

# Sporting Shooters Association of Australia (Victoria)

*A fair go for responsible people.*



Game Management Authority  
Level 2, 535 Bourke Street  
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## 2021 DUCK SEASON SUBMISSION

SSAA Victoria strongly supports the proclamation of a full length duck season in 2021 with a ten bird per day bag limit. The Association also considers that up to two Blue-winged Shoveler should be incorporated into the bag.

SSAA Victoria represents the interests of its 40,000 members on hunting related matters. The Association has a long and proud history of supporting ethical hunting and the sustainable use of Victoria's game resources.

Hunting, including duck hunting, is a legal and legitimate activity carried out by tens of thousands of Victorians. It is recognised by the Victorian Government as such and is also recognised as injecting hundreds of millions of dollars annually into the Victorian economy.

The Association considers it is important to note that the *Wildlife (Game) Regulations 2012* provide for an annual duck season and a ten bird daily bag limit. The *Wildlife Act 1975* enables the responsible Minister to vary those arrangements, including in response to extreme environmental circumstances.

It is the view of SSAA Victoria that potential changes should not be routinely canvassed before every season. The regulated position should be the default position. Changes to duck season arrangements should only ever be **considered** in exceptional circumstances. An objective benchmark should be established to clearly articulate what those exceptional circumstances are and at what level they trigger a review.

Where the Association considers a regular season would pose a potentially realistic threat to the sustainability of Victoria's duck populations it will encourage the adoption of a modified or cancelled season. SSAA Victoria has taken that approach in the past and recommended modifications when appropriate. That is because the Association is genuinely committed to ensuring the sustainability of the resource. While always concerned with the current season, hunters want to be able to hunt ducks in Victoria in perpetuity. The Association is not aware of any submissions raised by anti duck hunting groups that concede a normal season should occur under any circumstances.

All game species seasons in Victoria are legislated, yet the duck season is the only one that undergoes a process of annual submissions and Ministerial review. Why is this the case? There are elements of society that are ideologically opposed to hunting and their vocal opposition seems to have been effective in creating the current season-setting system that creates conflict and uncertainty. The Association considers the current system to be detrimental to good game management outcomes.

Based upon the information provided by GMA under its *Considerations for the 2021 duck season (provided on 18 December 2020)*, the Association submits that no evidence has been provided in that document to indicate that any exceptional circumstances currently exist. Therefore, no changes to the season arrangements are necessary. There has been significant rainfall across most of Eastern Australia throughout Winter, Spring and into Summer in many areas. The Eastern states are experiencing a La Nina weather pattern, water storages have improved significantly and stream flows have also improved from last year. SSAA Victoria would therefore expect the declaration of a full season and bag limit, as per legislation, for the 2021 season.

GMA recognises that Victoria's game ducks are highly resilient to harvesting and have strong powers of recovery in response to harvesting and favourable environmental conditions. While weather patterns and rainfall totals have varied across the State, and eastern Australia more generally, the widespread rainfall received over the last six months has resulted in significant areas of habitat being available for ducks and created favourable conditions. Additional heavy falls in Eastern Australia have occurred since the considerations were provided and significant rainfall totals across the state have been received in the last week. Birds are dispersed over wide areas, meaning that overall hunting pressure will also be dispersed. That situation reduces any risk of negative impacts that could potentially occur if a significant proportion of the State's duck populations were concentrated in small areas and subject to intense hunting pressure.

Duck hunting does not occur in Queensland and only occurs in NSW as pest mitigation for the protection of agricultural assets. Additionally, many wetlands in Victoria are not available for hunting. In effect, the majority of Eastern Australia is a duck sanctuary. Nomadic species will be present in Victoria if conditions are favourable. Core breeding populations are effectively protected by this nomadic nature. Sedentary species face potentially greater risk when concentrated on limited water bodies that receive high hunting pressure. Current conditions see ducks dispersed throughout eastern Australia and throughout Victoria. Risk to breeding populations from hunting pressure is negligible.

Reports from members across the state are that ducks are being observed breeding in all areas. One of the major limitations of the Eastern Australia Aerial Waterbird Survey (EAAWS) is that it does not effectively identify breeding ducks. Ducks do not congregate in the large and obvious breeding colonies like many of the larger waterbirds do. They will not be seen to be breeding from a plane flying a transect. Emphasis placed on the overall waterbird breeding indices of the EAAWS is inappropriate for the consideration of a Victorian duck season.

Due to Covid-19 restrictions placed upon hunters during the highly modified 2020 season, very little hunting occurred. The estimated take of 60,400 birds meant, for all intents and purposes, that the 2020 season did not eventuate and duck populations were not materially impacted. Young birds that would have been harvested have survived and will be breeding under the current favourable conditions. Predictions of a La Nina weather pattern raise the

likelihood of above average rainfall until Autumn. Therefore, the favourable conditions for game ducks are forecast to be sustained over summer, leading to an increasing duck population. With such widespread rainfall those birds are also likely to remain dispersed.

The Association recognises that duck populations in Victoria are significantly influenced by environmental conditions throughout all of Eastern Australia. The EAAWS does provide a long-term reference that can be useful in understanding trends in habitat availability and waterbird abundance across this area. However, excessive emphasis should not be placed on the EAAWS when considering the Victorian duck season. While providing a long-term comparison, it is not an appropriate tool to use to predict game duck populations in Victoria during the hunting season. That is not its purpose.

For example, the EAAWS indicated extremely low duck numbers prior to the 2017 season. This contrasted significantly with Victorian ground counts, which indicated that duck numbers were, in fact, very high. The GMA report, *Estimates of harvest for duck and Stubble Quail in Victoria 2017*, confirms that it was a very good duck season, with the estimated take above the long term average. Those results confirm the validity of the ground counts and highlight the limitations of the EAAWS.

SSAA Victoria supports more extensive research into wild duck populations and habitats being undertaken. The Association is pleased to acknowledge the pilot aerial survey carried out in November and the move towards the implementation of an Adaptive Harvest Model. It awaits the results of the trial with interest, but again urges caution in the interpretation of the data until the effectiveness and accuracy of the methodology is verified.

The Association would also encourage government to consider the positive economic impact which the duck hunting season has, particularly in regional areas. In 2013, duck hunting contributed \$111.7 million to the Victorian economy. That result was with a full season and bag limit. In comparison, 2019 saw duck hunters inject \$63.6 million into the Victorian economy. While still an impressive figure, it is a large drop from 2013. There were very similar numbers of licensed hunters in each year, 24,036 in 2013 and 24,925 in 2019. The major difference was that 2019 was a significantly modified season. The season ran for just 65 days with an opening weekend bag limit of four birds per day, then five birds per day for the rest of the season. No Blue-winged Shoveler were allowed to be taken.

The reality is that the average hunter bag is well below the specified legal bag limit. Very few hunters actually fill their bags, though the designated bag limit each year does have a significant impact on hunter participation. Reduced seasons and bag limits discourage hunter participation. Reduced hunter participation reduces the economic input into the Victorian economy. The example of the comparison between the 2013 and 2019 spend by duck hunters clearly shows the economic cost of discouraging participation.

Covid-19 has had a devastating impact on the Victorian economy. East Gippsland also suffered the huge impact of last summer's bushfires. It is essential that every effort is made to encourage spending to support the area's recovery, and in regional areas more broadly. A standard season for 2021, which poses no threat to the sustainability of Victoria's duck species, is a simple and effective way to encourage that spending.

Ministerial power exists to modify duck season arrangements and it has been used extensively over the last 20 years. The Association strongly encourages the Minister's power be used to make changes to further protect hunters from harassment and intimidation by

activists. A late start to shooting times over the opening weekend has been trialled in recent seasons. It has meant that hunters have less shooting time before activists are allowed to enter wetlands, as well as taking away some of the most productive hunting time. Illegal activist activity also continues to occur where activists enter wetlands before they are permitted. SSAA Victoria expects hunters to obey the law and hunt in an ethical and sustainable manner. It also expects that activists are held to the same legal standards and also obey the law.

The Association understands the rationale behind the trial of later of seasonal start times. However, has clear evidence been found to show that the measure has in any way reduced illegal activity? If not, why would it be continued? Hunting is allowed from half an hour before sunrise until half an hour after sunset for the remainder of the season. SSAA Victoria requests that the later opening start time trial results be released and the concept re-examined. If there is measurable evidence to demonstrate that the trial has been successful and later start times should remain, then modifications should be made to the restricted hours for activists.

The BOM Climate Driver Update, issued 22 December 2020, states that nationally averaged rainfall for December 2020 is likely to be in the ten wettest on record while climate outlook for January to March 2021 indicate rainfall is likely to be above average for most of the eastern third of the country.

These forecasts promise even more favourable conditions, to which duck populations are known to respond positively. Additionally, ground observations already show large numbers of ducks breeding and widely dispersed throughout Victoria.

Sightings of Blue-winged Shoveler have also increased over the past few years and the reinstatement of a limited number of that species to the bag is also recommended.

In conclusion, SSAA Victoria strongly supports the proclamation of a full duck season in 2021. That position is based largely on the GMA's own *Considerations* paper, which indicates that there are no compelling reasons *not* to have a full season and bag limit. Seasonal conditions are good and are forecast to stay that way. There is no evidence to suggest that a full season and bag limit for 2021 would threaten the sustainability of Victoria's duck populations. The proven economic stimulus which a full duck season will bring to regional areas is also particularly relevant in the current circumstances.

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