lake Connewarre and since our 28 and 30 year old girls were pre-schoolers have been woken in the early morning of ducking shooting season by the constant sound of gun fire and, by association, the distressing realisation that huge numbers of ducks are going to be killed and maimed all for the pleasure of people who think that it's OK to kill animals for the fun of it. Very upsetting for children and adults.

I live nearby an area where duck shooting takes place. The shooters usually start before the allowed time and you constantly hear the guns going off.

I also remember a time that my parents found a heap of carcasses dumped in the bush that certainly proved the shooters were doing it for the sake of just killing something. Duck shooting just isn't necessary.

Having walks in regional Victoria and hearing shootings has been an extremely stressful experience for me and my family, as well as causing us to turn back and leave the area in fear of accidental shooting.

We live in a rural area and our main recreation is bird observing. For weeks each year, we dare not go to many of our favourite locations because of the cruelty and danger due to duck shooting. Please make it stop.

I teach VCE Environmental Science, Biodiversity is studied at year 12 . Strong scientific evidence predicts Avian collapse due to Climate Change. This is beside the impacts of habitat loss, predation & the senseless slaughter in legal killing . Knowledge of these facts impacts my students mental health. Not ok

We are keen field naturalists and birdwatchers, and members of local clubs. Over the decades we have witnessed the decline in habitat and decline in numbers of most birds including the ducks 'legally' . The decline in rarer species has been dramatic and of a huge concern to all members of our two clubs.

Suffer anxiety & stress that prevents me from going on nature walks because of fear that shooters may be in the area - as I have no clue as to where they may be and we have lots of wild beautiful ducks in our area

I have been out kayaking and engaging in other outdoor activities and had to put up with shooting. I do wildlife rescue and have had callouts to injured birds in backyards near wetlands and the birds have been x-rayed and found to have pellets, plus birds with obvious gunshot injuries. My family and friends are concerned because of the emotional impact rescuing shot birds has as it is preventable and cruel and therefore impacts me greatly.

Profound distress from the sounds of shooting.

We cannot visit friend in Gunbower during duck season due to pellets landing on his roof.

Unfortunately ended up camping in an area where there was duck shooting and it was so scary. I was scared for our lives, not knowing if we would end up in the line of bullet fire. I've also seen how aggressive duck shooters are and how intimidating they can be. It was also very noisy very early in the morning.

I have seen ducks still alive that have been shot but not killed brought into a Veterinary surgery where I was waiting for an appointment with my dog, the ducks wings half shot off 🙄

Our family was traumatised while visiting Victoria. Will never go down there again.

Constant feelings of anxiety at the needless suffering of wildlife.
Hearing the shooting in the distance when out walking...worrying about the children.

I operate a business from home. Occasionally my clients will need to visit my premises in order for them to access my services. During duck shooting season I advise clients not to visit for their safety and for fear of the traumatic sights they may witness.

Nearby duck shooting makes the wetlands and public recreation areas unsafe for my guests. In the 2022 season I had gun shots close to my house 7.30am Sunday, I closed my business until the end of the season and was stressed and worried about further shooting and trespass until the season ended. It is extremely distressing hearing the gun shots and knowing that our beautiful water birds are being killed.

We are personally affected as the sound of gunfire indicates that someone is wanting to shoot the very birds that we care so much about. It is a very real reminder of all the things that are so wrong with imbalance of society and environment that is causing such devastation on our planet.
We feel unsafe when going about our usual business in paddocks that are adjacent to the Richardson River where bird hunters like to stalk their prey.

Our usual recreational walks around local lakes and waterways are curtailed due to the fear of accidentally being in the firing line of gunfire.

I enjoy walking around Lake Connemara and I get very distressed when I see and hear shooting there and I cannot do my walk. I believe it is grossly unfair that the public is denied access, and I see evidence of suffering and wounded birds. The wetlands should be a sanctuary, not a killing field.

I own a property for conservation purposes under Trust for Nature Covenant and duck shooters enter it by foot or 4-wheel motorbikes for duck shooting despite private property signs. I am unable to patrol it and ought not to have to do it. I feel always very sad and distressed hearing the shooting and seeing birds fly away in distress. (I live on the Murray River floodplain.

I am a descendant of the Kurnai. These birds are our property rights. They are also our ancestor's identity. Shooting them you're shooting our people.

Stress, anxiety levels rise. Feel unsafe in kayak on waterways. Confronted with aftermath of duck shooters dumping heads, feathers in waterways. Have come across duck hunters illegally camping and often intoxicated.

The nearby gunshots cause distress to my animals.

We live adjacent to a wetland that is now a game reserve. Our livestock and pets are frightened by gunshots, we've had shotgun pellets land on our roof on more than one occasion. I've had 2 horses shot over the last 12 years, one fatally. The bush is a no-go zone for myself and the neighbourhood kids during duck season as it is unsafe.

One of the joys of country living is the accessibility of walks that allow the spirit to understand the union of the land, its fauna and flora to the wellbeing of us all. That a minority are able to destroy aspects of this life for a sport is unconscionable in this time of man's history.

I'm a keen camper and bird watcher, own a small van and wish to support rural communities while spending time in the natural world. I'm deeply distressed throughout the shooting season by the knowledge such brutality and suffering is inflicted on the birds I love. I feel this behaviour is reprehensible. Our environment and biodiversity needs respect and protection not this appalling behaviour dressed up as sport.

Illegal shooters on our property

My parent's farm is hilly with river frontage located in Acheron, Vic. It overlooks the river & river flats of the Goulburn River on the other side. Duck shooters every year enter the river flats & fire at the ducks taking aim upwards & towards their farm as the ducks try & fly off. Bullets have passed by me as I was riding my horse (at 8.30 or so) in the morning. They seem to shoot indiscriminately & for hours after dawn.

We live and work on a rural property where our farm animals, staff, volunteers and neighbours fear stray bullets and dead native wildlife every duck shooting season. We spend all our spare time and a significant portion of our business earnings improving our properties' native landscapes through Landcare, Melbourne Water etc revegetation partnerships to PROVIDE habitat for and PROTECT ducks, quails etc. What's the point in doing all this work when a small self-serving minority of Victorians turn around for a few months a year and shoot these birds for "sport"?!

Higher stress, anxiety. Gun shots close to home. Can't kayak during this time. Impacts all wildlife. Sight of duck heads and feathers dumped in waterways distressing. Intoxicated hunters illegally camping. Hate this time of year!!!

The destructive nature of this event for our environment is ludicrous. I have collected kilos of cans, bottles, gun cartridges and general rubbish from along Joyces Creek as well as the poor bodies of wounded birds. This must stop.

My family lives on Reedy Lake. I'm now 47 but for as long as I can remember, we've been woken by gun shots throughout the season and well before season opening time. Wounded birds have landed on our property. Shooters have left rubbish all over the wetlands.

We are land for wildlife with many native birds on the property, terrified by the deafening sounds of gun shots. Shooters have shot into our property.

It's horrific. Every single year.

Disturbance from the sound of nearby shooting when staying on our bush block. The presence of unauthorized shooters coming onto our property without permission. We modify our birdwatching activity to avoid wetlands during the hunting season so do not spend money at local businesses in regional areas at this time.

I feel distressed when I hear the guns going off in the distance, knowing that many native birds will be killed and injured. I am involved through my work and my volunteerism in habitat restoration for our local fauna (including birds) and I feel discouraged and disheartened that the government condones slaughter of our wildlife.

The noise is distressing. Every shot brings with it the pain & suffering these creatures are subjected to.

Personal health and safety risk and trauma associated, no one wants to visit, unsafe, have to deal with trespassers, breach of covenants and licences and little help from stat. Bodies

I am very stressed and upset by the gunfire and subsequent death of birds.

Living close to the Gippsland Lakes system the sound of constant gunfire in the mornings is so distressing and knowing that our precious native birds are being killed while others are left suffering from gunshot wounds causes me grief and heartache.

There is duck hunting at our local reservoir. Can't bear to even go there and see the carnage.

Shooting within earshot of our town causes extreme anxiety and stress in our dogs, and makes me anxious about stray shots hitting people

I cannot have guests stay in my bed and breakfast cottages, hold revegetation days, collect plants for my distillation business or have family and friends over.

Hearing guns out in the countryside makes me scared to visit an area, so we don't go. We turn back home. I like to visit waterways and walk but I'm terrified of accidentally getting shot (as has nearly happened).

Holidays in east Gippsland hearing gun shots. Very stressful knowing what this means for a bird. Knowing what is happening to the birds. Knowing what they are going through. A living hell for the birds and us.

Bellarine Peninsula wetland networks and waterbird habitat should be protected as per The Ramsar Convention. Species extinction and/or great reduction in numbers is of great concern to me. Taxpayer dollars should not be spent on 'blood sports' like duck hunting that provide no great benefit to the majority of the community. When was the last Brolga seen in the wetland areas. The shooting of native ducks is a blight on our community and the collateral damage to other wild birds unconscionable.

I went to visit a wetland nearby forgetting it was duck shooting season. Autumn mornings are often particularly beautiful so I drove to Lake Bolac only to hear gunshots whilst the sun was just cresting. My first vision of the day was watching birds fall out of the sky. Less and less are there places to go where nature is allowed to rest from human interference.

I was visiting a lake for a hike and there were shooters in the area. I am from Belfast and it was extremely triggering and frightening for me as I grew up during the troubles and it reminded me of the terrorism that happened.

Every year we dread the war like feeling the encroaches upon our activities of daily living. we cannot sleep, we cannot entertain, we hardly run our business. after covid, after flooding it's a slap in the face to have duck shooters near the house.

I have several friends living in the bush who constantly complain about shooters trespassing, damaging fences, leaving a mess and disturbing the quiet. They also are concerned about stray shots.

Constant volleys of gun shot.. noise unbearable at times. Witnessing terrified wildlife taking off. It distresses me enormously. My son witnesses shooters hiding in bush land when he is working.

I hate the noise, the disruption to other wildlife particularly birds, my dog is petrified and must be kept inside, the hoon driving of the shooters boats,.I believe the shooters are trespassing but feel totally intimidated by their presence six cars and a camper van within 300 meters of my house. If I was to report this would be obvious as mine is the only house within a couple of kilometres.

shooting in public places is barbaric and blocks non shooters from enjoyment.

its next to my house, i know these animals, i love them, i watch them, its distressing to know every morning and night right near me ducks are being hunted and i can do nothing to protect them

Reluctance to travel in those areas.

Those of us who respect the Victoria's natural environment are distressed and physically sickened by the stress resulting from the government endorsed killing of native birds.

Trespassing onto our property, shooting from the roadside, shooting from adjoining properties over our property, frightening horses causing injury. Duck shooting induces very high stress levels in our family due to the behaviour of many hunters who have no regard for the law, who do not humanely deal with injured animals and who have, on a number of occasions, become aggressive when challenged (while on our property!!). The suffering of the ducks, who we love and encourage onto our dams and property, is shocking.

Growing up on Reedy Lake, the rest of the year was safe for my brother and I to visit and enjoy the wetlands and observe our native wildlife. During duck hunting season, we could no longer visit the lake for fear of being shot, abused, witnessing the mistreatment of bird life.

Shooters have shot into our property, well away from the lake. They have left rubbish all over the wetlands including thousands of shotgun pellets, polluting the waterways. Dead, unwanted, often illegally shot birds are left. Shots often occur well before legal shooting time. Native wildlife on our property are frightened by shots. It's really awful.

Finding a black Swan with a pellet in its neck dead on our property and finding other native birds that had been shot, it is so distressing and depressing

We live close to several water ways which we visit regularly but NOT during duck season because it is far too dangerous. I am fearful of being shot.

I am currently moving my livestock away from our boundary paddocks in preparation for Wednesday. There will be no more kayaking or bush walking until it is over... except for careful trips to retrieve injured birds.

Feeling unsafe in wetlands, seeing litter around the areas and increased fox activity due to the dead native wildlife Gun shots heard very close during the day. Frightens the dog considerably and me.

Traumatised on a visit to Victoria to the point of our granddaughter having a panic attack. We had to put her in hospital for two days.

It ruins regional communities. Imagine how people living in the city would feel with constant gun shots ringing in the air for 2 months. They would NEVER allow it. Why do we think it's OK to impose this on country people.

Shooting over our property boundaries and frightening night time shooting close to our home. Scaring pet animals by close shooting. Wounding birds without collecting to humanely kill or seek vet assisted healing. Very distressing to see wounded birds on the water.

Over the years duck rescue has cost me a lot financially and has meant I've spent many weekends and other holidays committed to duck rescue rather than my own rest and recreation.

It is emotionally draining and upsetting dealing with such an injustice. It upsets our family and our small children. We and our local community put up signs to tell traffic to slow down for ducks

in our Woodend area. Knowing people are going out and shooting ducks and other endangered wildlife defies common sense, logic and humanity. It's deeply distressing.

We don't visit local wetlands during duck hunting. Those big burley blocks in camouflage are seriously threatening.

The tranquillity at my parents normally peaceful rural home is shattered every year, with the sounds of firearms, often injured and dying birds are located. This is followed by months of silent days where there is no bird noise, and no birds to be seen flying, swimming, walking around. Litter and illegal camping and loud socialising also occurs which interrupts their ability to get sleep, often with after dark shooting of other wildlife.

Stress, anxiety and shame that it persists in this state. Trust is an issue around why this good state government allows duck shooting to continue.

Personally, it has caused, and continues to cause, immense stress. I have to research when and where the duck shooting is every season (in case it changes) to ensure I don't travel to, or through, any of those regional areas. I donate regularly to support those who are going out in the fields to try and put injured animals out of their misery. I am ashamed to call Victoria my home, given so many other states have banned the sport years ago.

I don't know what they are hunting but I scream out "QUIT IT" when I hear gunshots near my property. My livestock (sheep and horses) are nervous too and as I have a km of Kangaroo Creek on my property there are many ducks. I don't feel safe to walk down to the creek to confront the hunters, who appear to be on the other side of the creek) in case I accidentally get shot.

We can't move around our farm without being afraid of being shot at by duck shooters.

when you hear a gunshot very close by you have a lot of different concerns - then add the knowledge an animal may be hurt and the arrogant stupidity of the fools with big guns it is very concerning - if they can't shoot a duck they then blast a road sign - DDDRRR???

The number of ducks on our property lessen which makes us sad as there aren't very many around anyway.

It diminishes the trust in the Victoria Government.

It has distressed us all. Because of the gunfire I don't want to be outside or down on the lake. This significantly impacts my way of life as I always watch the sunrise and sunset over the lake each day and love to be outside gardening when

I'm not working. I cannot bear to wake up to this awful sound knowing little defenceless birds are the target of the guns. I watch birds because I love them and they bring joy. I'm filled with complete sadness during duck season and in the months leading up to it.

The children are scared when they hear guns going off nearby. There is a danger of stray bullets.

I find it emotionally stressful to know that are shooting often without knowing what they are shooting. In my area livestock and pets have been killed and maimed by illegal shooters.

Unable to visit areas that i regularly walk in and engage in wildlife photography (birds) and landscape photography.

Friends can't go across road from their property to Lake without excessive drinking and threatening behaviour by loud groups of men. We find spent bullet cases in the park. Our scout group no longer goes to the lake as the atmosphere has become toxic and misogynist with male hunters there. I was warned off by Parks Vic from doing my TAFE project there as it is known as being unsafe due to hunting.

The rubbish and human waste toilet paper, left trees cut down for firewood, campfires still going, unable to visit our lake whilst these frightening men are around.

The dam on my property was always teeming with birdlife, but over the last 10 years the numbers have plummeted.

It upsets us and creates a disturbance in our beautiful tranquil part of the Otways.

We now avoid bushwalking or picnicking in any areas where duck shooting occurs. Personally, it's also distressing to know that waterbirds are being killed for fun during the mass extinction/biodiversity crisis.

We don't go near the wetlands when shooting is taking place...it taints the peaceful atmosphere and it is so upsetting to come across injured birds left to die ..it's disgusting

I HATE THE SOUND OF THE GUNS AND THE DESTRUCTION AND FEAR EVERY SHOT IS CAUSING.

As well as my cat being shot the early morning shooting wakes us up and we fear for the other birds in the area. I fail to see how anyone can mistake a pelican or a Swan for a duck.

Constant trespassing, with zero respect or regard for safety for the occupants of the property or the livestock in the paddocks

It means I curtail my normal activities, and don't visit regional areas.

We feel anxious and distressed in the lead up to the season each year. Then very upset at the sound of gunshot each early morning and random other times.

It has caused me significant distress for as long as I can remember (at least 50 years). Affects my family's and my quality of life for a quarter of each year which is as much as 12.5 years of my 50 remembered. Stuff that and stuff the shooters!
End it now



Sporting Shooters Association of Australia (Victoria)

Mr Graeme Ford
Chief Executive
Game Management Authority
via email: graeme.ford@gma.vic.gov.au

20 December 2023

Dear Graeme,

Duck season considerations – 2024 documents

As advised by email on 26 October, SSAA Victoria does not intend to make any submissions to GMA with regards to the 2024 duck season considerations other than re-iterating the Association's commitment to the Interim Harvest Model (IHM) and progression towards an Adaptive Harvest Model (AHM).

SSAA Victoria has been distinguished amongst stakeholders in urging GMA and the Government to follow the recommendations of the IHM since its inception in 2021. The IHM, coupled with the 'floors' set in the 'Conservation and Sustainable-Harvest Models for Game Duck Species' report, provides the government with the framework to safely set sustainable duck hunting seasons.

The Association values the establishment and entrenchment of an objective, data-driven process for setting season conditions over a process of arguing around the margins in any particular year. Consistent with that, SSAA Victoria supports a full-length duck season with regulated start and finish times and a return to a full-length quail season in line with the Wildlife (Game) Regulations.

SSAA Victoria would like to see a more proactive approach taken to stakeholder engagement, including a post-season review process to allow improvements to the administration of seasons to be adequately considered and implemented. The Association would also favour a normalisation of the season-setting process whereby the seasonal conditions for the subsequent year are published on government websites in December. The Association appreciates the impossibility of that occurring this year due to unprecedented political interference.

The Association also remains committed to supporting the full implementation of the Waterfowl Wounding Reduction Action Plan.

Yours sincerely,

Jack Wegman

CEO, SSAA Victoria



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About VDHA;

VDHA represents its members interests with Government departments and Government to ensure the continuation of hunting in the State of Victoria. Victoria has a long and established history of safe sustainable and responsible hunting of Duck, quail and deer species and has the largest quantity of licence holders for duck and quail hunting in the nation.

VDHA is a recognised stakeholder with government and provides expertise and knowledge from a stakeholders perspective.

GMA Board Brief 2024 Victorian Duck season

Prepared by Danny Ryan, Politics and PR officer VDHA

Executive Summary;

The following considerations are presented to the GMA board for discussion and provides alternative analysis of several key documents, Government provided data, abundance count information, Victorian select committee into Native Bird hunting evidence and other sources of information pertaining to duck and quail hunting in Victoria.

Sustainability; EAWS, ARI, NSW DPI

At the Victorian Select Committee into Native Bird Hunting, Friday 26th of May 2023 hearing Professor Richard Kingsford, in his introduction stated;

‘The fundamental issue here is that we have been losing waterbird habitat, wetland habitat, over decades as a result of increasing extractions and regulation of the rivers for the Murray– Darling, and we see that in the impacts on freshwater organisms that rely on those flows. At the same time, we also investigated whether there was any effect of hunting on those species, and we found a very small effect, which was considerably overridden by the loss of habitat effect.’

This YEARs Eastern Aerial Waterbird Survey (EAWS) (2023) executive summary and following 17 ‘results’ interpretations are confusing given such positive data, some of the commentary is extraordinary and highly unusual given there has been muted and restricted summaries in the previous 39 iterations of the EAWS.

The drought effected areas of NSW and Queensland is very small in terms of % and land mass, given large tracts of Queensland and NSW are predominately dry land. There are large wetlands and many ephemeral wetlands holding good levels of water from the 2022 floods OUTSIDE of the transects. The continental landmass of the Eastern Seaboard of Australia is considerable and wetland distribution varies greatly both along transects and outside transects, notably with some very large wetlands and wetland complexes outside the EAWS transects, transects which only survey **12-13%** of the landmass. Whilst some things can be determined by counting and checking in small sample areas counting waterbirds on small sample areas needs further methodology adapted to become a truer snapshot of game duck abundance at a given point in time.

Game ducks have increases by orders of magnitude with average highest counts between the ranges of 2nd-14th highest abundance over the last 40years of the EAWS. Its plain, with the exception of Mountain duck (which we know is an outlier in this years dataset), that all other species have increased their abundance and reversed decline. Populations rise, populations fall and they rise again, there are many positives in the EAWS but it’s downplayed to seemingly suit a narrative of climate change, long term decline and general doom and gloom, it’s almost like there’s a litany of reasons as to why the 7th highest abundance of waterbirds is a bad thing.....Long Term Averages do not lie, but it seems that’s not what the summary in the EAWS indicates... lots of decline listed however all of the

graphs and data indicate high abundance that have increased on last year and effectively addressed and reversed decline. The ONLY decline is the number of years waterbirds appear below the long term average; hence the term 'long term decline' is misleading; what's more accurate is the statement the 'EAWS 40 years records on abundance are more often below the long term average than above'.

Many duck species listed as no trend when in fact the abundance is in advance of last year; hence **increase**. This trend was also evident when game duck species are isolated and compared without the other waterbird species across the history of EAWS (Brown, P, (April 2023). On Analysing Trends in EAS Game Duck and Waterbird Count Data). Most game duck populations are well above the long term average and increased over last year. This is an INCREASE not decline. The first two years count still casts doubt as to its accuracies considering the long term averages and counts and by admission of its creator the difficulty in training people to participate in and conduct the survey, and its long term effect on data is of continued concern.

The three largest breeding events in the 40 years of EAWS are nearly all in the last decade, 2010, 2016, 2022. EAWS indicates a massive increase in abundance but then turns to say the breeding index is down and reduced. You cannot possibly have massive increase without breeding.

Kingsford himself stated at the Select Committee hearing that; *'The game species I do not think are monitored very well in terms of how much breeding, and that is one of I think the knowledge gaps. They are not easy to monitor, because they are very cryptic, and that is not when they want to be seen because of predators et cetera. They are not as easy as colonial waterbirds to monitor. But certainly in other jurisdictions around the world where duck populations are managed, one of the major indices is how much breeding occurs in a particular year. We certainly picked up some breeding of duck species, game species, in our aerial surveys, but when you are flying in a plane there is even less chance that you are actually going to see one of these birds breeding.'*

EAWS is subjective in regards to analysis, given some the same inconsistencies are prevalent throughout the 40 years of EAWS it needs to be considered alongside many other forms of data such as the Victorian ARI data, NSW Heli data. EAWS is a major contributor to the Interim Harvest Model which will be replaced from 2024 with an adaptive harvest model as per Victorian Labor Government lead SHAP2.

The **Victorian ARI** Heli data and analysis by Dave Ramsey, Ben Fanson, Arthur Rylah Institute, DEECA, Victoria, ***is produced specifically to survey game ducks*** was conducted from mid October to the first week in November. This robust survey uses a combination of aerial and ground counts, applies statistical and satellite imagery of available wetlands and is built for, and more importantly, fit for purpose.

The 2023 result of median result of design based estimates of **7,120,600** is a **195.46%** increase over the 2022 result of design based estimate of **2,410,000**

The NSW DPI Heli data count is similar to the Victorian ARI count in both methodology, data collection and application of similar modelling. Its important to recognise it counts a smaller

area and focuses on the Murray Darling Basin within a small part (geographically) of NSW. It has been subject to budgetary constraints and has counted some wetlands consistently but not others, omission of channels in 2022 but included in 2023 is a major change, it demonstrates if you count more wetlands and waterbodies you find more game ducks. The NSW data for 2023 produced a count of 4,294,832 game ducks across 9 species an increase of **345%** over 2022, however it did not count ephemeral wetlands in the MDB. Importantly the NSW DPI allocate 10% of the Total abundance quota, across **ALL SPECIES**(Table 2 page 16) and is then followed by subsequent detail on page 17 which states;

'Management quotas are established for species where there is less risk from exploitation. These ducks have relatively large populations, are widely distributed, and some monitoring data suggest that their populations respond predictably to environmental changes. For species with a higher risk of overharvesting due to smaller populations and/or uncertain dynamics, reactive quotas are recommended.'

This mirrors many findings of the ARI, Expert panels advising the GMA and hunting bodies in general agree in terms of waterfowl sustainability. Professor Prowse's report from *'Conservation and Sustainable-Harvest Models for Game Duck Species Thomas Prowse July 2023'* suggests much higher sustainable offtake percentages than NSW's 10%.

The NSW count was conducted earlier in the year (May-Jun 2023) than both the EAWS and ARI Vic data. This means it was conducted PRIOR to the peak initial breed of spring. Given the speed and propensity that Australian game ducks breed in conditions still available the NSW Heli data numbers could be as little as 30-40% of what is there now. This is similar to the current Victorian conditions where with the latest rain events in November and December 2023 we will witness an additional factor of abundance increase as game ducks continue to breed.

At the select committee hearing Professor Klaassen stated
'Just generally, for ducks, they are very resilient. They reproduce at a very young age, possibly even within a year, notably here in Australia, and when the conditions are right they just keep on breeding – many species of ducks. They also have large broods. When opportunities arise for reproduction they reproduce, and there is also no so-called density dependence observable in ducks, not only in Australia but just generally. So it is not that they hit a limit; it is really that when there is a good environment for them they breed, and they breed and they can bounce back quickly.'

Given the MDB is in close proximity to northern Victorian wetland systems as ephemeral wetlands change (increase or decrease) the nomadic nature of Australian game ducks could mean shifts of multiple MILLIONS of birds into or out of each area.

VDHA considers; Sustainability and linking offtake quotas to known scientific abundance is preferential to alternate and often flawed previous considerations as applied to setting harvest limits. Some data such as EAWS is not fit for purpose and only useful for small component pieces of a larger and wider data gathering process for the AHM. There is expert evidence that sustainability is unaffected by the small quantity of game ducks and quail harvested in an annual season. The present abundance levels when linked with variations of % offtake from 10-30% will not unduly influence sustainability.

Climatic; BOM forecast;

Kingsford References in his explanations in EAWS;

#1; global warming references are odd and out of place; as increases to abundances demonstrate

#2; Dry October and references to BOM, instead all of the Eastern Seaboard had above average rain in November and now in December cyclone activity has produced serious flooding in FNQ and widespread rain event in Victoria and NSW that will trigger further breeding into Jan/Feb 24.

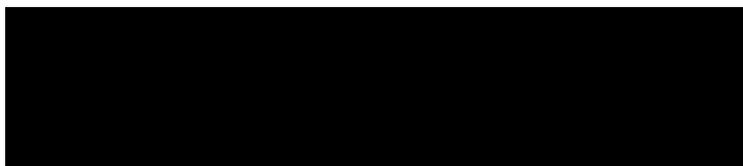
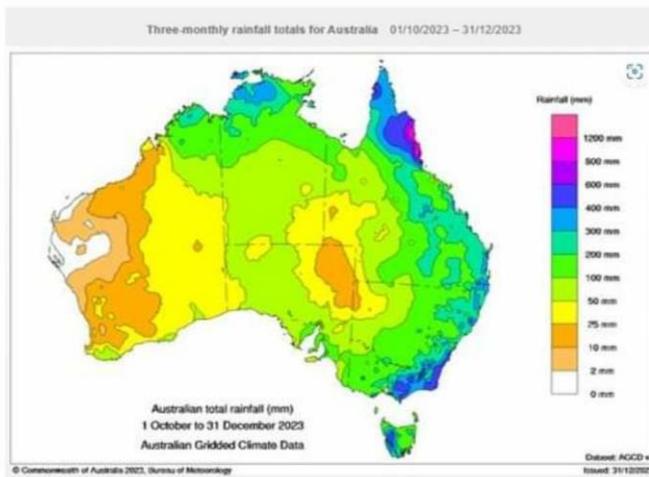
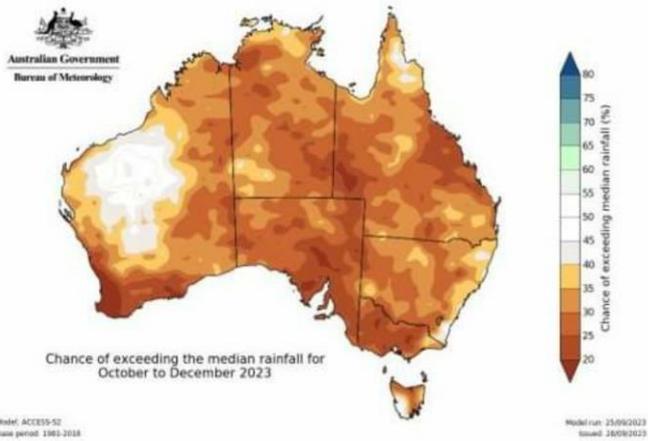
#3; Low stream flows generated from low rainfall in October, as it's now rained in November and December which will in turn increase stream and environmental flow/emergency releases of water. The majority of water storages are at very high capacities as noted.

#4; Water storage references go against previous Kingsford statements that deep water storages do not influence abundance as it's not preferred habitat for waterbirds

BOM data, as per previous years has been highly susceptible to change, any forecast is subject to error, the predicted El Nino seems to be incorrect and La Nina conditions continue, with large water bodies contributing to continue atmospheric moisture content it would be just as likely to have continued rainfall than less.

The ARI preliminary data indicates (page 2, chapter 1.3.1 Water Surface Area); *'Overall, surface water availability in 2023 has declined slightly since 2022 for both wetlands and dams but was still higher than in either 2020 or 2021 (Figure 1).'*

In the last two months Nov/Dec23 we have seen multiple rain events that have topped up wetlands and produced up to moderate flood levels down rivers that in turn feeds wetlands along those systems. It is expected this will produce another breeding boom for Jan/Feb24.



BOM forecast (top) V

Actual (bottom)

VDHA considers; BOM data is highly susceptible to change, game ducks are highly nomadic, Victorias (and the eastern seaboard) current wetland index is high and should not influence any season length or bag limit

IHM- Season Length

The Interim Harvest Model has produced a 9 bird bag, indicates a full length season, and as its expert authors continually state its desirable to moderate bag limits to control harvest not the season length.

Year on year analysis of the EAWS and season declarations and Victorian season settings for previous years would produce a FULL bag limit as regulated in years such as this where abundance and wetland prevalence exists.

This years data is in advance of 2017 and very close to 2011 season conditions, both years with high abundance and higher than long term average harvest levels. It has been a long term concern that even in the best conditions the IHM would not return a full bag full season and this has been borne out by this years result.

VDHA considers; Given the current abundance conditions the recommendation from the IHM should be for full legislated season length and full 10 bird bag limit with all species included with a species limit of 2 Blue Wing.

Expert data; Prowse

Conservation and Sustainable-Harvest Models for Game Duck Species Thomas Prowse July 2023

This comprehensive assessment of multiple science methods and data provided from various government departments and expert sources makes for very interesting reading and analysis. His report focuses on 4 primary species, Black Duck, Grey Teal, Chestnut Teal and Wood duck; From Professor Prowse's report he states;

'The overall goal of this report is to inform sustainable proportional harvest quotas that will not compromise the viability of game duck populations in Victoria or eastern Australia more generally, This report builds on prior work to develop the WCHM, by developing metapopulation models for four game ducks: two highly mobile species (Grey Teal and Pacific Black Duck) and two more sedentary species (Chestnut Teal and Australian Wood Duck) (Ramsey et al. 2010). The models are then used to consider sustainable rates of harvest offtake that could be used to inform a framework for setting the annual recreational harvest regulations. For the purposes of this report, sustainable harvest management is defined as management with the following objective: To maximise the cumulative harvest over a 50-year period, under the constraint that populations are maintained above some minimum population threshold (i.e., some fraction of carrying capacity).'

His assessment uses available parameters, including what VDHA would suggest is very high crippling loss figures, is that;

'Simulation results for Grey Teal and Wood Duck suggested that long-term mean population size and expected minimum population size (for Victoria and the entire simulated metapopulation) could be maintained above 20 % of carrying capacity for up to (and including) 30 % proportional harvests. Results for Black Duck and Chestnut Teal suggest a more precautionary approach, however, with 30 % harvesting dropping the expected minimum population size in Victoria below 20 % of

carrying capacity for these species. Given these results, a precautionary proportional harvest quota of 10 to 20 % is recommended for these species.'

Prowse 4.1 Sustainable Harvest Rates

What is determined here is that up to 30% of population of Wood Duck and Grey Teal can be harvested without long term effect on the base populations and 20% of Chestnut Teal and Black Duck. Including other species in a similar manner would suggest all species can maintain harvest percentages up to 20% whether a sedentary or highly mobile.

Lets focus on the Wood Duck (Victorias most populous species) for a moment and considers the boom that the Wood duck species has experienced for the last 50 years since modern Australian condition has provided perfect conditions for.

Richard Kingsford; The other element in here is wood ducks – and I published on this – have certainly been the least affected of perhaps all of the duck species because they have taken over farm dams and golf courses and they breed in all sorts of places that they probably did not breed in in the past. We still believe that in the big systems they have been impacted by the loss of habitat with river regulation, but they are one of the species that are certainly a lot less affected than others.

In Victoria the population explosion of the Wood Duck has created a 2023 population estimate of 2,567,300 over the 2022 Victorian ARI estimate 1,140,100 a 125% increase. This species is the highest abundance recorded of all species. Prevalent on private farm dams, wetlands, lakes, rivers creeks and stream, channels and of course ornamental lakes and golf courses these ducks have become a pest in many places. Agricultural crops are decimated and dams for watering stock turned into bacterial soup from duck droppings by Wood ducks. Given a 10% (ultra conservative) offtake produces 256730 and that 30% (upper sustainable) is 770190 the middle (conservative) 20% offtake of wood duck would be 513460.

Wood duck is commonly the third highest species in harvest alongside Grey Teal and Black Duck, in several of the harvest reports since 2009 it was the highest indicating its consistent high numbers and ongoing resistance to hunting pressure. 2009/10 had 3 additional wood duck per day in the bag limit and was the highest number of birds harvested by species in 2009, 2010, 2014 and is consistently in the top3 harvested species year on year. Its numbers continue to climb and several years of low harvest due to covid and restricted seasonal length have allowed this species to increase to levels not previously recorded.

Prowse's Executive Summary states;

'Based on the metapopulation simulation results, along with considerable uncertainty regarding species' demography and dispersal, crippling loss rates and the impact of climate change, a precautionary proportional harvest quota of 10 to 20 % is recommended for these species.'

VDHA notes that this harvest percentage scale still includes a high 23% crippling figure, adjustment on newer science may increase the proportional harvest % in the future.

The largest harvest in recent records is 600,000 in 2011, and in that year 132,000 wood duck were harvested, or 5% of an ultra-conservative off take on 2023 abundance levels. Wood duck could subsequently be added up to 10 birds a day extra over the seasonal bag limit without affecting base populations and still not affecting the booming Wood duck population.

For all species an ultraconservative offtake of 10% for 2024 produces a harvest of 712,000.

To produce a harvest at this level of approximately 25000 duck hunters would indicate a bag limit of 12-13 birds per day would be required to achieve that. If a **less conservative** 15% harvest was used then a harvest 1,068,000 require a 15-16 birds per day limit. If 20% **conservative** harvest is used then 1,424,000 birds would still be a sustainable harvest. This would be 24 birds per day.

VDHA considers; A sustainable harvest level based on government abundance and expert harvest percentage advice from 10-30% when applied to population abundance and historic harvest levels should be considered when making recommendations to setting bag limits. When levels of abundance are heightened far above averages, that should determine a significant increase in the bag limit. Given the heightened abundance of Wood Duck these should be subject to an additional bag limit as demonstrated by this years data up to TEN in addition to either an ultra conservative 10%, conservative 20% or upper sustainable 30% seasonal bag limit with other species.

Opening day considerations and exceptions

Given the large quantity of game ducks in Victoria and consideration of % offtake to achieve a harvest that ensures sustainability whilst providing for the hunting community an increase to opening day bag limits is within the scope of the Season Setting Considerations based around total harvest. The highest harvest on recent records is 2011 with 600000 birds harvested. As per above modelling based on Professor Prowse's expert report certain species can sustain higher offtake than others. To achieve a 10% offtake for the full-length season would require the total bag limit to be lifted to approximately 12-13 birds per day, instead of additional bag limit over the current regulated season it is within the scope to allow for an increased bag limit for the opening TWO days of the season to 15 birds per day whilst retaining the regulated bag limit for the duration of the rest of the season.

Hard working Victorian families look forward to Duck Opening as a major part of the social and family network activities of the year. A Wednesday opening is adverse to successful outcomes as many hard working Victorians cannot access days off in the middle of the week. Whilst this adversely reduces the amount of hunters that can attend it also has other indirect and consequential outcomes, notably management and control of hunting activity, economic considerations and animal welfare implications. Less hunters on Opening day is not the answer to perceived regulatory problems. Anti hunters will claim the cost of managing a weekend opening is an unfair and undue burden on Victorian taxpayers however VDHA considers that those employed as public servants can be managed under usual employment arrangements. Amongst alternatives to the traditional Saturday opening day VDHA would recommend a FRIDAY opening as an alternative to a Wednesday opening date.

VDHA considers; An increase to the opening two days seasonal bag limit to 15 birds per person will provide a sustainable outcome that allows harvest level given a super high prevalence of game ducks demonstrated by numerous data sets and sources. Other than a traditional Saturday opening, a Friday opening day is preferential. Additional wood duck for every other day of the season after the Opening two days of the season.

Human safety

Human safety and the right to hunt has been established internationally for decades. Hunting and the environment in which it occurs is highly specialised and often dangerous. Allowing any form of harassment or protest by radical anti hunting protesters around hunters with firearms is highly inflammatory and dangerous. Hunters are also highly disadvantaged in conflict scenarios often presented by radical anti hunting protesters as they are highly regulated and law bound to comply with multiple conditions laid down by those laws. The Government does not allow law enforcement or other professions into these situations without a great deal of training and OHS governance. The Human safety regulations as applied to hunting need a dramatic overhaul for the Game regulations 2024-2034 re write.

VDHA considers; we recognise the existence of the radical animal activism cohort in the state who protest all things involving animals; hunting, racing, animal ownership, breeding, fishing, farming and a myriad of other animal 'causes'. Animal activism is big business and sits in a busy activism space with multiple agencies that creates an ever increasing competition to be more 'activist' than your competitor. We have seen the rise of what was once relatively calm protest behaviour become aggressive, combative and plainly dangerous in this state, as recognised by the recent protections introduced for farming and bio security. Hunting deserves the same protections.

Hunter behaviour and enhancement to compliance;

VDHA recommends a heightened and high tempo response from GMA and partner authorities PRIOR to the season and in particular pro-active compliance activities on Duck Opening Eve.

The GMA should be given advanced lead times to plan and ensure broad access to the hunting community, publication of regulations and information materials in other languages, specific effort should be made weeks in advance in communities through interaction at regular gatherings and through prominent identities in those communities.

Increased penalties and materials produced, such as signage, to advise and alert hunters entering SGR's in particular and noted popular hunting areas/towns/cities along with a social media and EMAIL/SMS communication blitz. GMA should also attend as many hunting organisation-based information sessions as a high priority.

VDHA considers; GMA and partner agencies should plan and produce materials specific to assist with compliance activities and engage with hunting stakeholders to work on areas open to enhancement.

Regulations and start times;

The WRAP specifically identifies several key areas that hunters should employ in an effort to take game within their capabilities. Several regulation changes over the last few years have actively worked against some of those key areas; late start times in particular are of high concern. Immediate retrieval should be replaced by immediate dispatch and revised emphasis on retrieval thereafter. A full revision of introduced regulations should take place as soon as practicable and assessment of past performances of recently introduced regulations undertaken. Those recently introduced regulations that have had minimal impact on positive outcomes should be disbanded and efforts on key regulatory compliance emphasised.

In order to allow hunters to immediately dispatch game effectively and safely radical anti hunting protestors should not be allowed to infringe and harass hunters, including creating wetland disturbance with whistles or flags.

VDHA considers; The start time for the first three days of the season should be closer to sunrise with a 0730h start statewide and finish time for the first three days at sunset 1930h. Subsequent days revert to 30mins before and after sunrise/sunset. Increased compliance effort by partner authorities in regards to dealing with anti hunter behaviour whilst GMA compliance effort centre around hunter activity.

Select committee

VDHA recognises the Select Committee report delivered in August 2023, we respectfully point out that of the committee of 9 participants; 4 formed a majority view whilst 5 members raised minority or dissenting reports.

Sustainability; was a large topic and well covered by several Australian and International experts; outcome; hunting has little to no effect on abundance and instead habitat is the key driver.

Economics; was a contested topic with the government selected agency RMCG delivering expert and ratified data. Hunters spend money when they hunt. Restrictions and over regulation of season length, bag limit, mid week start times, over regulation and no policing of anti hunters leads hunters to become more selective and either a) hunt less or move their hunting activity to other areas, b) not hunt at all, c) fail to renew licences, d) hunt interstate or overseas. We do know that if hunters don't hunt they don't spend any money or contribute to the economy (especially rural).

Amenity; one of the finding from the select committee was there is few if any resources to determine where hunting can take place. Under SHAP2 this falls to the responsibility of DEECA who has developed several versions of an app that shows in real time areas open to hunting, type of hunting. A large amount of duck hunting in particular takes place on Sate Game Reserves, these SGRs were bought and paid for by hunters to ensure the continuation and protection of the environment for game duck and quail. These SGRs are used for hunting for 3 months of the year and are an available resource for all Victorians the other 9 months of the year.

Indigenous culture and heritage

Hunters do not intentionally damage Aboriginal culturally sensitive sites. Some of the information presented to the Select Committee was blatantly false. SHAP2 has several key

elements around indigenous culture. Modern hunters have a great affinity with indigenous hunting and support educational materials to become even more aware.

Social wellbeing impact; hard working Victorian families cherish their outdoor time. It allows participants to unplug and reconnect to nature, engage with family and friends. Numerous studies indicate that hunters and their families lead happier and more contented lives. In times of increasing costs of living and stress hunting provides an escape and also is a source of free range food to supplement families food sources, particularly relevant in a cost of living crisis.

Wounding and animal welfare concerns; The Wounding Reduction Action Plan as an integral part of SHAP2 addresses many aspects of wounding. Hunters are acutely aware of this issue and utilise specialist and expensive resources to attract and entice game into ethical harvesting distances. Equipment and planning also make up an essential part of the hunters inventory to assist in ethical harvesting with minimal impact on animal welfare.

The last studies into wounding rates were conducted by Norman in the mid to late 1970's when the state had 100,000 duck hunters, seasons started in late February and the opening bag limit was 20 birds with 10 every other day. Five shot semi automatic shotguns were prevalent and hunting was undertaken by a wide socio economic user range and clay target ranges were not as widespread nor was membership of hunting or target shooting organisations as common as it is today.

Normans studies indicated embedded shot from 6-19% of birds studied, with some years results higher or lower than others.

(Norman FI (1976) The incidence of lead shotgun pellets in waterfowl (Anatidae and Rallidae) examined in south-eastern Australia between 1957 and 1973. *Australian Wildlife Research* 3:61-71.)

GMA has over the last two years conducted a wounding rate study with the following results;

2022, 596 birds scanned, 3.4% of birds scanned retained pellets

2023, 635 birds scanned, 2.4% of birds scanned retained pellets

Using the above Government produced data results as an index it's irrefutable that there has been a massive reduction in wounding over the last 50 years. It is notable that these captured birds that retained pellets were living healthy lives prior to capture and release. Not all wounded birds die or suffer.

Some Anti hunting groups claim up to 66% of birds are wounded (down from 75% from a few short years ago), but yet recover so few wounded birds (less than 20 last year) in spite of thousands of man hours searching for them, that the quantity compared to the harvest total is so low its almost incalculable. The RSPCA claim 105,000 birds wounded for the 2022 duck season. Given the tiny number of wounded birds recovered during the course of a duck season such claims show the contempt of the RSPCA show to any statistical and factual data in an effort to increasingly engage in animal activism.

Australian hunters are competent and we hunt in different manners and hunt different birds to our European and American cousins and it's clear wounding whilst an important issue that requires constant improvement is no where near as high as either the regulator or especially the anti hunting movement claims. Even the Victorian RSCPA cannot quite decide

itself what the wounding rate is, one moment claiming the wounding rate is 66%, the in 2022 submission to GMA it claims;

‘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.’

and the next stating on it’s own website that;

‘Until evidence to the contrary is provided, it appears that based on Australian studies, approximately 26% of birds shot will be wounded or maimed/crippled [3]. Of these, approximately 12% will be wounded and survive, and approximately 14% will be maimed/crippled but this could be as high as 33%’

[3] Norman FI & Powell DGM (1981) 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 8:659-664.

Even this last statement from the RSPCA is data from 1981; **42 years ago**. In its submission to the Select Committee it states 6-40% as taken from the GMA WRAP meetings (note that the GMA has NOT supplied an official figure as it’s unknown)

The **CURRENT** GMA data suggests significant reduction as above. Hunting organisations and the hunting community support reduction in wounding initiatives and will continue to refine efforts to do so. What is plain and clear from analysis of the current data is that there’s been a **reduction of wounding anywhere from 150-691%** (6% to 2.4% or 19% to 2.4%) in the last 40 years.

VDHA considers; Much rhetoric about wounding rates is emotive and highly erroneous but is driven by many anti hunting groups under their agenda, inflated and over quoted numbers designed to instigate and their narrative and false information whilst they fail to produce real world evidence or any quantity of wounded birds to support their claims. Hunters have improved methods and skills and will further drive down the wounding rate numbers with assistance and consideration from positive regulation and education.

Further training/hunting continuation

Hunting Stakeholders along with the regulator and Government have a responsible part to play in the continuation of ‘safe, sustainable and responsible’ hunting.

The select committee provided many variations of further training as did/does participants of the select committee in Minority reports, SHAP2 and the WRAP. Some, but not all of the recommendations or suggestions are viable for a great many reasons. Some organisations also have widely differing views and positions in regard to training, its application and method of delivery.

Some immediate and fast to implement tools and education materials are available to regulators and Government. In the first instance VDHA supports education and training over regulation.

The use of webpages for Game licence renewals presents opportunity to introduce a quiz on regulations for hunters (replacing the long cherished and well received annual Hunting handbook that was discontinued due to budget constraints) in a phased renewal process.

Similarly a WIT (Waterfowl Identification Test) refresher separate from the actual WIT test could be employed (as NSW DPI uses it) in a phased renewal process.

Compulsory membership of a hunting organisation has also been suggested as a possible provider of training and education continuation, this would require resourcing and alternative languages or interpreter services that hunting organisations do not have immediate access to but could integrate.

Compulsory certified attendance at a shooting range annually to maintain competency is also an achievable goal in the medium term, this would of course require additional resourcing as nearly every shooting range is manned by volunteers and the State does not possess any of its own shooting ranges.

VDHA considers; every hunting organisation as a major stakeholder should take part in a joint conference and workgroups to map and plan these management tools. Hunting has extraordinarily HIGH COMPLIANCE (99%+) and onerous and over complicated additional regulation will cause hunters to exit. Existing hunters over the age of 65 be exempt from any new regulations. Hunters must also be assured that complying and new initiatives will result in enhanced hunting opportunity, continuation and support of hunting in Victoria.

Closures;

Last year, 2023, saw some exceptionally odd closures with little to no ratified science nor consultation with hunting organisations. Where justified, and with sound scientific reasoning, VDHA would be supportive of warranted closures for short terms with enhanced monitoring of any closed locations. To counterbalance this any closure consideration should be brought to a committee discussion of stakeholders so that there is transparency in the process. Hunters have rightly developed a critical view of this process as decisions are made that adversely affect us as stakeholders.

VDHA considers; no closures should occur without sound scientific process and consultation with hunting stakeholders.

Quail; full length as regulated season.

VDHA considers; at preliminary stages, indication of previous 2023 Quail abundance and distribution present no evidence for any restriction or change to the current regulated season length or bag limits.

WLDLIFE
VCTORIA

Victorian Duck Hunting

CONSIDERATIONS FOR A
2024 SEASON



About Wildlife Victoria

Wildlife Victoria is a non-profit organisation that has operated the state's 24/7 wildlife Emergency Response Service for over 35 years. This service is provided to the Victorian community free of charge and is made possible by a small team of staff and an expansive network of dedicated volunteers. The organisation consists of a head office, a 24/7 Emergency Response Service, a Travelling Veterinary Service with in-field wildlife veterinarians and veterinary nurses, and a statewide network of over 1,400 trained wildlife rescue volunteers deployed as part of our Emergency Response Service to attend to wildlife in need.

In 2023, Wildlife Victoria responded to over 120,000 calls for help from the Victorian public for sick, injured and orphaned wildlife and assisted 86,658 animals across 452 species.

Wildlife Victoria received on average seven calls per day in 2023 from a member of the Victorian public seeking help for a native duck.

In addition to our wildlife operational response, through our education and advocacy programs Wildlife Victoria helps wildlife by providing people with the knowledge and skills they need for peaceful and positive co-existence with wildlife and facilitating positive community attitudes toward native animals.

During opening week of the annual duck shooting season, Wildlife Victoria deploys an experienced team to operate an in-field Veterinary Triage Unit. Wildlife Victoria's veterinarians and vet nurses diligently evaluate and address injuries in waterbirds, as well as conduct assessments on deceased waterbirds left on the wetlands. All veterinary findings are compiled and documented for evidentiary purposes. This role affords Wildlife Victoria a distinctive vantage point concerning recreational native bird hunting practices, facilitating the provision of objective data to the Game Management Authority (GMA) and the Victorian government. This service is provided at no cost to the Victorian government or the Victorian taxpayer.

Wildlife Victoria position on duck hunting

Wildlife Victoria is opposed to duck shooting in any form and calls for its immediate and permanent end.

Executive summary

Wildlife Victoria provides considerations to the Game Management Authority (GMA) in response to the Considerations for the 2024 Duck Season document dated 19 December 2023.

This document provides data and input into nine key areas for consideration:

1. Parliamentary Inquiry into Recreational Native Bird Hunting
2. Wildlife Victoria resource management
3. Long-term decline of waterbird populations
4. Legislative considerations
5. Compliance and enforcement capability
6. Community sentiment
7. Economic benefits
8. Ecological concerns - risk to threatened and non-game species
9. Animal welfare

Recommendations are also provided.

Considerations

1. Parliamentary Inquiry into Recreational Native Bird Hunting 2023

Wildlife Victoria prefaces its submission with reference to the Parliamentary Inquiry into Victoria's recreational native bird hunting arrangements conducted in 2023 and the final report tabled in Parliament on 31 August 2023 (Select Committee on Victoria's Recreational Native Bird Hunting Arrangements, 2023).

The Select Committee conducting the Inquiry represented a cross functional group of members of the Legislative Council from government, opposition and other parties and assessed an extensive amount of research and evidence. The Inquiry received over 10,000 submissions – the highest ever received by a Victorian parliamentary committee.

The final recommendation from the Select Committee for this Parliamentary Inquiry was for **recreational native bird hunting to end on all Victorian public and private land from 2024.**

While Wildlife Victoria appreciates that the GMA is following normal processes in consulting on its Considerations for the 2024 Duck Season, Wildlife Victoria continues to make the same points in its opposition to a season going ahead in the ensuing pages – all of which were considered by the Parliamentary Inquiry.

Wildlife Victoria expects the Victorian government to respect the outcomes from the Parliamentary Inquiry and implement the findings made by the Select Committee.

Wildlife Victoria does not expect a 2024 season to go ahead.

2. Wildlife Victoria resource management

Wildlife Victoria contends that the services it provides during the duck shooting season are integral to the Game Management Authority, the Victorian government and the wider Victorian community. The cost of Wildlife Victoria’s Veterinary Triage Facility, as well as the opportunity cost of diversion of veterinary services away from existing rescue caseload and patient management, and the wages of other operational staff in attendance, must be factored into the overall cost to taxpayers in the ongoing operation of an annual duck shooting season.

Responding in field to shot and injured native waterbirds during duck shooting season, as well as the substantive resource demand on Wildlife Victoria to persistently advocate and provide data to highlight the suffering of Victoria’s native waterbirds, is an unreasonable impost on a charity.

The demand for Wildlife Victoria’s 24/7 wildlife Emergency Response Service continues to grow each year. Between 2021 (91,399) and 2023 (124,091) Wildlife Victoria experienced a 36% increase in call rates from members of the Victorian community seeking assistance for sick, injured or orphaned native wildlife. The ongoing increase in call volumes to Wildlife Victoria’s Emergency Response Service equates to ongoing operational cost for a Charity that is operating the State’s 24/7 wildlife emergency response service almost wholly on donations and with government funding equal to less than 10% of total operating costs.

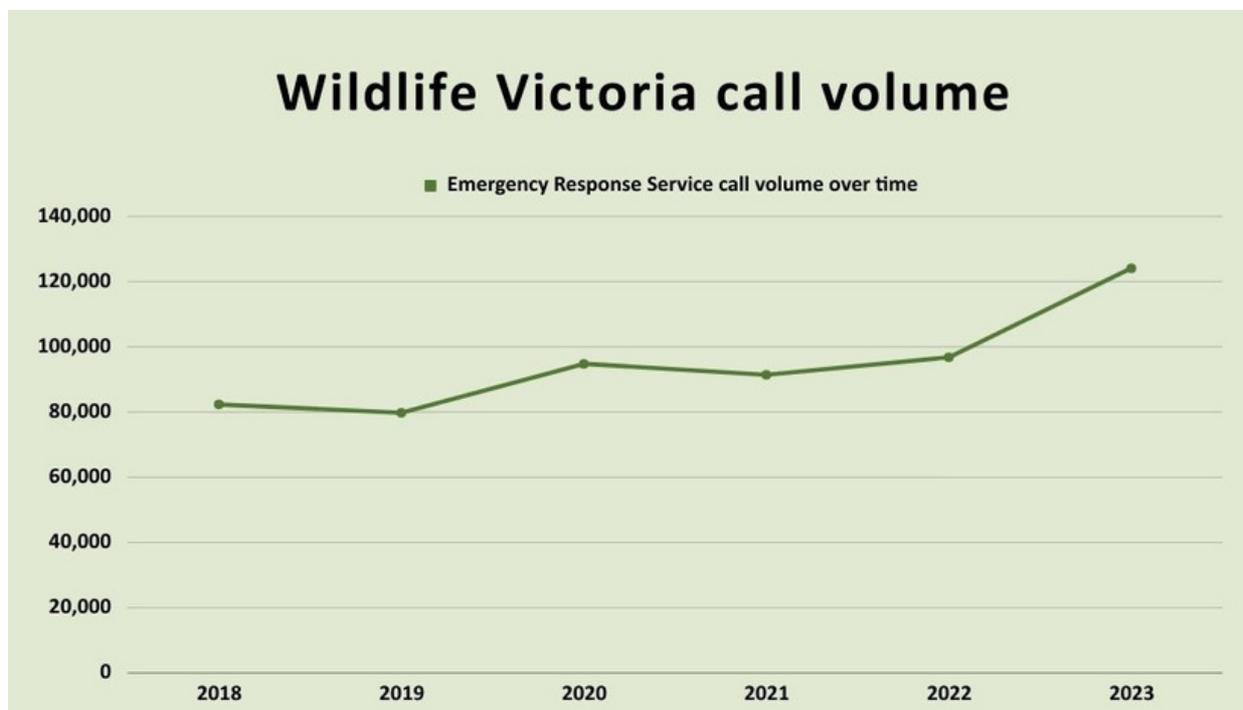


Figure 1. Calls to Wildlife Victoria’s Emergency Response Service are growing year-on-year

The annual Victorian duck shooting season places increased financial and operational pressure on Wildlife Victoria outside its ordinary operations.

At the start of each duck hunting season Wildlife Victoria operates a Veterinary Triage Unit on site to:

- Assess and treat injured wildlife
- Accurately identify species
- X-ray injured and deceased wildlife
- Record accurate veterinary case notes for each animal
- Provide information and evidence to GMA authorised officers

During the opening week of the 2023 duck shooting season, Wildlife Victoria deployed to wetlands west of Charlton, Victoria. Over the week, Wildlife Victoria provided the GMA with detailed veterinary reports for 73 individual waterbirds left injured or deceased in field, provisioned GMA with daily summaries of species assessed by type each evening, engaged in regular communication with GMA authorised officers, and consulted with them on urgent welfare issues. A detailed final report summarising the week’s findings was supplied to the GMA the week following Wildlife Victoria’s in field deployment.

Wildlife Victoria’s in field evidence is invaluable in supporting the GMA in its regulatory role monitoring shooter compliance. Wildlife Victoria provides this service to the GMA at no cost.



Image 1. X-ray evidence provided to the GMA from the 2023 duck shooting season

Wildlife Victoria's 2023 veterinary evidence was also provided to the Select Committee of the Parliamentary Inquiry into Recreational Native Bird Hunting.

Wildlife Victoria asserts that the cost of Wildlife Victoria's in field service, as well as the cost of diversion of veterinary services away from existing rescue caseload and patient management, be considered in the overall cost to taxpayers of operating a duck shooting season.

3. Long-term decline of waterbird populations

Wildlife Victoria calls to attention the accumulative evidence of long-term declines in waterbird populations and asserts the continuation of an annual duck shooting season exacerbates the downward trend in population numbers.

Since 1983 the Eastern Australian Waterbird Survey (EAWS) has tracked trends in waterbird distribution, abundance and breeding in over 50 waterbird species. Despite an overall short-term annual increase in waterbird numbers in the 2023 EAWS in comparison to previous years, data from the EAWS shows a continued long-term decline in waterbird abundance.

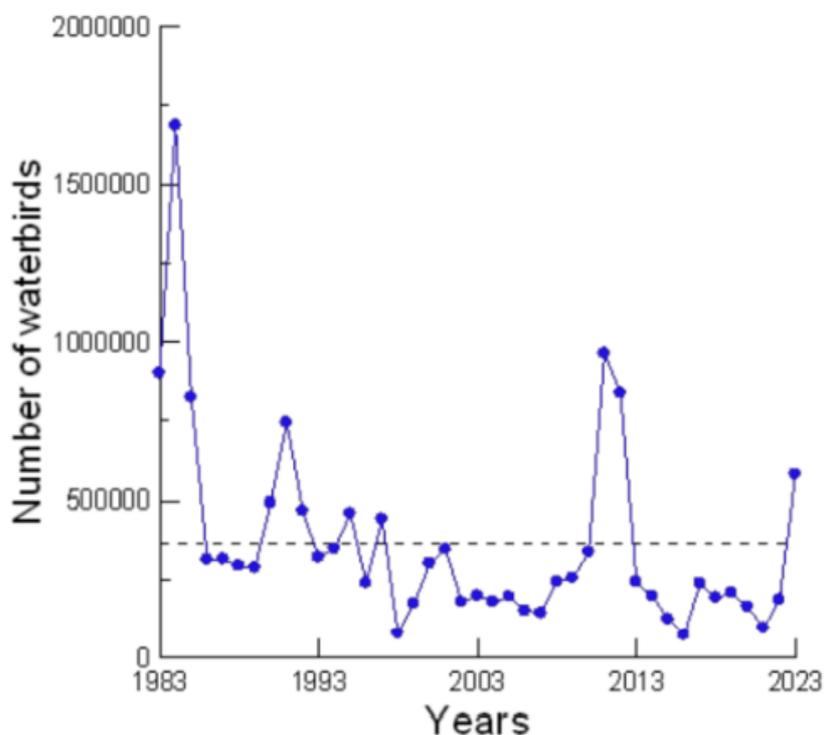


Figure 2. Waterbird abundance 1983-2023, Eastern Australian Waterbird Survey 2023

Along with the continued long-term decline in waterbird abundance, three of the four major indicators for waterbird long-term health; total abundance, number of species breeding, and areas of wetlands surveyed, also continue to be in long-term decline.

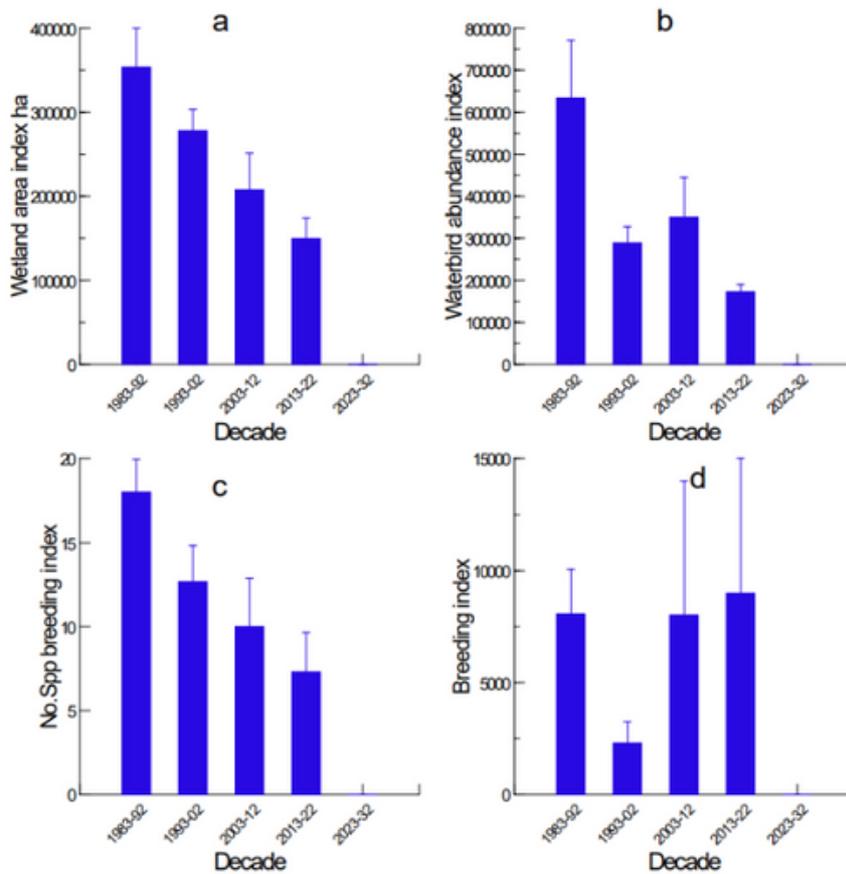


Figure 3. EAWS indices over time a) wetland area, b) total abundance, c) number of breeding species, and d) breeding 1983-2023, Eastern Australian Waterbird Survey 2023

The latest survey released in October 2023 also found five out of eight native duck species to be in significant long-term decline (Porter et al., 2023).

“Long-term trends are more informative for predicting population status than year to year fluctuations.” (Porter et al., 2023).



Image 2. Five out of eight native duck species are in significant long-term decline, Eastern Australian Waterbird Survey 2023

Habitat loss and climate change have been indicated as key determinants for waterbird population decline (Select Committee on Victoria’s Recreational Native Bird Hunting Arrangements, 2023). With the effects of climate change predicted to increase over time, and the ongoing degradation of viable wetlands, the continuation of recreational duck hunting will continue to exert downward pressure on duck populations and exacerbate the long-term decline of duck populations.

As stated in the tabled report following the Parliamentary Inquiry into Recreational Native Bird Hunting (2023):

“In the context of decreasing habitat and the impacts on the environment caused by climate change and water management, native bird hunting puts undue pressure on already strained bird populations” (p. 69).

4. Legislative considerations

Wildlife Victoria contends a continuation of the annual duck shooting season is inappropriate in the current legislative context.

The Victorian government is soon to introduce new Animal Care and Protection laws legislation that will replace the Prevention of Cruelty to Animals Act 1986 (POCTA).

“The Objectives of the new laws would recognise that animals have the capacity to feel, perceive their environment, and to have positive and negative experiences like pleasure and pain – that is, that animals are sentient.” (Department of Jobs, Precincts and Regions, 2022)

The new laws and the inclusion of sentience is incredibly important to the decision to continue recreational duck hunting in Victoria. The pain and suffering caused to waterbirds during duck hunting is well documented. As highlighted in the tabled report from the Select Committee on Victoria’s Recreational Native Bird Hunting Arrangements (2023), hunting stakeholders are aware that wounding is an inevitable part of duck hunting. Further, the development of a wounding reduction action plan highlights stakeholder consensus that wounding is occurring at an unacceptably high rate (estimated between 6% and 40%). The wounding rate will be discussed further under Animal Welfare consideration.

Wildlife Victoria asserts that the continuation of an annual duck shooting season is incompatible with the proposed new animal welfare laws.

5. Compliance and enforcement capability

Wildlife Victoria contends that the GMA’s ability to effectively monitor and enforce shooter compliance throughout an annual duck hunting season is extremely limited. If the annual duck shooting season is continued the GMA must be able to demonstrate the effective monitoring and compliance of a statewide hunting program.

Wildlife Victoria refers to the Assessment of the GMA’s Compliance and Enforcement Function (Fisher and Davey, 2017 – the “Pegasus Report”) and its findings of deep structural and operational problems within the GMA:

Key Findings, Pegasus Report

- The GMA has not been able to effectively deliver its compliance and enforcement responsibilities
- Non-compliant behaviours and unsanctioned breaches of the game hunting laws are widespread and commonplace
- The GMA is regarded is [sic] perceived by its external stakeholders and its own staff as unable to positively influence hunter behaviour or effectively sanction illegal or irresponsible behaviours
- The GMA lacks the scale and critical mass to effectively enforce the existing game hunting laws within the existing policy and compliance framework

Wildlife Victoria acknowledges the Pegasus Report is now six years old and assumes that the GMA has since addressed some of the report’s findings and recommendations, however GMA monitoring and enforcement capability was also raised again in 2023.

The Select Committee on Victoria’s Recreational Native Bird Hunting Arrangements (2023) also highlighted the ongoing inadequacy of the GMA to effectively monitor hunters and to enforce compliance:

Key Findings, Parliamentary Inquiry into Recreational Native Bird Hunting

Finding 10: The Game Management Authority has made significant progress to implement changes based on the findings of the Pegasus report in 2017. However, there are inherent difficulties with the Game Management Authority’s legislated compliance requirements as identified in the report, which in the Committee’s view cannot be rectified without significant investment in additional resourcing.

Finding 12: Victoria’s land available for recreational native bird hunting is geographically vast and dispersed. This makes it improbable for the Game Management Authority to enforce compliance with hunting regulations with the resources available.

Wildlife Victoria notes there have been no staffing increases within the GMA since 2020 (GMA 2020-2023).

Wildlife Victoria’s operation of a Veterinary Triage Unit during the duck hunting season’s opening week is ostensibly doing work that the GMA should perform. Wildlife Victoria’s veterinary assessment and record keeping provide evidence of non-compliance which is then provided to the GMA for follow-up. All Wildlife Victoria’s veterinary notes from the 2023 duck hunting season were also provided to the Select Committee of the Parliamentary Inquiry into Recreational Native Bird Hunting and were used to demonstrate incidents of non-fatal wounding, and the shooting of threatened and non-game species.

Based on the findings of the 2017 Pegasus Report and the 2023 Parliamentary Inquiry into Recreational Native Bird Hunting Tabled Report, Wildlife Victoria has serious concerns regarding the Game Management Authority’s ability to effectively monitor and enforce compliance for duck shooting based on available resources and the geographical spread of shooters on wetlands across the state.



Image 3. All injured ducks found in field were assessed and euthanised by Wildlife Victoria’s veterinary team due to injuries

6. Community sentiment

Wildlife Victoria underscores a pronounced disparity in public opinion regarding duck shooting, with the majority of Victorians expressing opposition to its continuation and less than 0.5% of the state's residents actively engaging in the activity.

Approximately 6.8 million people call Victoria home (Invest Victoria, 2023). Of those, only 22,043 held a duck hunting license in 2023, representing less than half a percent of the Victorian population (0.32%). The Game Management Authority has recorded an overall long-term decline in the number of licensed hunters registered in Victoria (GMA, 2023).

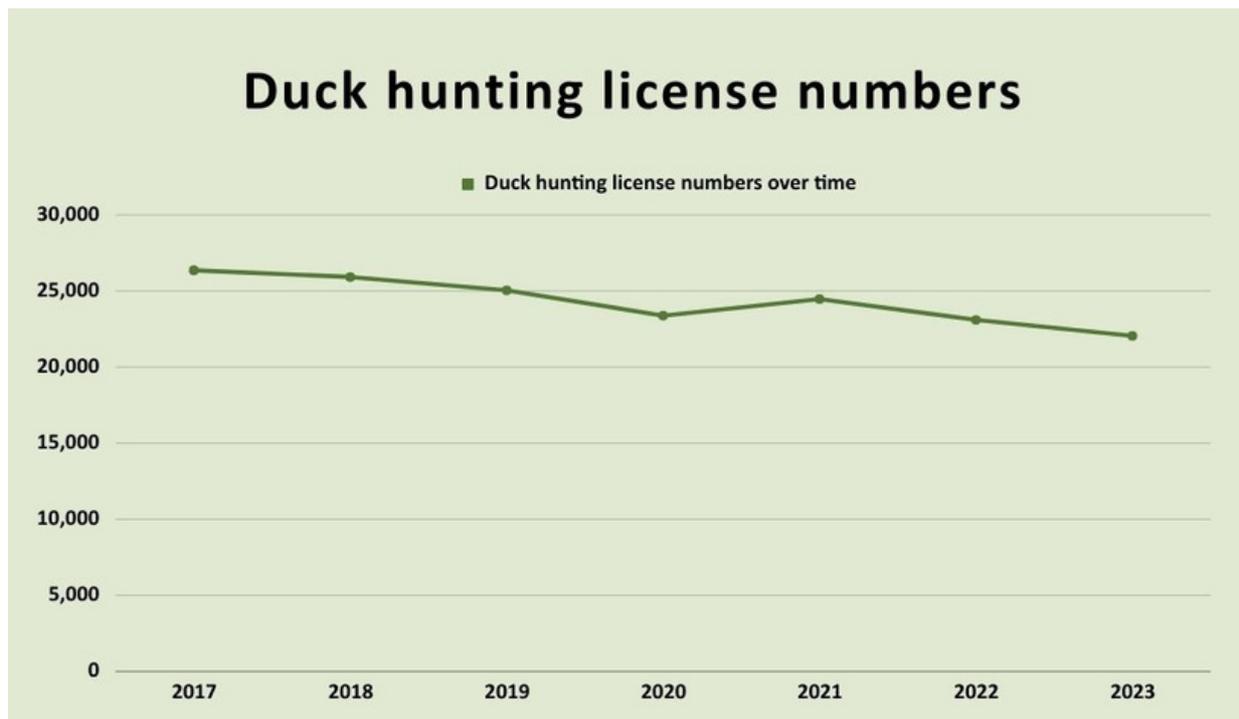


Figure 4. The number of hunters holding licenses with duck entitlements is in decline

Of the 22,043 Victorians holding a duck hunting license in 2023, it is estimated only 65% of those participated in the 2023 duck hunting season (14,118) (GMA, 2023). This represents 0.20% of Victoria's overall population.

As the number of Victorians participating in duck hunting has declined, community support for a ban has increased. An RSPCA survey found 66% of respondents Victorians (RSPCA, 2023) were concerned about ducks and other birds being shot for recreational purposes.

Throughout Wildlife Victoria's advocacy for an end to duck hunting our supporters, followers and donors have been vocal and determined in demonstrating their support for a ban. Wildlife Victoria's social media audience is over 87,000 and a potential media reach over one billion.

A sample snapshot of the many messages Wildlife Victoria has received regarding duck hunting over the last 12 months:



Jen, wildlife rescuer

"Duck season is harmful for all wildlife because it pulls rescuers away from being available for other wildlife and increases the demands for our services with injured wetlands birds. I spent the weekends on the wetlands with other dedicated rescuers - this pulled me away from being available for kangaroos, wombats, possums, birds and other animals who needed to be helped, and I am just one of many who had to make the difficult decision about whether or not to be on call for WV and other rescue groups, or be on the wetlands where carnage was guaranteed. Hopefully this was the last season!" "



Sharon, donor

"Thank you for everything you do and let's get this duck hunting stopped!"

Mae, Facebook follower

"It has to stop. Thank you for your work caring for our amazing wildlife."

Jules, X follower

"Submission completed. Thank you to all of the compassionate and selfless volunteers continuing the fight to bring this abhorrent 'sport' to it's long overdue demise."

Myza, X follower

"I don't understand how hunting can be ever seen as a sport or a type of recreation. I don't see it's purpose. Why is it okay to kill or hunt an animal?"

Shonz, Instagram follower

"A momentous day! But you're right, it's not over just yet. We must continue putting pressure on the government. All recommendations (of Parliamentary Inquiry) have to be adopted."

Ollie, Instagram follower

"It's just heartbreaking 💔 it must stop. I've prepared my submission for the inquiry and I encourage everyone to do the same. Strength in numbers 🙌🏻 For the Ducks 🦆"



Sue, Facebook follower

"Thank you for your invaluable advocacy and care for wildlife. Recreational duck shooting is a blight on our state and its demise can't come soon enough. Hopefully the Victorian Government will catch up with WA, Qld and NSW where it's been banned for decades. Those states have never looked back and neither will Victoria."



7. Economic benefit

Wildlife Victoria asserts that the economic benefit of duck hunting cannot be verified and contends that it is insignificant given the very small number of Victorians that participate in the activity (less than 0.5% of the population).

Key Findings, Parliamentary Inquiry into Recreational Native Bird Hunting

Finding 7: There is little data on the direct economic impacts of native bird hunting in Victoria. Total figures provided to the Committee had a significant difference in their range and had inconsistent methodology.

The Economic contribution of recreational hunting in Victoria report (Department of Jobs, Precincts and Regions, 2020) is the most recent governmental report on hunting's economic contribution however the figures in the report cannot be verified as there is no cost-benefit analysis and rather relied heavily on shooters to self-report spending.

Furthermore, the report states that any economic benefits that can be attributed to hunting would be reallocated to other economic activities such as camping, fishing, and target shooting, if there were to be a ban on hunting.

In contrast, the economic benefits of birdwatching and wildlife tourism are well documented. Wildlife Victoria highlights the findings of the Australia Institute report *Out for a duck – An analysis of the economics of duck hunting in Victoria* which found “revenue from non-hunting tourism is far more important to Victoria’s economy. In fact, more than half of survey respondents would be less likely to holiday in an area with duck hunting” (Campbell et al., 2012, p. 2).

If duck hunting is to continue in 2024, Wildlife Victoria asserts it is necessary and timely for the government to complete a comprehensive and up-to-date review of the economic, environmental, and reputational cost to the Victorian public.

8. Ecological concerns - risk to threatened and non-game species

Duck hunting represents an unacceptable risk to threatened and non-game species with evidence collected by Wildlife Victoria that shooters are unable or unwilling to identify and refrain from shooting threatened and non-game waterbirds.

During the opening week of the 2023 duck hunting season, Wildlife Victoria operated Veterinary Triage Units on Lake Buloke and Lake Wooroonook west of Charlton, Victoria. All injured and deceased waterbirds found by wildlife rescuers were transported for veterinary identification, assessment, treatment, and X-rays. In total, Wildlife Victoria assessed 73 native waterbirds, all of which had been left abandoned in field in contravention of duck hunting regulations. Eight of the 73 waterbirds were identified as threatened species.

One of the ducks was identified as a freckled duck, of which only 2,856 were found on the eastern seaboard of Australia (EAWS, 2023).

Given the very small geographic area that Wildlife Victoria was present, with only one veterinary unit and for a limited time during opening week, within these limited parameters the fact that eight abandoned and threatened species were identified is alarming.



Image 4. Threatened species found on day one of the 2023 duck shooting season

Identified threatened species, 2023 opening duck hunting season:

Species	Species Status	Record Count
Blue-winged Shoveler	Threatened	5
Hardhead	Threatened	2
Freckled Duck	Threatened	1
Total		8

A further six were identified as non-game species:

Species	Species Status	Record Count
Australasian Grebe	Non Game	3
Eurasian Coot	Non Game	2
Moorhen	Non Game	1
Total		6

These figures highlight shooters’ inability or unwillingness to identify species, and the inherent risk this poses to threatened and non-game species. 22 of the 73 waterbirds presented to Wildlife Victoria’s Veterinary Triage Unit were still alive and required euthanasia on welfare grounds to prevent suffering, again demonstrating shooter disregard, or lack of knowledge, of hunting regulations.

Incidents of threatened and non-game species being shot and killed during the duck hunting season was not an isolated issue in 2023 with Wildlife Victoria recording similar figures in previous years (see Appendix 1).

Case Study 1: Freckled Duck

Threatened species shot and carcass left in field.

On the opening weekend of the 2023 duck hunting season a deceased freckled duck, listed as threatened under the Victorian Flora and Fauna Guarantee Act 1988, was found deceased by a volunteer rescuer on Lake Wooroonook.

The duck was transported to Wildlife Victoria's Veterinary Triage Unit for assessment and X-rays.

Veterinary findings: Small wound left-side cheek, just caudal to commissure of beak. Small swelling palpable on right-side cheek, just caudal to commissure of right beak. Crepitus palpable right lower beak.

Radiographic findings: Pellet found on the right lower mandible with oblique fracture of mandible just rostral to ramus. Fragments of radio dense material around ventral mandible bilaterally.

Cause of death: Gunshot wound



9. Animal welfare

Central to Wildlife Victoria’s opposition to duck hunting is animal welfare. Duck hunting is an unnecessary and inherently cruel practice that causes immense pain and suffering to native animals. Wildlife Victoria has evidence of waterbirds being left in field to die a slow and painful death as a result of gunshot wounds.

The findings from the Parliamentary Inquiry into Recreational Native Bird Hunting spoke to the number of native waterbirds that would be wounded, but not killed outright, and considered this to be an unacceptable risk to animal welfare.

Key Findings, Parliamentary Inquiry into Recreational Native Bird Hunting

Finding 13: There is conflicting and incomplete evidence on the wounding rate of birds due to recreational hunting. Estimates provided to the Committee ranged between 6% and 40% of ducks are wounded each year. A wounding rate at the lowest end of this range (6%) would have resulted in the wounding of 15,700 ducks during the 2022 season.

Finding 14: Thousands of ducks would be wounded in Victoria each duck hunting season, even if measures outlined in the Draft waterfowl wounding reduction action plan 2022-2026 were implemented. The Committee considers this ongoing level of wounding to be an unacceptable animal welfare outcome.

The GMA estimated 319,908 ducks were killed during the shortened five-week 2023 duck shooting season. With an estimated wounding rate between 6% and 40%, between 19,194 and 127,963 ducks would have experienced prolonged suffering and pain due to hunter behaviour. Even within the hunting community, there is acknowledgment of the inherent cruelty that duck hunting inflicts, as demonstrated by the submission below into the Parliamentary Inquiry.

I am a licensed gun owner and a hunter. I own and use rifles and a shotgun for hunting. I think my long experience as a hunter is relevant here. I strongly oppose duck and quail hunting and think both should be banned forthwith. Shotgunning of birds results in far too many instances of wounding and inevitable, often lengthy periods of suffering, as demonstrated by GMA research ... Furthermore large numbers of birds which ARE NOT target species are wounded and/or killed by duck hunters every season. This has been demonstrated time and again by volunteer groups who have collected the carcasses or wounded specimens of these species. No ethical hunter, keen to avoid wounding at all times, and careful to identify his or her target, can accept these ongoing cruel outcomes.

Name withheld, Submission 8,212.

Image 5. Submission from the Parliamentary Inquiry into Recreational Native Bird Hunting

There is also non-direct evidence of the impact on other wildlife living near, or on wetlands, that are inadvertently negatively affected by the activities of hunters (Arthur Rylah Institute, 2019 & 2022). This was evident during the opening weekend of the 2022 duck hunting season when Wildlife Victoria witnessed breeding swans abandoning their nests and eggs as shooting commenced on Lake Bael Bael. This event likely led to the local loss of an entire generation of swans (Perkins and Eddie, 2022).

Duck hunting in any form poses a high and unacceptable risk to the welfare of Victoria's native waterbirds.

Recommendations

1. Wildlife Victoria recommends that the Victorian Government ends the annual recreational native bird hunting season opening on all public and private land from 2024.

Further to the end of recreational native bird hunting in Victoria, Wildlife Victoria also recommends the following:

2. A Government review into the role, scope, purpose and effectiveness of the GMA
3. That State Game Reserves used for duck hunting be converted into Wildlife Reserves, with appropriate investment to support and maintain the health of these important ecosystems
4. That the GMA respond proactively to the recommendations and findings of the Parliamentary Inquiry into Recreational Native Bird Hunting, by developing an action plan to address all GMA and duck hunting shortcomings outlined in the report
5. That the GMA consults with Wildlife Victoria on the development of a format and process for the supply of in field evidence to the GMA during duck hunting season
6. A more robust legal framework is introduced for the protection of all wildlife, including native birds, that does not permit hunting as an exception via ancillary legislation

Conclusion

Wildlife Victoria calls for the immediate and permanent end to duck shooting in Victoria. Duck shooting is a cruel and unnecessary practice that causes significant pain and suffering. The new animal care and protection laws (currently in review) will recognise animal sentience as “the capacity to feel, perceive their environment, and to have positive and negative experiences like pleasure and pain” (Department of Jobs, Precincts and Regions, 2022).

Wildlife Victoria asserts that shooters are unable or unwilling to adhere to duck hunting regulations that dictate wounded waterbirds must be located and humanely euthanased, highlighting an unacceptable risk to animal welfare. Wildlife Victoria has years of accumulative evidence of shooters’ ongoing inability to accurately identify threatened species and non-game species, or to comply with duck hunting regulations.

There also exists significant evidence of long-term declining waterbird populations. In 2023, the Eastern Australian Waterbird Survey reported three out of four waterbird health indices and five out of eight native duck species were in significant long-term decline. Declining populations coincide with the increasing effects of climate change and habitat destruction. The continuation of duck shooting in Victoria will place undue pressure on already struggling populations.

There is little evidence of the economic benefits in the continuation of duck shooting. The Select Committee reported that the figures provided to it had significant difference in their range and had inconsistent methodology, bringing into question what, if any, economic value the “sport” contributes.

With less than 0.5% of the Victorian population participating in duck hunting, and conversely, with community support for a permanent ban continuing to rise, it is well and truly time for duck shooting to be banned in Victoria. Wildlife Victoria will continue to advocate on behalf of our supporters, and alongside our peers, until duck hunting is permanently banned.

Together with most Victorians we can't wait to **celebrate when duck shooting ends** in Victoria and our beautiful native **waterbirds and wetlands are protected.**



Image 6. Wildlife Victoria, RSPCA Victoria, Animals Australia and Birdlife Australia joint ad published in The Age

Appendix 1

Ducks shot and abandoned in field, assessed by Wildlife Victoria, Lake Bael Bael 16-18 March 2022

Species	Species Status	Record Count
Shoveler, Australasian	Threatened	3
Duck, Hardhead	Threatened	1
Swan, Black	Non Game	2
Coot, Eurasian	Non Game	1
Duck, Pink-eared	Game species	2
Duck, Pacific Black	Game species	2
Duck, Grey Teal	Game species	10
Total		21

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Photo by Doug Gimesy

WILDLIFE VICTORIA

Prepared by Wildlife Victoria

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RSPCA Victoria's response to the Select Committee report
on Victoria's recreational native bird hunting arrangements



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 Community Outreach and Education teams. RSPCA Victoria operates Animal Care Centres across Victoria, providing refuge, care, and new homes where possible to more than 14,000 animals every year. Our team of Inspectors works to protect animals from cruelty, receiving more than 10,000 complaints every year, prosecuting offenders, and rescuing animals from dangerous situations. Our Education team contributes to prevention strategies by influencing over 13,000 young people each year about the value and importance of animals in our lives.

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

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RSPCA Policy

The RSPCA is opposed to the hunting of native birds as it causes unnecessary injury, pain, suffering, distress, or death.

Introduction

In February 2023, a Parliamentary Inquiry into Victoria's recreational native bird hunting arrangements was announced. RSPCA Victoria participated in the Inquiry with a written [submission](#) and also presented at a public hearing in front of the Legislative Council Select Committee.

On 31 August 2023, the Committee's final report to the Inquiry was released, making eight recommendations for the Victorian Government to consider.

This document outlines RSPCA Victoria's response to the report's recommendations and findings.

Majority report

Recommendation 1

That the Victorian Government ends the annual recreational native bird hunting season opening on all public and private land from 2024.

RSPCA Victoria strongly supports recommendation one.

RSPCA Victoria's primary concern is for the welfare of our native ducks and quail that are hunted as they suffer from the pain and disabling effects of their injuries. In our submission and at the public hearing, we provided evidence demonstrating that wounding rates are too high and that there is no effective way to mitigate this.

RSPCA Victoria has long advocated for a ban to native bird hunting in Victoria and welcomes the Committee's recommendation that the Victorian Government ends the annual recreational native bird hunting season opening on all public and private land from 2024. We urge the Victorian Government to endorse this recommendation and take steps to amend legislation as soon as practicable to facilitate this. We appreciate that it may take time to make the legislative changes needed to enact this change and therefore, if these changes cannot be made in advance of the 2024 season, propose that the Minister for Agriculture and the Minister for Environment and Outdoor Recreation amend the seasonal arrangements set out in the *Wildlife (Game) Regulations 2012* to cancel the 2024 season while the legislative amendment process continues.

Recommendation 2

That the Victorian Government retains existing exemptions to hunt and control native birds under the Authority to Control Wildlife framework to control bird populations impacting on agricultural and other land.

RSPCA Victoria agrees with recommendation 2.

The RSPCA acknowledges that in some circumstances it is necessary to manage populations of wild animals, native or introduced. There are three main reasons used to justify the management of wild animals:

- to protect the welfare of individual animals
- to help conserve a threatened, endangered, or vulnerable native species
- to reduce adverse impacts on human activities or the environment.

Any measures taken to manage wild animals must recognise that whether an animal is native, introduced or viewed as a 'pest' does not affect its capacity to experience pain, suffering or distress.

It is essential that all practical non-lethal wildlife control methods are considered before an individual applies for an Authority to Control Wildlife (ATCW) or lethal control. Management activities (such as on-ground intervention or control) should only be undertaken if it is likely that the aims of the control method can be achieved. The methods used must be humane, target-specific, and effective.

Our understanding of the ATCW approval process is that a thorough property inspection and damage assessment must be undertaken by a Forest and Wildlife Officer to confirm the cause and need for an ATCW, including any measures taken to manage the issue. Requirements of the *Wildlife Act 1975* must be met prior to the approval of any application.

RSPCA Victoria supports the Committee's recommendation to retain existing exemptions to control native birds under the Authority to Control Wildlife framework where it has been clearly demonstrated that they are having an adverse impact on human activities and where the control undertaken is humane and effective.

Recommendation 3

That Traditional Owner hunting rights are retained under existing legislation.

RSPCA Victoria notes recommendation 3.

RSPCA Victoria acknowledges Traditional Owner legislation and hunting rights which are

recognised under the *Traditional Owner Settlement Act 2010* and the *Commonwealth Native Title Act 1993*. The *Native Title Act 1993 (Cth)* plays a vital role in recognising the rights and interests of Aboriginal and Torres Strait Islander people, including activities such as traditional hunting, fishing, and gathering.

Traditional hunting poses many challenges in terms of animal welfare regarding the methods and equipment used and the difficulty in achieving immediate loss of consciousness and/or death. Hunting practices may differ among different Aboriginal communities and the methods used for killing native birds can also vary in humaneness. An important aim for traditional hunters is to preserve the practices used by their predecessors, which may exclude using the most humane method.

Recommendation 4

That State Game Reserves used for duck hunting be converted into Outdoor Recreation Reserves to provide greater access to outdoor recreation for all Victorians, with appropriate investment in camping, boating, and related infrastructure.

RSPCA Victoria supports recommendation 4.

The recommendation to convert State Game Reserves into Outdoor Recreation Reserves to expand recreational opportunities for all Victorians is a commendable initiative. This will provide Victorians with greater opportunities to connect with nature, ensuring that wildlife that currently inhabit these reserves remain protected, and their habitats preserved.

Additional Outdoor Recreational Reserves in regional Victoria have the potential to boost ecotourism and foster economic growth in regional towns by generating tourism-related income, job opportunities and infrastructure development. They may also contribute to the wellbeing and conservation of these natural areas.

Responsible planning and investment in camping, boating, and related infrastructure should be considered alongside a strong commitment to preserve the wetlands, particularly Ramsar-listed wetlands. Balancing the needs of both recreation and conservation is essential to achieve a sustainable and inclusive approach to land management.

Recommendation 5

That the Victorian Government provides additional resources to the Department of Energy, Environment and Climate Action and Parks Victoria to better control non-native invasive species.

RSPCA Victoria agrees with recommendation 5.

Many introduced animals have an adverse impact on human activities, health and wellbeing or the environment. These adverse impacts include:

- negative impacts on the welfare of native species due to predation, competition for food and shelter, the spread of disease and destruction of their habitat
- land degradation and effects to the ecosystem
- losses to agricultural, horticultural and forestry production, including grazing competition, damage to crops, predation on domestic animals and damage to infrastructure
- risks to public health and safety
- other human activities such as tourism, recreation, and transport.

The RSPCA acknowledges that, in certain circumstances, it is necessary to manage populations of wild animals in order to reduce these impacts. RSPCA Victoria supports the Committee's recommendation that the Victorian Government provides additional resources to the Department of Energy, Environment and Climate Action and Parks Victoria to better control non-native invasive species.

Management and control programs must be aimed at reducing adverse impacts rather than simply reducing the number of animals. This should be used in accordance with nationally developed strategies and guidelines to assist with eradication planning and assessments.

When considering what constitutes improved control measures this should include options that are more effective as well as being relatively more humane.

Recommendation 6

That the Victorian Government amends the Victorian wildlife framework to discontinue the use of lead shot for all types of bird hunting and undertakes further investigation into plastic pollution and other forms of wetland degradation as a result of hunting.

RSPCA Victoria support recommendation 6.

Lead poses serious welfare concerns for bird species and other wildlife that are shot or ingest bullets or bullet fragments. When there is a build up of lead in the body, lead toxicosis, or poisoning can occur, causing negative impacts on health, reproduction, behaviour and can even lead to death.

Where bird hunting is to continue, the use of lead shot must be discontinued to ensure the welfare of birds is protected, and to avoid any secondary impacts from lead exposure in the environment which may contaminate the waterways and soil.

Hunting also contributes plastic litter into the environment through discarded shotgun shells and

plastic wads which when released, travel significant distances with each shot and cannot be easily retrieved. The accumulation of plastic pollution can lead to habitat degradation, water contamination, is harmful to wildlife and are known for their long-lasting durability, meaning they can persist in the wetlands for many years.

Recommendation 7

That the Victorian Government reviews the process to report damage or destruction of Aboriginal cultural heritage and introduces additional protections for these sites including appropriate signposting and a review of the current penalties for cultural destruction.

RSPCA Victoria notes recommendation 7.

Recommendation 8

That the Victorian Government requires hunters participate in an Aboriginal cultural heritage awareness education program.

RSPCA Victoria notes recommendation 8.

Minority reports

There were three minority reports submitted in dissent to the Committee's final report recommendations and findings. Minority reports were submitted by:

- Mr Jeff Bourman MLC (Shooters, Fishers, and Farmers Party)
- Ms Sheena Watt MLC (Labor Party)
- Ms Melina Bath MLC, Mr Evan Mulholland MLC & Mrs Bev McArthur MLC (The Liberal and Nationals)

RSPCA Victoria does not support or agree with any recommendation that suggests the Victorian Government allow the continuation of recreational native bird hunting in Victoria.

The Committee's final report provided the following justifications for recommending a ban on native bird hunting:

- The existing pressure on native bird population decline over the long term caused primarily by loss of habitat across the Murray Darling basin and exacerbated by climate change, particularly as Australia approaches another an El Niño cycle.
- Animal welfare concerns regarding wounding rates, which cannot be completely avoided.

- The unacceptable wounding and death rate of threatened bird species, whether accidental or intentional.
- The amount of public land that excludes non-hunters during the season—which is up to 3.5 million hectares in total—and the reduction in local amenity associated with hunting.
- The inability to enforce an appropriate level of compliance due to the large area covered by native bird hunting and a lack of knowledge of when and where hunting is occurring.

An extensive amount of research and evidence has been provided throughout the Inquiry, including 10,402 submissions and 28 sessions of public hearings, allowing the Committee to gain a comprehensive understanding of native bird hunting, and any concerns associated with it, which may impact native birds and the environment.

We believe that the recommendations proposed in the majority report are the most appropriate ways to address those concerns.

RSPCA Victoria trusts that the Victorian Government will not endorse any recommendation which advocates for the continuation of native bird hunting arrangements, due to the unnecessary pain and suffering caused to the animals involved.

Mr Jeff Bourman MLC - minority report

Recommendation 5

The Wounding Reduction Action Plan should be immediately released and discussed.

Based on research provided by the Game Management Authority (GMA) from the draft Waterfowl Wounding Reduction Action Plan (WWRAP), the wounding rate for ducks is estimated to range between 6% and 40%.

Finding 14 in the Committee's majority report states:

'Thousands of ducks would be wounded in Victoria each duck hunting season, even if measures outlined in the Draft waterfowl wounding reduction action plan 2022–2026 were implemented. The Committee considers this ongoing level of wounding to be an unacceptable animal welfare outcome.'

RSPCA Victoria agrees that the ongoing level of wounding is an unacceptable animal welfare outcome and does not believe the WWRAP will be able to adequately reduce the number of wounded birds during the hunting season if it was to continue.

Liberals and Nationals – minority report

FINDING 2

Game hunting in Victoria is a sustainable activity based on science and conducted in a safe and responsible way. Recreational native bird hunting is highly regulated and under the Sustainable Hunting Action Plan (SHAP), education, animal welfare and research are being strengthened.

Native bird hunting has a significant animal welfare, social and environmental impact and cannot be supported sustainably into the future. In our submission, we provide evidence to support this.

FINDING 15

Loss of wetland habitat is the key issue effecting waterbird populations and hunting has a very small effect that is considerably overridden by loss of habitat.

There are many threats affecting the decline of bird populations, and if hunting continues, then we risk reducing populations even further. Putting an end to native bird hunting will eliminate additional pressure on native bird populations.

Recommendation 4

The Victorian Government should continue to use the Interim Harvest Model (IHM) and fully fund the transition to an Adaptive Harvest Model (AHM) within three years.

Finding 17

In Victoria duck hunting is sustainable and regulated according to an Adaptive Harvest Model based on good science. Hunting does not put a dent in the population given the biology of ducks – they are prolific breeders.

The Interim Harvest Model uses information from long-running duck population data exploring the relationship between game duck abundance and habitat availability. RSPCA Victoria is 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 which does not support this finding, that duck hunting is sustainable.

In addition to the unacceptable wounding rate, duck hunting should not continue due to the long-term decline in game bird populations, failure of the species to respond to favourable conditions, and significant risk to biodiversity.

FINDING 18

Hunting has little impact on game bird populations, because mortality impacts from hunting, predation, starvation, malnutrition, and disease are not additive but are compensatory. Competition for food is often reduced when hunting or predators remove some animals from the population and therefore fewer animals die from starvation, malnutrition, sickness, or disease.

Human interference with the death of an animal through hunting should not be considered as compensatory. This finding does not take into account duck and quail that are wounded and not killed outright. Wounded birds not retrieved and killed will suffer and some will eventually die from their injuries. Based on the number of wounded birds during the open season (between 6-40%), in conjunction with evidence showing the decline in populations, demonstrates that this activity should not continue.

In addition to the risks of being shot or wounded, several threatened and endangered species are also highly susceptible to disturbances from hunters. Constant disturbance over days, weeks and months can result in distress and starvation. Longer term impacts include the reduction in numbers of all birds (not just game species) and reduction in species richness.

FINDING 4

Australia's peak hunting body runs accredited training programs on the use of firearms and game bird hunting, providing a sound pathway to licensing of game bird hunters

Finding 22

Native game bird hunting does not pose an added threat to non-target species because licenced hunters are trained to take care to avoid impact on non-game species.

Native bird hunting poses a significant risk to non-game species who may be accidentally killed or injured through misidentification or poor shooting skills. This is particularly concerning in relation to the many endangered species that share the same habitats with game species. Mandatory shooting proficiency testing is not required for hunters in Victoria, and furthermore, in Denmark, where it is made mandatory, alongside other elements of targeted awareness and education, wounding still remains at an unacceptable rate of 10%.

The Waterfowl Identification Test (WIT) is taken prior to applying for a game license to hunt duck. The test is only required to be taken once, with no renewal or refresher unless determined by the court if hunters are convicted of shooting non-game birds. There is evidence to suggest that hunters often cannot differentiate between game and non-game birds which is particularly concerning for endangered species such as the Freckled and Blue-billed Duck.

Ms Sheena Watt MLC – minority report

Recommendation 1

That the Victorian Government implements more stringent management, regulation, and compliance in regard to the annual recreational native bird hunting season. That these strengthened provisions apply to all existing public and private land that is currently used for native bird hunting and that the further restrictions and protections are to be implemented as recommended in this report.

Recommendation 5

The GMA should receive further recurrent funding and resourcing to be able to check compliance adequately and effectively with native bird hunting requirements.

It has been acknowledged by Government under the Sustainable Hunting Action Plan that wounding is a consequence of hunting. RSPCA Victoria does not believe that implementing more stringent management, regulation and compliance on native bird hunting will be able to effectively reduce or minimise wounding from native bird hunting.

Denmark, a world leader in wounding reduction noted that even with the most successful wounding action plan implemented, there is still room for improvement. Developed in 1997, the plan took over 20 years to notice any significant reduction in wounding, with wounding rates still as high as 10%.

As a regulator, RSPCA Victoria appreciates the difficulty the GMA faces in trying to effectively enforce legislation. Due to the geographic size and number of wetlands in Victoria, with 69% of these occurring on private land, regulating this activity becomes extremely difficult. We do not believe it is possible to effectively enforce compliance, even if the GMA was provided with additional resources. With just 11,000 active duck hunters, and 2,500 active quail hunters licensed in Victoria, the resources needed to ensure compliance would be disproportionate to the number of Victorians that participate in hunting.

Recommendation 6

The Victorian government strengthened the requirements to be able to receive endorsement for duck and quail hunting licences by instituting a yearly competency and knowledge test for duck and quail hunters in addition to making the waterfowl identification test a yearly requirement.

As quail hunters are not required to undergo species identification testing, and the Waterfowl Identification Test is only required as a once off for duck hunters, any further knowledge or proficiency testing for game license holders would be beneficial. This could potentially reduce the

risk of endangered species being shot or injured; however, this would not eliminate the wounding of birds entirely and this remains an ongoing animal welfare concern.



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