

6 January 2021

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Submitted by email: graeme.ford@gma.vic.gov.au

**Animals Australia's submission regarding
Environmental and Population Conditions Relevant to Duck Shooting in Victoria 2021**

Dear Graeme,

Animals Australia appreciates the opportunity to comment on data and information available to stakeholders with respect to deliberations pertaining to a potential 2021 Victorian duck hunting season – including the Game Management Authority (GMA) document 'Considerations for the 2021 duck season' (hereafter, "**Considerations 2021**").

As a preliminary and relevant matter, we have a number of serious concerns regarding the GMA's 24 December 2019 document entitled '2020 Duck Hunting Season Arrangements' (hereinafter, "**GMA Advice to Ministers**") which was provided to Minister for Agriculture Jaclyn Symes and Minister for Energy, Environment and Climate Change Lily D'Ambrosio for the purposes of making recommendations for the 2020 duck season. We have outlined these concerns in Section 1 below and would appreciate a formal response from GMA in relation to these specific matters.

The remainder of the sections below pertain more broadly to 2021 duck season considerations.

1. GMA recommendations document provided to Ministers 24 December 2019

Game Duck Abundance

Pages 34, 35 and 50 of the GMA document "Considerations for the 2020 Duck Season" (hereafter "**Considerations 2020**") make it clear that, although both waterbird and game duck abundance across the eastern states increased by 8% from 2018 to 2019, according to the 2019 Aerial Survey of Wetland Birds in Eastern Australia (hereafter "**EAWS 2019**"), these increases occurred outside Victoria and waterbird abundance in Victoria actually fell by 40% year-on-year.

Animals Australia emphasised this point very clearly in our 13 December 2019 submission to GMA in relation to the proposed 2020 duck season on both pages 1 and 3. Animals Australia's Director of Corporate Affairs Tim Vasudeva also specifically raised this point as part of our presentation to the stakeholder's meeting hosted by GMA on 13 December 2019 which was attended by Graeme Ford, Simon Toop, Zac Powell and Lauren Clay from GMA as well as representatives from Field & Game Australia, the Sporting Shooters' Association of Australia, the Australian Deer Association, the Victorian Department of Jobs, Precincts and Regions, the Victorian Department of Environment, Land, Water and Planning, RSPCA Victoria and BirdLife Australia.

Mr Vasudeva raised this issue specifically at the start of our presentation, as we had seen comments from hunting organisations in the media suggesting that an 8% increase in bird abundance meant the Victorian Government should permit a full duck season (i.e. failing to mention the 40% fall in Victorian waterbird numbers).

Separately, the EAWS 2019 survey report had specifically made the point that, due to severe drought conditions in the Murray-Darling Basin in particular (which experienced its worst 2-3-year drought period in 120 years) “Waterbirds were concentrated on a small proportion of wetlands and less widely dispersed than in the previous year; 11 wetlands supported more than 5,000 waterbirds representing 50% of the total abundance. More than 52% of surveyed wetlands supported no waterbirds (includes wetlands that were dry).” In other words, waterbirds were even less mobile than usual in terms of their migration between states. On this basis, the 40% fall in waterbird abundance in Victoria is an even more important statistic to emphasise given that is geographically where hunting is always set to occur.

Despite this, GMA presented the bird population data within the GMA Advice to Ministers as follows:

Core Message (page 1)

“Although conditions for game ducks across eastern Australia have declined since last year, there has been a small increase in game duck abundance.”

Game duck abundance and distribution (page 3)

“Game duck abundance increased (8%) from last year but is 43% below the long-term average. Birds are concentrated in north/central Queensland, southern New South Wales/northern Victoria, south-western Victoria and south-eastern South Australia. They are less dispersed than last year and concentrated on remaining habitat.”

While environmental data and full attachments were provided in the full 181-page document, we know that the summary section at the front (in this case the first 8 pages) will be the focus for most recipients of the GMA advice document including the Ministers and their advisers. Bird population data will be a key data point that readers will obviously focus on, which makes the framing of this information by GMA all the more problematic.

Given the discussion on this very issue at the 13 December 2019 stakeholders meeting (i.e., 11 days prior to the issuance of the GMA Advice to Ministers) it is difficult to interpret the specific wording used as anything but deliberately deficient and misleading.

Social and economic impact of hunting

The very first issue raised by Tim Vasudeva in our presentation to the stakeholder’s meeting on 13 December 2019 was the continued reference by hunting organisations to the 2014 Victorian DEPI study (commissioned by Peter Walsh) into the 2013 hunting season which claimed an annual \$439 million benefit to the Victorian economy. Despite the fact that this study had clearly been superseded by the Federal Dept of Health national study into the economic benefits of hunting (published in September 2019), a number of hunting organisations had continued to quote the \$439 million number from the 2014 study. Mr Vasudeva strongly and clearly submitted, at the very start of Animals Australia’s presentation, that this approach flies in the face of insistence from those organisations as part of their presentation that “Decisions applied to game management must be based on facts and data, not instinct, intuition, ideology or prejudice.”

It is therefore all the more concerning to note that GMA then proceeded, 11 days later, to quote the 2014 DEPI study within their recommendations document to the Ministers as follows:

(page 4 of GMA Advice to Ministers)

“An economic review conducted into the 2013 hunting seasons found that duck hunting generated approximately \$106.3 million in economic activity annually. Assuming 2% annual growth, this figure would translate into \$119.7 million in today’s terms.”

Below is the extract from Animals Australia’s 13 December 2019 submission which refers to the 2014 Victorian study and the more up to date 2019 national study:

“Since 2014, hunting and shooting organisations have touted the \$439 million annual benefit alleged to flow to the Victorian economy from hunting-related activities following the publication of the study commissioned by the Victorian Department of Environment and Primary Industries (DEPI) entitled ‘Estimating the economic impact of hunting in Victoria in 2013.’

Importantly, this reported economic benefit did not consider what impact a ban on hunting and shooting would have on the recreational behavior and spending patterns of participants.

In 2019, a new report was commissioned by the Commonwealth Department of Health (DOH) entitled “Economic and Social Impacts of Recreational Hunting and Shooting.” The report was prepared by RMCG (the same consultancy who prepared the 2014 report commissioned by the DEPI) and was based on a survey of 16,576 hunters and shooters from all States and Territories.

This survey did attempt to explore how recreational time and spending would be impacted in the theoretical situation where hunting and sports shooting were both banned. The results paint a very different picture to the 2014 DEPI report. From p4 of the 2019 DOH report:

“The gross contribution to GDP, or the economic footprint, from recreational hunting and sport shooting activity in Australia in 2018 was estimated to be \$2.4 billion, comprising \$0.8 billion directly and \$1.6 billion as a result of flow-on economic activity.

The gross contribution does not tell us the benefits of hunting and shooting for the Australian economy, or conversely, the impact on the economy of the (hypothetical) situation where hunting and shooting were prohibited. If hunting and shooting were prohibited, hunters and shooters would redirect their expenditure to other goods and services, and in many cases to similar outdoor activities such as camping, fishing, four-wheel driving and so on. The ‘net’ contribution to the economy, taking into account the substitution of expenditure to other activities is estimated to be \$335m, or 0.02 per cent of Australia’s GDP.”

It is important to note that these are national figures, covering both hunting and sports shooting – in other words, their combined incremental contribution to the national economy is only \$335 million, of which Victoria’s share is a fraction of that, of which duck hunting’s share will be a smaller fraction again (noting that the 2014 DEPI report suggested (p25) that expenditure on duck hunting trips contributed less than 20% of the total expenditure on hunting trips in Victoria).”

2. Overview of Animals Australia Submission and Associated Recommendations

1. Despite record drought and fires, GMA recommended a (restricted) shooting season in 2020. Due to restrictions on movement associated with COVID-19, the impact on the desperately low numbers of ducks in Victoria was estimated to be only one-sixth of the previous annual average death count. **Yet despite welcome rain, the annual EAWS survey shows the situation was shockingly worse for game ducks in 2020, with population numbers down almost a quarter (23%) compared with 2019 (which was a year of record drought).** Excluding 2016, **there has been very little large-scale waterbird breeding since 2013 and the existing populations constitute core breeding stock**¹. Average lifespan of a duck is around 4 years², and populations are already failing. Simple arithmetic shows that **populations are heading for catastrophic failure.** (Page 5 of this submission.)
2. In our view, there is a fundamental difference between the GMA’s approach to its “sustainability” mandate, and the legal meaning of s5(a) of the GMA Act. **We respectfully ask that GMA obtain high level arms-length expert opinion on this before finalising its advice to the Ministers.** GMA appears to be pursuing sustainability OF hunting rather than sustainability IN hunting. The two are not the same: the former focuses on the interests of hunters; the latter focuses on arresting the decline of population numbers and working to restore previous abundance. (Page 9 of this submission.)

¹ GMA’s *Considerations* document, Dec 2020, p42.

² Private communication from Simon Toop of GMA, 29 Dec 2020.

3. GMA's mandate also requires that it promote responsibility in game hunting, address the humane treatment of animals that are hunted, habitat conservation, and minimise negative impact on non-game wildlife, including protected and threatened wildlife. But wounding rates are around 30 per cent because fewer than one in a hundred of the state's 25,000 duck shooters have undertaken field-based training to improve accuracy³. **Duck shooters were the worst performers on GMA's recent survey of knowledge and skills, failing in particular on hunting laws, species recognition, wounding and humane treatment of waterbirds.** By any measure, GMA has failed its mandate to promote responsibility in game hunting. Quite apart from the dire environmental situation, duck shooting seasons cannot be justified while these longstanding failures are impacting animal welfare and sustainability. *(Page 11 of this submission.)*
4. With regional tourism operators still recovering from the devastating impacts of the 2019-20 summer bushfires and the coronavirus travel restrictions, the Victorian government has established the Regional Travel Voucher Scheme. The Scheme provides \$200 vouchers to spend on accommodation, attractions and tours in regional Victoria and is designed to help drive visitation to regional Victoria and support businesses and communities to recover. In July 2020 Tourism Victoria included bird watching as part of its published National Visitor Survey. The report showed that **886,000 domestic tourists went bird watching in 2019⁴ – a number which dwarfs the comparatively tiny number of hunters who participate in each duck shooting season.** Given the monetary incentive provided to tourists by the Victorian government to travel to regional destinations between March and June 2021 it can be expected that the number of bird watchers will only increase from the 2019 figure. **If duck shooting is permitted during autumn, the presence of hunters will clash directly with tourists visiting regional Victoria specifically to observe birds in their natural habitat – not being shot out of the sky.**
5. In June 2020, RM Consulting Group published a further report commissioned by DJPR as part of the Victorian Government's Sustainable Hunting Action Plan entitled "Economic contribution of recreational hunting in Victoria". That report found that the **net economic contribution** (the non-substitutable component, which would not simply be replaced by another outdoor activity if duck hunting were to be banned) was estimated to be:
- between \$19 million and \$57 million annually for all recreational game hunting in Victoria; and
 - **between \$4 million and \$10 million annually for duck hunting.**
- These figures are obviously substantially lower than the numbers hunting organisations and the GMA have continued to promote as being the prevailing estimates of the value of hunting based on the 2014 survey commissioned by then Minister Peter Walsh.
6. Although GMA did not inform stakeholders, we are now aware that the GMA Act was amended last year, with new s8A inserted. The GMA's advice to the Ministers re the 2020 season 'cherry-picked' from s8A to support its proposed modified season (rather than cancellation) and ignored relevant information provided by Animals Australia. There are a number of aspects of s8A which very much support cancellation of both the 2020 season (now past) and the 2021 season. *(Part 3 of this submission.)* Further, s8A requires that GMA must (in discharging its function to make recommendations to the relevant Ministers) have regard to the principle of an evidence-based approach, which means **considering the best available information when making decisions.**
7. There are political risks as well as biodiversity risks when government relies on GMA for advice on duck shooting. Conflicts of interest are clear. There is no independent voice to advocate for native waterbirds. The issue impacts many species and also wetland habitat. It is a biodiversity issue, **yet GMA does not include any environmental groups in its consultation.** *(Page 16 of this submission).*

³ Ibid.

⁴ <https://www.thecourier.com.au/story/6837543/the-big-business-of-bird-watching-is-taking-flight/> accessed 1.1.21.

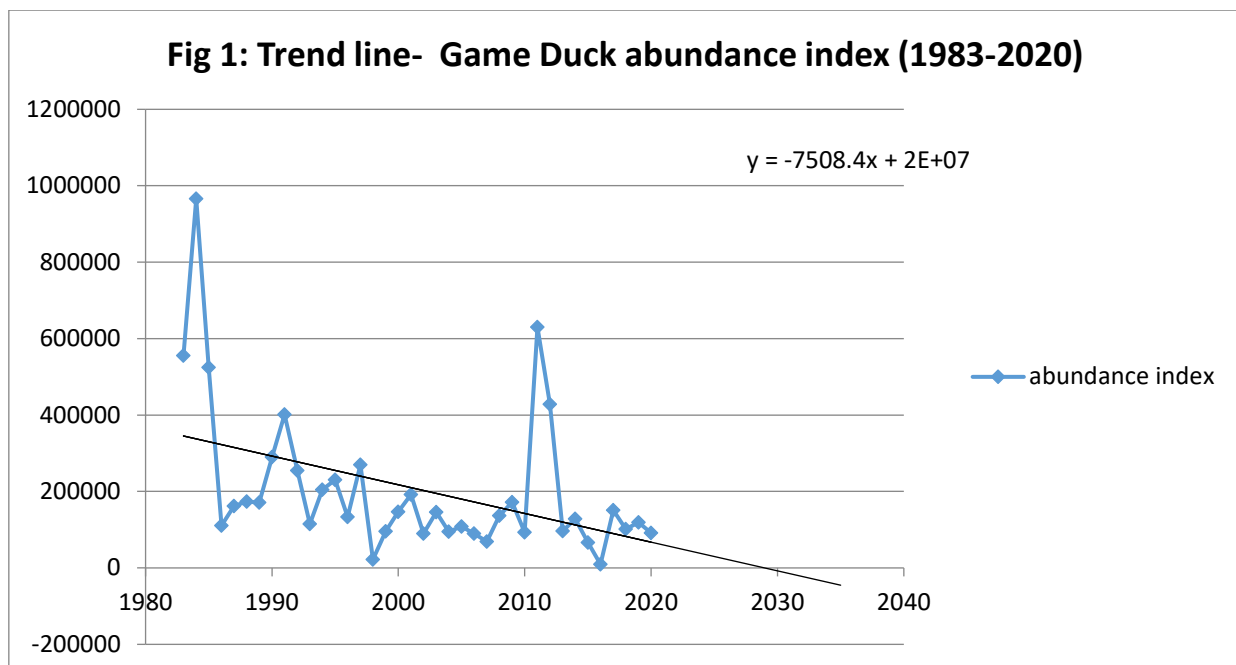
8. **Animals Australia strongly believes that the 2021 season must be cancelled, due to the 23% drop in game bird numbers, the long-term decline in species and breeding, and the fact that existing birds constitute core breeding stock. Hunting and killing of these birds will further reduce the slim chance of population recovery. A further important consideration is the evidence-based failure of GMA to promote responsibility in duck shooting through effective education in law, accuracy and best practice. Recent concrete data from GMA confirms longstanding criticism of shooters: illegal behaviour and the inhumane treatment of wounded waterbirds.**

3. Part 1 – Promote Sustainability in Game Hunting in Victoria: S5(a) of GMA Act

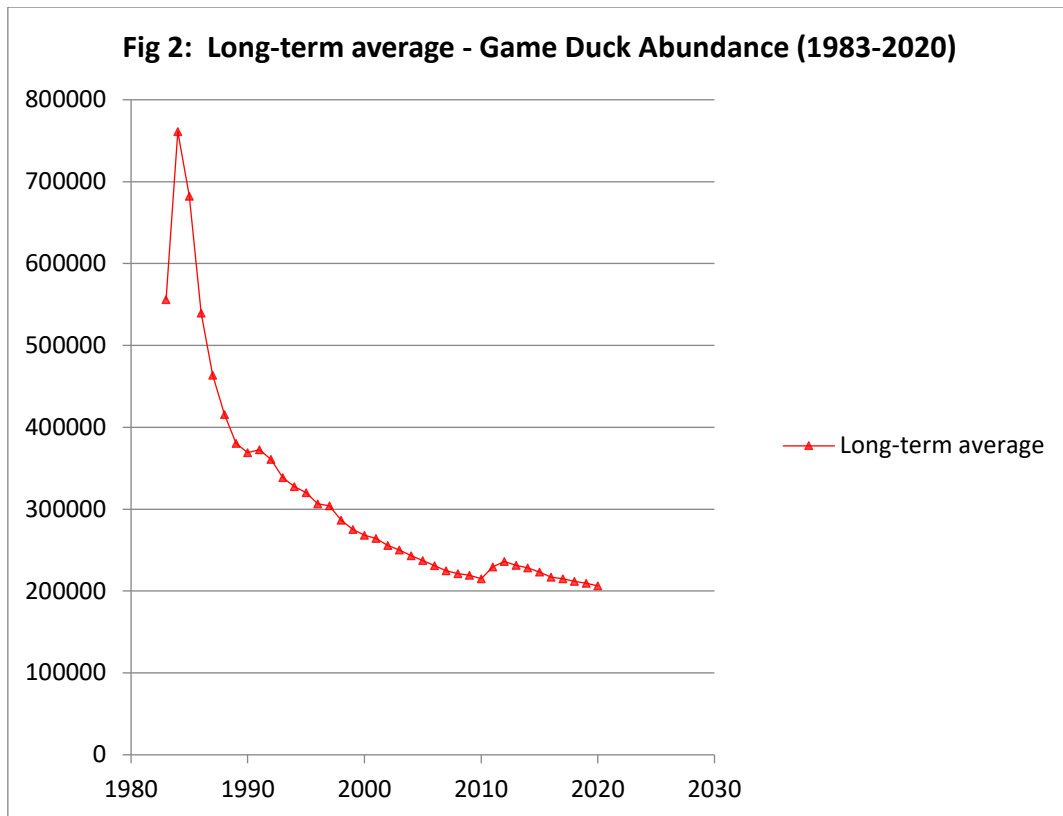
1.1 2020 AERIAL SURVEY of WETLAND BIRDS in EASTERN AUSTRALIA (hereafter “EAWS 2020”) DATA

Game duck abundance is almost a quarter (23%) less than in the previous year, which was one of record drought. GMA recommended, and the Ministers accepted, a modified shooting season for 2020, based on a slight increase (8%) of game bird abundance across the eastern states. **A shocking 23% drop in abundance - despite welcome rain - should be sufficient to cancel any 2021 shooting season.** Breeding continues to be negligible.

The EAWS 2020 confirmed that the four major indices for waterbirds (total abundance, breeding index, number of species breeding and wetland area index) continue to show significant declines over time. The EAWS summary report states that long term trends are more important for predicting population status than year to year fluctuations. Hence the graph below should ring alarm bells, with **the trend line showing likely extinction before 2030**, and possibly sooner as small populations are highly vulnerable to “shock” events such as disease and extreme weather (drought, heatwaves and violent storms).



The game duck abundance index (91,230) is currently less than half of the long-term average – see the graph below. The long-term average itself is a misleading benchmark for sustainability in that it continues to decline over the 38 years of EAWS data because abundance is declining. The graph shows that the 2013 temporary blip from the end of the millennium drought has now dissipated.



EAWS reported that all game species abundances “were well below long term averages, in some cases by an order of magnitude”. The critical significance of this statement may be lost on those unfamiliar with scientific language and we note that GMA omitted it from the *Considerations* document. However, a drop by an order of magnitude indicates a 90% decrease. A change “by an order of magnitude” is scientific terminology to describe a change by a factor of ten (such as from 1000 to 100).

Five out of eight species continue to show significant long-term declines. **Half (48%) of the wetlands surveyed had no waterbirds.**

Wetland area index was the fifth lowest since surveys began 38 years ago, up from the previous year which was a record low. Professor Kingsford explained that the rains had not made their way to wetlands:

“All that rain that we had on the Great Dividing Range, some of it is runoff, but it’s been largely captured by the large dams and not got into the river systems,” he said.⁵

1.2 GMA CONSIDERATIONS 2021 DOCUMENT

GMA’s Dec 2020 document *Considerations 2021* summarised the dire state of the environment for waterbirds:

- The extreme drought conditions between 2017-2019 “had a significant negative impact on the health of waterbirds and waterways and consequently, waterbird populations, including game ducks.”
- Most of Australia received average to below average rainfall in 2020, delivering some partial recovery only.
- Soil moisture levels are reducing due to a dry winter, spring and early summer. Hence waterbird habitat only increased marginally in 2020.

⁵ <https://www.smh.com.au/environment/conservation/drought-breaking-rains-not-enough-to-boost-wetland-bird-numbers-20201215-p56npc.html> accessed 1.1.21

- In the EAWS Bands 1 and 2, Victoria's waterbird abundance has dropped markedly, by more than half in Band 2.
- **Excluding 2016, there has been very little large-scale waterbird breeding since 2013 and the existing populations constitute core breeding stock.**
- **Hunting during periods when there is little recruitment (e.g. dry periods) removes breeding adults which can negatively affect subsequent recruitment and further drive declines in hunted species (Kingsford *et al.* 2017⁶).**

Every year, GMA omits the highly relevant data for game duck species breeding. Instead, GMA includes the breeding data for “all waterbirds” – which masks the even more desperate state of game duck breeding.⁷ In 2020 EAWS found only three waterbird species breeding, and almost all were black swans.

Given the desperately low breeding of game ducks, it is surprising that GMA did not include an estimate of the lifespan of a game duck. According to follow-up advice, the average lifespan is around 4 years⁸. **Given the lack of breeding, populations are ageing and catastrophic failure of species is likely – or perhaps is already underway, given the drop in abundance despite improved habitat availability.**

Again, the GMA Considerations included distractions from the key issues. Water storages have little relevance to most game ducks. Shooters will no doubt exaggerate the significance of recent flooding events, but floodwater does not equate to ducks. **If the floods do result in some late breeding, then it would be inhumane to shoot during the breeding season while offspring are immature. The Regulatory Impact Statement for the 2012 Wildlife (Game) Hunting Regulations claims that duck shooting is humane because it is timed to avoid breeding season.**

Shooters – and the GMA – ignore the impact of climate change and the increased evaporation when rain does fall. In our Dec 2019 submission, we included the following graph to highlight the warming of the nation:

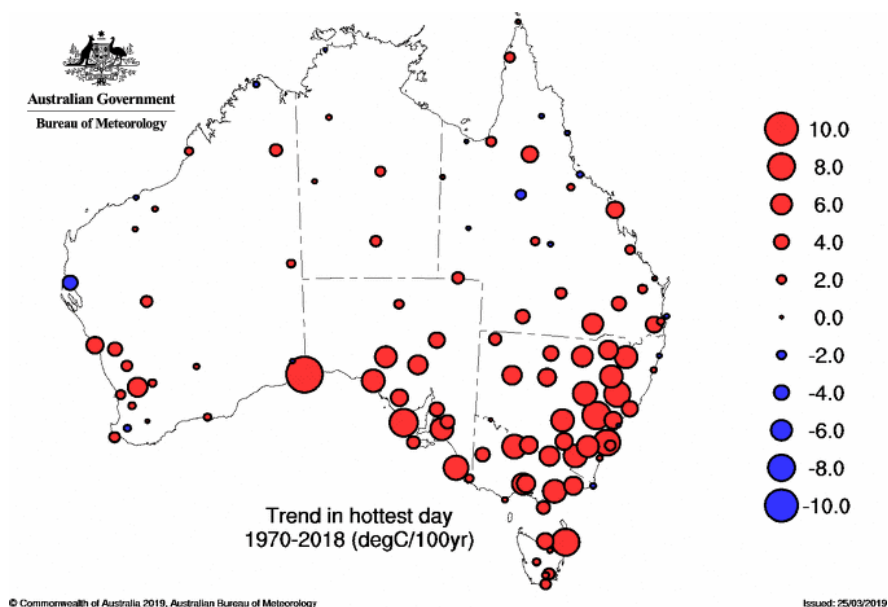


Figure 3: Trend in hottest day 1970-2018 (deg C/100yr). Image from Bureau of Meteorology⁹

⁶ Kingsford RT, Bino G, Porter JL. (2017) Continental impacts of water development on waterbirds, contrasting two Australian river basins: Global implications for sustainable water use. *Glob Change Biol.* 2017; https://wintonwetlands.org.au/app/uploads/2018/02/Kingsford_et_al-2017-Global_Change_Biology.pdf accessed 1.1.21.

⁷ Private communication from GMA, S Toop, 29.12.20 – GMA does not receive, or request, the EAWS breeding data for game ducks.

⁸ Private communication from GMA, S Toop, 29.12.20.

⁹ Australian Government Bureau of Meteorology, 'Australian climate extremes - Trend maps'. Retrieved from: <http://www.bom.gov.au/cgi-bin/climate/change/extremes/trendmaps.cgi?map=TXmx&period=1970> on 2.1.21

and we included the following comment:

*“Unfortunately, elevated temperatures mean that wetlands dry more quickly than in the past. EAWS 2019 found a record low for wetland area, but even those areas will dry further over summer. Temperature trends for Australia are startling but have been omitted from the GMA’s analysis – which as mentioned above, consistently avoids any links to climate change”*¹⁰

In its six years of operation, the GMA has “modified” the shooting season each year because one or more species was in short supply. **Yet the downward trends continue, demonstrating clearly that this approach to game management has not promoted sustainability in the accepted sense of the word.**

Relying on last-century research (well before climate change made its presence felt) the GMA previously claimed there was no evidence that duck shooting affected populations. It is encouraging to see that for the first time in any of its “Considerations” documents, the GMA has conceded that killing the core breeding stock will have a negative impact on population resilience.

Despite its mandate to promote sustainability, GMA has never included in its *Considerations* documents any acknowledgement of global warming and changes in land use (e.g. draining of swamps, diversion to irrigation) which have adversely impacted waterbirds over the long term. These factors are routinely acknowledged by waterbird experts such as Prof Richard Kingsford and his team¹¹ as factors driving the demise of waterbirds.

1.3 BLACK SUMMER

We have long argued in our annual submissions that GMA’s recommendation to the Ministers should be delayed until the full impact of summer is known. However, GMA gives priority to getting advice out to shooters so they can plan their recreational trips. Last summer provided the most powerful example of why GMA’s recommendation to the Ministers should be delayed.

GMA signed off its advice to the Ministers on 24 December 2019. Bushfires were already a serious concern and we referred to this in our submission:

*“The current and unprecedented bushfires provide a graphic and tragic illustration of, and further contribution to, the environmental stress which is affecting our community and wildlife. Meteorological projections offer no respite during summer (Considerations 2020, pp.9-15). The very last thing waterbird populations need, while at precariously low levels, is further ‘predation’ in the form of recreational duck shooting.”*¹²

Much of eastern Australia became an inferno shortly afterwards, raising alarm worldwide. After considerable delay, the government finally adopted GMA’s original proposal for a modified 2020 season.

GMA did no substantive analysis of the impact on ducks from these record-breaking bushfires. It is a common misperception to think that because birds can fly, they will escape. But many mobile animals tried to flee the fires and were engulfed. Many veteran fire-fighters said the ferocity of these fires was like nothing they had previously experienced. Wildlife were similarly unprepared for the enormity of this disaster.

Birds are high above ground as they fly, where the impact of rising heat and smoke would be greater, so they would be incinerated, leaving little or no trace. So-called “fire weather” created by massive fires involves whirlwinds and thermals that could completely bamboozle and overwhelm small birds.

Closer to earth, we have reports of Wood Ducks wandering around farmland in a dazed manner during the weeks of heavy smoke. They were later found dead.

¹⁰ Animals Australia submission to GMA, Dec 2019, p5.

¹¹ Op cit.

¹² Animals Australia submission to GMA, Dec 2019, page 2.

Precipitously, the Animals Australia submission¹³ referred to the impact of fires, in this quotation from Prof Richard Kingsford in November 2019¹⁴:

"It is grim, many of the rivers are dry ... as everybody knows we've got this gripping drought across the Murray-Darling basin and up into the north and we're just not seeing any wetlands."

The picture is grimmer at another internationally-renowned breeding ground for birds, the Macquarie Marshes, in north-western NSW.

Bushfires ravaged this area in the past few weeks, and where once there were thousands of birds counted, this year the team counted only one black duck."

Despite this, GMA's briefing to the Ministers did not include any mention of fires or fire risk. Fire authorities had been warning of escalating fire risk due to the extreme drought.

1.4 SUSTAINABILITY

As "sustainability" has not been defined in the GMA Act, the common meaning must be applied. We respectfully suggest that GMA obtain high-level specialist arms-length advice to confirm this, prior to making recommendations to the Ministers.

While earlier governments and regulators did cancel duck shooting at times of severe drought, the GMA and the Andrews government have never supported the cancellation of a season. Given the constant and severe decline in game duck abundance, this approach is at odds with the GMA's mandate (in s5(a) of the Game Management Authority Act 2014 (hereinafter, "**GMA Act**").

The GMA set a 2019 "harvest" goal of 99,547 ducks in a heavily restricted season. Due to the pandemic, the season was shortened and shooters were not keen to participate. The killing of ducks was reduced to a (self-reported) estimate of 60,403. **Yet despite that partial reprieve, game duck numbers are 23% down on last year. If GMA's advice had been fully implemented, the outcome for game ducks would have been even worse.**

GMA's advice to the Ministers last year backed its recommendation by saying that the modified season "allows the populations to recover when environmental conditions improve." Clearly that advice was both misleading and ultimately incorrect.

It is important to note also that the GMA Act does not refer to "sustainability of game species" but rather, sustainability generally. Thus, the impact of duck shooting on protected and threatened species is also directly relevant.

In 2019 the GMA combined with two other government agencies to publish a study of non-game waterbird susceptibility to disturbance by duck hunters.¹⁵ The report is thorough in examining the impact of duck shooting on the 39 threatened or near-threatened species that inhabit the wetlands where shooting occurs:

"Potential adverse effects (excluding death or injury from shotgun pellets) include: abandonment of nests or young due to the close presence of hunters in areas not normally visited by people, reduced feeding and resting opportunities due to disturbance by noise and movement, increased energy expenditure as a consequence of having to spend longer periods in flight following disturbance and reduced habitat availability resulting from the temporary abandonment of a wetland due to disturbance."¹⁶

¹³ Page 2 of Animals Australia submission, Dec 2019.

¹⁴ Kingsford's interview is at: <https://www.abc.net.au/news/2019-11-19/drought-and-water-policy-to-blame-for-water-bird-decline/11715412> accessed 1.1.21.

¹⁵ *Assessing waterbird susceptibility to disturbance by duck hunters in Victoria*, GMA, ARI and DELWP, 2019

¹⁶ *Ibid*, p2.

The disturbance is particularly distressing for migratory birds that must feed and fatten to prepare for their journey to the northern hemisphere:

“These species leave Victoria during autumn and fly non-stop for several thousand km to reach stopover feeding sites in south-east Asia where they can refuel before continuing their flight to the breeding grounds. In the weeks leading up to departure, it is critical that they can feed voraciously to reach a body weight and condition that will maximise their chances of successfully completing the migration and then breeding successfully.”¹⁷

However there seems to be a disconnect between this careful examination of duck shooting impacts on species and then the startling conclusion (p10):

“The application of these disturbance rankings and population triggers is unlikely to significantly hinder duck hunting opportunities. Given that many of the species ... do not occur in large numbers in Victoria, they are unlikely to ever trigger a management response.”

The critical decision for sustainability is the selection of the “trigger” to protect the species by closing the wetland to shooters. The trigger is a specified number of waterbirds of a particular vulnerable species sighted on a wetland. A trigger point of 1% of the known population was chosen – but that is a criterion for nominating a wetland for global Ramsar significance. Of course, that trigger would rarely be exceeded at a Victorian wetland. Also, the “known population” quoted by the report is ten years out of date in many instances (e.g. for the species with the second-worst impact from duck shooting: the Fairy Tern). Given the known long-term decline of waterbirds, it is dangerous for sustainability to rely on outdated population estimates.

An indication that the “trigger points” have been set too high is shown by the fact that the existing protections for the rare, Blue-Billed Duck and the Freckled Duck are more stringent than those developed in the report.

It is hard to avoid the view that the study was done to suggest the GMA is concerned about sustainability, while the critical ‘conclusions’ – the trigger points at which action would be taken to close a wetland – were aimed at protecting duck shooting, not wildlife. We question the independence and therefore validity of the report’s conclusions.

In our December 2019 submission to the GMA, we included (on page 10) a full-page, eye-witness account of the decimation wrought on a wetland and its non-game species, when duck shooters arrived after years of drought. The GMA briefing to Ministers failed to mention this, so we include it again (Appendix A) because we consider it very important in relation to GMA’s sustainability mandate.

The GMA’s involvement with documents relating to proposed adaptive harvest management (hereinafter, “**AHM**”)¹⁸ suggests that it views its mandate as promoting sustainability OF hunting (the recreational practice) rather than sustainability IN hunting (the wildlife and natural environment). The two are not the same, and have very different outcomes for both shooters and waterbirds:

- The June 2020 Arthur Rylah Institute document entitled “Design of a Monitoring Program for Game Ducks in Victoria” which examined potential survey designs for a proposed helicopter count of Victoria’s game ducks inexplicably included a recommendation for an annual 10% cull, at the request of GMA. (NSW uses a 10% cull in quite a different context – no recreational duck shooting, much smaller numbers culled and only at the request of rice farmers.) **An annual 10% cull in Victoria would guarantee that no season is ever cancelled. The long-term decline in species would continue until there are no ducks left.**

¹⁷ Ibid, p5.

¹⁸ Towards the implementation of adaptive harvest management of waterfowl in south-eastern Australia, Ramsey et al, 2017.

- Various discussions of AHM suggest an objective of “maximising cumulative long-term harvest”. By definition, performance against this criterion can never be assessed or evaluated. It provides cover for the GMA’s current approach of simply tweaking the parameters to enable a shooting season to go ahead every year, regardless of environmental factors, while the decline of species continues, and the trend line continues southward (Fig 1).

Such notions of “sustainability” are not what the community would consider to be “sustainability” for game ducks and the other species that are also impacted during duck shooting. Hence, they are at odds with the GMA’s mandate.

PART 2 – Promote responsibility in game hunting in Victoria – s5(a) of GMA Act

GMA’s mandate (s5(a) and s6 of the Act) also requires that it promote responsibility in game hunting, address the humane treatment of animals that are hunted, and minimise negative impact on non-game wildlife, including protected and threatened wildlife.

2.1 WOUNDING

Wounding rates are around 30 per cent because less than one per cent of the state’s 25,000 duck shooters have undertaken field-based training to improve accuracy¹⁹. Each year the GMA annual report comments on its shooter education program. It was originally tagged the Shotgunning Education Program. Then marketing consultants were called in to advise on strategies to boost participation and the program was rebadged as a “Masterclass”. However, despite these efforts and the considerable expense involved, fewer than 200 duck shooters have participated in the practical accuracy training in-field²⁰.

In the GMA 2019-20 Annual Report the problem is carefully concealed by combining the in-field training participation with that of unspecified “industry events”:²¹

“The GMA conducted three targeted in-field education events and two industry events, with more than 700 people directly engaged.”

In March 2020 as COVID-19 ravaged the world, two GMA representatives travelled to Denmark to study a program for encouraging shooters to reduce their wounding rate²². GMA has confirmed it has no specific target for decreasing the wounding rate²³. In an average year when some 350,000 ducks are ‘bagged’, there are at least tens of thousands of wounded ducks that suffer.

2.2 KNOWLEDGE AND SKILLS

The recent release of GMA’s survey of shooter skills and knowledge²⁴ showed duck shooters generally scored worst among all game shooters. Duck shooters failed in particular on hunting laws, species recognition, best practice to minimise wounding, and humane treatment of waterbirds. That result simply confirms what duck rescuers and regional residents have been observing and reporting for several decades

It is of particular concern that the Summer Waterbird Count (SWC) in Victoria is largely undertaken by volunteer members of shooting clubs, many of whom appear to be unsure about species recognition, and all of whom have a conflict of interest: higher counts increase their chance of a favourable decision on the forthcoming duck shooting season. When the EAWS data is dire (as is currently the case), shooters discount the gold-standard, independent scientific work of the EAWS and search for other reasons to justify a shooting season, such as the SWC. However, the extensive

¹⁹ Private communication from Simon Toop, GMA, 29.12.20

²⁰ Ibid.

²¹ GMA Annual Report, p17

²² GMA Annual Report 2019-20, p 22

²³ Private communication from GMA (S Toop), 29.12.20

²⁴ *Summary report of hunters’ knowledge survey findings*, GMA, August 2020

coverage of the EAWS gives the most reliable long-term assessment for sustainability of game ducks because the birds move across the country in response to conditions.

The GMA survey also revealed that a quarter of the licensed duck shooters have not provided either a valid phone number or email address to the GMA. We also note that the application form for a game licence does not require any evidence or certification regarding possession of a firearms licence.

All these findings undermine the constant assertions from GMA and politicians on both sides that duck shooting is “highly regulated, safe, sustainable and humane.”

By any measure, GMA has failed its mandate to promote responsibility in game hunting. Quite apart from the dire environmental situation, duck shooting seasons cannot be justified while these longstanding failures are impacting animal welfare and sustainability.

While the knowledge survey report attempted to dismiss the results as simply a benchmark to highlight areas for improvement in the future, the reality is that the GMA has failed to effectively promote responsibility in duck shooting. The GMA has spent years and tens of thousands of dollars in the preparation and dissemination of educational material (e.g. Hunting Manual; social media applications; participation in hunting shows and other events with shooter groups), but these results indicate the material has been ineffectual.

Following the illegal and particularly irresponsible behaviour of shooters at the 2017 duck opening (primarily uncovered by rescuers), GMA was required to commission a review of its competence. The report by Pegasus Economics was severely critical. It found GMA was “too comfortable” with shooters and issued hunting licences without any checks on hunters’ knowledge of the law or good practice²⁵:

“... with the exception of duck hunter identification skills and hound hunter knowledge skills, applicants currently seeking a licence to hunt game are not required to prove any knowledge of the law, demonstrate even a basic understanding of safe and responsible hunting practices or possess any hunting competence... The current arrangements are analogous to VicRoads providing driver education only after a licence has been allocated to drive on a public highway.”

Table 9 below (from the knowledge survey report) shows that less than 80 per cent of duck shooters were competent on the causes of wounding and identification of non-game species. Technical requirements (swatter loads) are important to minimise wounding, yet fewer than 50 per cent of duck shooters had this knowledge. The worst level of competence related to the treatment of wounded ducks, where only 13 per cent of duck shooters answered correctly.

Table 9: Duck general module - summary of correct and incorrect responses

Duck general module questions Base: % of valid respondents (no answers excluded)	Valid n	Correct %
DUG5: Spent cartridges	1,821	99
DUG12: Pellet spread	1,736	95
DUG6: Respecting other hunters	1,821	93
DUG9: Waterfowl wounding causes	1,736	79
DUG8: Non-game duck species	1,821	58
DUG3: Swatter load shot size	1,971	47
DUG2: Swatter loads	1,971	44
DUG11: Field dressing ducks	1,736	39
DUG10: Minimising wounding	1,736	37
DUG7: Identifying game ducks	1,821	20
DUG4: Swatter load risks	1,971	15
DUG1: Dispatch of downed ducks	1,971	13

²⁵ https://www.gma.vic.gov.au/data/assets/pdf_file/0011/481682/Assessment-of-the-GMAs-compliance-and.pdf, p 25, accessed 1.1.21.

Table 10 similarly shows widespread ignorance of technical requirements (shotgun patterns, shooting distance, shot materials, lead shot, allowances, loads and chokes) that are important to reduce the impact on animals and a very low 28 per cent who have the required knowledge about bringing in injured and stricken ducks (despite now legal requirements for despatch).

Table 10: Duck method general module - summary of correct and incorrect responses

Duck method module questions Base: % of valid respondents (no answers excluded)	Valid n	Correct %
DM10: Anatomical aim points	1,511	96
DM7: Shotgun cartridge characteristics	1,573	92
DM9: Maximum shotgun gauge	1,511	82
DM5: Assessing shotgun patterns	1,573	76
DM1: Shotgun patterns	1,625	61
DM3: Storing lead shot intended for other species	1,625	58
DM4: Maximum shooting distance	1,625	58
DM6: Shot materials	1,573	53
DM11: Lead shot allowances	1,511	45
DM8: Bringing ducks in	1,573	28
DM2: Sources of information for loads and chokes	1,625	24

PART 3 – Impact of the new s8A of the Act

3.1 LEGISLATIVE CHANGE AND ADVICE TO THE MINISTERS

Following an FOI request, GMA (temporarily) made available on its website the advice it provided to the Ministers on 24 December 2019 regarding the then-proposed 2020 duck shooting season.

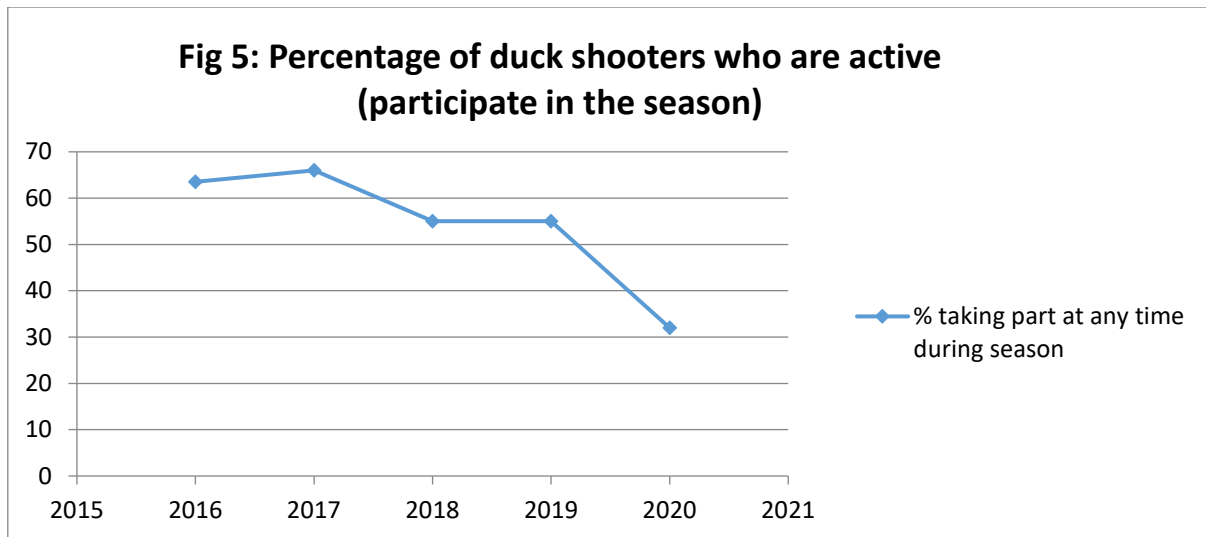
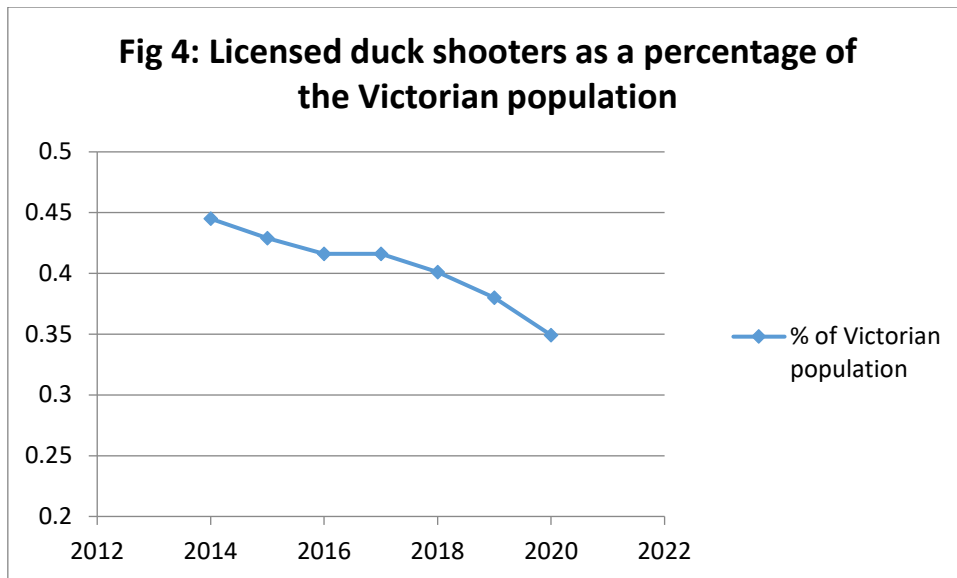
That advice noted in its core message that under the Act it “must have regard to the triple bottom-line assessments, which means an assessment of all the economic, social and environmental costs and benefits, taking into account externalities.” This is a reference to paragraph (b) in the new s8A of the Act which inserts “Guiding principles” for the exercise of powers or performance of functions.

GMA’s advice proceeded to say that its recommended (modified) season would “provide some economic benefit to regional areas and social benefits for hunters”.

All comments below refer to paragraphs within the new s8A which took effect on 17 December 2019 - just in time to influence GMA’s decision on the 2020 season. We are disappointed that GMA failed to advise stakeholders of this legislative change – contrary to the intention of paragraphs (e) and (f).

GMA’s (December 2019) advice to the Ministers also noted the new principle of an evidence-based approach (paragraph (d)). However, the advice could be viewed as “cherry-picking” from s8A because it omitted a number of pertinent aspects from the new “Guiding principles”:

- i. A balanced consideration of the costs and benefits of duck shooting according to all stakeholders - not just the opinion of shooters and the unaudited results of shooter-surveys [paragraphs (b) and (e)];
- ii. Coordination with other government agencies, in particular DELWP for its environmental expertise, especially regarding the impact of climate change - which is explicitly part of the Andrews government’s policy framework – on biodiversity loss [paragraph (a)];
- iii. Equity between persons irrespective of their personal attributes [paragraph (c) (i) (A)]: Victoria’s wildlife belongs to all Victorians - not just the shrinking minority who like to kill ducks - and non-shooters who want to protect native waterbirds;



- iv. Equity between persons irrespective of their location, including whether in a growth, urban, regional, rural or remote area [paragraph (c) (i) (B)]: the majority of regional Victorians are opposed to duck shooting because it directly impacts their families, animals and livelihoods in a negative way, yet they are not invited to attend GMA's consultation sessions. (We note that the Australian Deer Association was present at last year's stakeholder meeting even though the meeting was about duck shooting); and
- v. Equity between generations by not compromising the ability of future generations to meet their needs [paragraph (c) (ii)]: future generations are entitled to see and enjoy the abundance of waterbirds that prevailed when Kingsford started his surveys; it was this abundance that elevated a dozen Victorian wetlands to Ramsar status last century.

Further, s8A requires that GMA must (in discharging its function to make recommendations to the relevant Ministers) have regard to the principle of an evidence-based approach, which means considering the best available information when making decisions. GMA had absolute knowledge that more current data exists regarding the economics of duck hunting and yet opted to continue quoting from more dated data. GMA now also has new information/evidence of the serious inadequacy of hunter knowledge relevant to their hunting practices.

3.2 ECONOMIC AND SOCIAL COSTS AND BENEFITS

Although we were unaware of the new s8A when making our submission in December 2019, we did include a discussion of the "economic and social contributions of hunting" (pp13-14) which cast doubt on the inflated claims about its benefits. GMA chose not to mention this to the Ministers in its brief summary of our 16-page submission. Hence, we include it again (Attachment B).

In 2019 another survey was commissioned by the Federal Department of Health from the same consultants (RM Consulting Group) using a similar methodology. Its results were markedly lower than in 2013, a drop not adequately accounted for by the poor environmental conditions and declining duck populations. It is disappointing that GMA and politicians on both sides have continued to quote the exaggerated results from the 2013 survey, despite public awareness of ongoing drought and poor seasons.

In June 2020, RM Consulting Group published a further report commissioned by DJPR as part of the Victorian Government's Sustainable Hunting Action Plan entitled "Economic contribution of recreational hunting in Victoria". That report found that the net economic contribution (the non-substitutable component, which would not simply be replaced by another outdoor activity if duck hunting were to be banned) was estimated to be:

- Between \$19 million and \$57 million annually for all recreational game hunting in Victoria; and
- Between \$4 million and \$10 million annually for duck hunting.

These figures are obviously substantially lower than the numbers hunting organisations and the GMA have continued to promote as being the prevailing estimates of the value of hunting based on the 2014 survey commissioned by then Minister Peter Walsh.

For 2021, there is a new boom in regional tourism driven by reaction to Melbourne's lockdowns and also the new \$200 travel voucher offered by the state government. This voucher scheme was so popular that the website crashed; the first rounds of vouchers have already been snapped up. This non-shooter tourism will dwarf the expenditure of duck shooters, and unlike the unverified guesstimates of expenditure in shooter surveys, this scheme will be audited. Those seeking the \$200 rebate must have spent two paid nights in the regions and \$400 overall.

In July 2020 Tourism Victoria included bird watching as part of its published National Visitor Survey. The report showed that **886,000 domestic tourists went bird watching in 2019²⁶ – a number which dwarfs the comparatively tiny number of hunters who participate in each duck shooting season.**

Given the monetary incentive provided to tourists by the Victorian government to travel to regional destinations between March and June 2021 it can be expected that the number of bird watchers will only increase from the 2019 figure.

If duck shooting is permitted during autumn, the presence of hunters will clash directly with tourists visiting regional Victoria specifically to observe birds in their natural habitat – not being shot out of the sky.

Many of our supporters come from regional Victoria and their views have not been reflected in the GMA advice to the Ministers. Hence, we include at Attachment C some comments from regional Victorians as provided to a survey for Regional Victorians Opposed to Duck Shooting (available on the RVOTDS website).

PART 4 – ACCOUNTABILITY

Victoria's 2020 pandemic experience has attracted far greater scrutiny of the relationship between bureaucrats and Ministers, and the importance of honest, comprehensive and scientifically accurate briefing of Ministers.

The release of GMA's 24 December 2019 advice to the Ministers sheds light on both the GMA and the quality of its advice. Its recommendation proved to be disastrously wrong, killing an estimated 60,000 core breeding stock, contributing to the dramatic decline (of 23% - almost a quarter) in game bird populations as measured by a longstanding, reputable scientific survey. The damage would

²⁶ <https://www.thecourier.com.au/story/6837543/the-big-business-of-bird-watching-is-taking-flight/> accessed 1.1.21.

have been worse but for COVID, as the GMA's advice was based on an expected kill figure of (almost) 100,000 ducks.

We are deeply disappointed that the advice to the Ministers omitted key points from our submission and the submissions of others who are opposed to recreational duck shooting. While all submissions were copied to the Ministers, there were 181 pages in the package, so it is the GMA summary that would receive the most attention in busy Ministerial offices. That gives enormous power – and an important duty to be clear and concise and accurate – to those GMA personnel who write the summary and recommendation.

In particular, it was grossly misleading to tell the Ministers that duck shooting is “a popular recreation in Victoria” when the reality (refer Fig 4 and Fig 5) is quite different. Duck shooters are a tiny and diminishing percentage of the Victorian population. Licences are so cheap that many licensed duck shooters (around half of them) do not bother to take part in the season.

The advice refers to the GMA's Waterfowl Conservation Harvest Model and glowingly but erroneously claims that “conservation and animal welfare stakeholders support the implementation of this model”. Animals Australia has serious reservations about the proposed modelling, and we are unaware of any conservation groups that have been consulted and support the model. There are many problems (such as lack of data and ignorance of waterbird life cycles and habits) and the vagaries of modelling can give rise to all sorts of spurious results. Our native ducks are in such a precarious state at present that it is no time to start experimenting with mathematical models. Even the much-lauded USA modelling for the Mallard has been unable to account for long-term challenges such as climate change²⁷. It is ironic that the GMA is embracing modelling for duck populations where we have limited data and understanding of the biology, but has never referred to climate change, for which the models are well tested, the physics is well understood, and the data has been collected extensively over many decades.

The alleged economic benefits of duck shooting were also presented to the Ministers in 2019 in a one-sided fashion. The Pegasus report commented specifically on GMA's reliance on that 2013 shooter survey²⁸:

“However, 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 (Game Management Authority, 2017, p. 4). An internal review of the 2017 opening of the duck season opening included a statement under the heading “Goals” that “duck hunting continues to contribute to the social, economic and environmental wellbeing of the state” (Game Management Authority, 2017g). The report to the Ministers on the opening weekend of the duck hunting season also claims that “regulating hunters and hunting activity contributes to sustainable recreational, social, environmental and economic benefits” (Game Management Authority, 2017f, p. 3).

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 materials that have been cited do not acknowledge the criticisms that have been made of this study or provide references to studies that present other conclusions.”

There is a clear conflict of interest between GMA staff and their mandate to promote sustainability and responsibility in game hunting in Victoria. Aside from personal involvement with shooting, many jobs at the GMA depend on the continuation of duck shooting. The Pegasus report warned that a small independent authority like the GMA risks being “captured” by those it is supposed to regulate.

²⁷ Op cit, p6.

²⁸ Op cit, p14.

The NSW Game Council was disbanded due to conflicts of interest, just as the former Coalition government was setting up the GMA.

In our view there is no independent, unbiased voice to advocate for the sustainability or humane treatment of native waterbirds. This carries risks for government as well as for the extinction of species.

ATTACHMENT A: Environmental impacts of duck shooting - an eye-witness account

“Duck shooting has been disastrous for our local wetland species. I live near a significant seasonal wetland and after years of drought, our wetland remained full for the entire year for the first time in many years during 2017. Leading up to the 2017 duck shooting season, bird life was prolific on our wetland, many species nested for the first time there in years and the season was good for them, until the shooting started. From opening weekend for three weeks solid, beginning before dawn until after dusk, our wetland was a war zone. Nesting birds such as Cormorants, Darters and Night Herons abandoned their nests and young. The week before opening, the wetland was a naturalist’s paradise. Species allowed me to pass by in my tinny with electric motor, unperturbed by my presence. A week later, gunshot scared all life that wasn’t killed, and it left the wetland. I could not get out on my boat for 3 weeks until the shooting abated and by that time, the silence was deafening. All birds had disappeared and did not return, despite the wetland remaining full of water, until 3 months or more later and then only a handful of the species returned; many did not and still have not to this day returned.

2018 duck shooting opening saw roughly 30 ducks on our wetland. A dismal number that had never recovered from the previous shooting season. Within opening day, there were no ducks on the wetland, but despite this, the shooting continued; in fact a duck shooting camp decided to shoot continuously for half an hour from their campsite after dark, after 9pm that night, across the water, directly towards a homestead. Neighbours and I called the police as we could not get in touch with the GMA after hours on a Saturday night. Local police said they did not have the resources to send anyone out that night and it wasn’t until I drove down and faced my headlights towards the water in line with their campsite across the wetland that the shooting ceased.

During both the 2017 and 2018 season, shooters have committed the crime of illegal timber removal. This act was done on a commercial scale with trailer loads of furniture slabs and old growth burls taken out of the forest. In 2018 they even had a portable mill with them to cut the slab lengths with ease. As timber removal was a serious crime performed by the shooters the season before, Parks Victoria made their presence felt on opening morning but did not return, despite phone calls to report the chainsaw and mill activity. Parks Victoria did not have the resources to return the following day when the timber removal began. The GMA and police were present on the Sunday morning of opening weekend but did not find any illegal activity. The shooters knew once the authorities left, they would not be checked upon again and this is when once more, the illegal timber removal began. Entire tree trunks were milled into commercial timber slabs.

Each season the locals here are left to pick up the pieces. Large quantities of rubbish are left at shooters’ campsites and actually in the water. In 2017 I discovered two holes which had been dug and back filled right on the water’s edge where I put my boat in, one with a plastic shopping bag full of spent shot gun cartridges and the other full of bird remains, including remains of an illegally shot Nankeen Night Heron. In 2018 there were spent cartridges left on reed stems protruding from the water, intentionally carefully placed there. The majority of the rubbish is used toilet paper, empty alcohol cans and bottles and spent cartridges. In 2017 the local kindergarten kids while attending bush kinder came across many bird remains which upset them.

Duck shooting season means that for the duration of the shooting, no one else can use the wetland - both locals and tourists stay away. Locals who use the area for birdwatching, horse riding, bushwalking and cycling cannot utilise the area for fear of being in the firing line and also the fear of running into aggressive, alcohol fuelled people with firearms and no one allows their children to utilise the area while the shooters are there. I have witnessed many times shooters in boats with gun in one hand, alcohol in the other, also shooting while boat is moving under power with motor unattended. I have witnessed Darter chicks jump out of the nest because shooters have passed too closely in boats. They nest in trees which stand in the water and the chicks were still fluffy with down, too young to leave the nest and when they hit the water they did not resurface. They drowned. I have picked up protected species floating in the water who have been shot, and recovered injured ducks many weeks later from the wetland. Governments need to protect our natural areas and giving permission to shoot our native duck species is allowing a minority group to wreak major environmental damage which affects numerous wildlife species, habitats and also community members who live in these areas."

Postscript: In 2019, the wetland was dry again. There were no ducks and no shooters.

ATTACHMENT B – Economic surveys on hunting (extract from our 2019 submission, pp13-14)

Since 2014, hunting and shooting organisations have touted the \$439 million annual benefit alleged to flow to the Victorian economy from hunting-related activities following the publication of the study commissioned by the Victorian Department of Environment and Primary Industries (DEPI) entitled "Estimating the economic impact of hunting in Victoria in 2013."

Importantly, this reported economic benefit did not consider what impact a ban on hunting and shooting would have on the recreational behaviour and spending patterns of participants.

In 2019, a new report was commissioned by the Commonwealth Department of Health (DOH) entitled "Economic and Social Impacts of Recreational Hunting and Shooting." The report was prepared by RMCg (the same consultancy who prepared the 2014 report commissioned by the DEPI) and was based on a survey of 16,576 hunters and shooters from all States and Territories.

This survey did attempt to explore how recreational time and spending would be impacted in the theoretical situation where hunting and sports shooting were both banned. The results paint a very different picture to the 2014 DEPI report.

From p4 of the 2019 DOH report:

"The gross contribution to GDP, or the economic footprint, from recreational hunting and sport shooting activity in Australia in 2018 was estimated to be \$2.4 billion, comprising \$0.8 billion directly and \$1.6 billion as a result of flow-on economic activity.

The gross contribution does not tell us the benefits of hunting and shooting for the Australian economy, or conversely, the impact on the economy of the (hypothetical) situation where hunting and shooting were prohibited. If hunting and shooting were prohibited, hunters and shooters would redirect their expenditure to other goods and services, and in many cases to similar outdoor activities such as camping, fishing, four-wheel driving and so on. The 'net' contribution to the economy, taking into account the substitution of expenditure to other activities is estimated to be \$335m, or 0.02 per cent of Australia's GDP."

It is important to note that these are national figures, covering both hunting and sports shooting – in other words, their combined incremental contribution to the national economy is only \$335 million, of which Victoria's share is a fraction of that, of which duck hunting's share will be a smaller fraction again (noting that the 2014 DEPI report suggested (p25) that expenditure on duck hunting trips contributed less than 20% of the total expenditure on hunting trips in Victoria).

The findings of the 2019 report also address the supposed health and social benefits attributable to hunting and sports shooting – finding that the vast majority of hunters would still continue to be active, enjoying outdoor activities such as hiking, camping and four-wheel driving even if hunting were banned.

ATTACHMENT C – Does duck shooting have costs or just benefits?

Animals Australia has many supporters in regional Victoria who are opposed to duck shooting. We have not collated their views but the site <https://www.regionalvictoriansotds.com/videos> shows many rural residents speaking frankly about the losses they experience every duck shooting season:

- Tourism and duck shooting don't mix
- Tourists stay away because the shooting is "scary"
- The shooting starts before daybreak and the noise goes all day
- The noise disrupts the daytime sleep of children and shift workers
- Duck shooting means local tourism businesses can't expand because they can't operate during the 3-month shooting season
- Some duck shooters shoot at anything, e.g. swans, baby birds
- Children are terrified and upset by duck shooting
- Horses and dogs are terrified and have gone through fences because of it
- Duck shooters leave their faeces and litter all around the wetlands
- Campfires are left burning
- They destroy trees and illegally remove timber in their utes
- They shoot too close to homes and roads
- People are afraid to speak out because they fear retribution from shooters
- Trespassing is a problem and landowners feel intimidated by shooters

The 2020 duck shooting season must be cancelled, on the current compelling environmental grounds and submissions made above.

Please contact me if further clarification is required.

Yours sincerely,



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