



The proposed Kingsford-Klaassen Model (“the Model”)

Thank you for the opportunity to make this submission.

Regional Victorians Opposed to Duck Shooting Inc (RVOTDS) is a not for profit association that incorporated in 2018 and now has over 5000 supporters. It is the only stakeholder that speaks first-hand for the long-suffering regional residents for whom one quarter of each year is well-nigh intolerable, with gunshot blasting our ears, frightening our families and detracting from our businesses. In the absence of government public consultation or social/economic impact studies on anyone other than a small group of hunters, we are able to offer a balance to what appears a one-sided push by the hunting lobby, regarding the [impacts of hunting](#).

One in every four Victorians lives outside Melbourne with an increasing number of metro visitors to our regions, which makes it even more startling there has never been any public consultation, no 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 ducks. Residents and unsuspecting visitors to the regions, are subjected to unmonitored gunfire from before daylight at tens of thousands of public waterways around the state – so many that no government department has been able to estimate their number.

Frankly, we are appalled that government continues to blindly invest precious taxpayer funds into the killing of declining wildlife and the destruction of Victorians’ right to “quiet enjoyment” of our properties and public amenity. The AHM appears another example of pandering to a minority hunting lobby which appears to be clutching at straws – at taxpayer expense – to continue its “recreation” while overwhelming evidence suggests it’s time it stopped.

1. “Taking the politics out of duck shooting”

Shooters have long campaigned for Adaptive Harvest Management (AHM) – the use of computer models – to support their “recreation” of wounding and killing native waterbirds. It appears they have persuaded government that AHM would “take the politics” out of duck shooting. Nothing could be further from the truth.

Consider climate modelling – something that GMA and shooters consistently ignore. All climate models point to further warming and long-term drying consequences for eastern Australia, especially south-eastern Australia, contributing to serious decline of game duck species. But despite good understanding of the physics, and long-running data collections worldwide, climate modelling remains contentious. Compare that with duck modelling, for which we have little understanding of duck behaviour and even less data that is reliable and long-term. Why the push towards AHM?

All models are subject to assumptions and uncertainty. There is ample scope to change the outcome by tweaking the factors involved. The question-time following Prof Klaassen’s recent presentation illustrated that point: shooters want to adjust the “Threshold” number to get more “full seasons” and a higher average for bag size.

The voting public is becoming increasingly savvy about modelling. COVID-19 modelling is the latest example of how predictions will vary depending on all sorts of assumptions and variables under consideration. Voters will not be fooled by those who wish to hide behind a new “Model” to defend the unpopular, uneconomic and cruel practice of duck shooting. We note that the current proposal

is aimed at “*enhancing public confidence in regulatory performance in setting arrangements for the annual duck hunting season.*” Perhaps it’s time the public, not just hunters, were listened to.

2. Public confidence? GMA’s misuse of experimental science with diminishing duck populations

In 2021 we witnessed a government backflip on bag size, from 2 to 5, based on an experimental helicopter survey conducted by ARI. Even then the shooters were not happy, complaining noisily in the regional media, demanding a longer season based on this very limited pilot study that should not have been used at all to determine season settings. GMA lost credibility by grasping at this new “estimate” of duck populations in Victoria, supported by an “independent “ assessment by someone who was not even a mathematician.

- The Victorian parliament recently released some 1,600 pages of GMA documents in two volumes and we shall refer to these to support our comments in this submission¹. There is clear evidence of friction between the ARI scientists and the GMA Board Chairman who was keen to get results from the helicopter survey before briefing the Minister (A624-626), despite serious data problems besetting the scientists.

Shooters seem to like to prey on quantitative reports and use figures out of context, to their advantage. Unfortunately, GMA and the Minister do not seem interested in correcting these misleading statements. A well-known example is the 2013 Victorian hunting survey report, which clearly stated that it was not a cost-benefit study and should not be used to choose one option (e.g. hunting) over another (including doing nothing).² However:

- GMA regularly briefed its Minister about the supposed economic value of hunting, and compliant MPs also spread that message.
- The small print showed the shooter expenditure was mostly for food, drink, and vehicles – all of which would be purchased regardless of shooting ducks.
- Later surveys acknowledged the “net” contribution of duck shooting was minimal as expenditure would flow elsewhere if the season was banned.
- GMA has ignored repeated requests from RVOTDS to study the negative social and economic impacts of duck shooting on regional residents and their businesses, despite this being required under the GMA Act (s6(h) and s8A(b)).

With this history, we have little confidence that the GMA will provide an unbiased approach to AHM or work to correct misleading claims by shooters based on selective quotations, taken out of context, from taxpayer-funded reports on AHM. Our game duck populations are in long-term decline. This is no time to “experiment” with season settings for killing them.

¹ The GMA documents released by the parliament this year can be accessed here: <https://www.parliament.vic.gov.au/assembly/tabled-documents/search-tabled-documents-database/details/3/10630> For reference in this submission, Volume A, page 20 would be shown as A20.

² *Estimating the economic impact of hunting in Victoria in 2013*, DEPI, page 14 (section 4.1) https://www.gma.vic.gov.au/_data/assets/pdf_file/0010/481717/Estimating-the-economic.pdf

3. Taxpayer politics

The Kingsford-Klaassen paper traces Victoria's many efforts to work on AHM since 2010. These include three (contradictory) reports by panels of scientists (2010, 2017 and 2019) as well as the ARI helicopter survey. A key element missing is the cost to the taxpayer of these efforts to date, and the projected cost to the taxpayer of all the proposed "research" that would be required to feed into a future AHM model. And why are taxpayers being asked to fund this? To help justify one particular minority, male-dominated recreational choice for less than two in every thousand people, most of whom have alternative options for recreation³.

Almost half our duck licence holders are "inactive" – meaning they don't participate in the season. So, all this effort and taxpayer expense is to placate about 12,000 Victorian men. There are 6.5m other Victorians whose welfare and hobbies seem largely ignored by government.

AHM is an import from America, home of gun culture and gun tragedies. AHM has not been used successfully anywhere for declining species such as Australia's game ducks.

COVID-19 has caused a major re-think of many government policies at both state and federal level. It has also caused a major re-think in many Australian homes, clarifying what really matters in life. The COP26 conference in Glasgow is highlighting climate change. The Black Summer of 2019-20 focused attention on wildlife losses and extinction risks. Local travel is more popular now and respect and appreciation for Australian wildlife has increased. It is time to re-think the political commitment to AHM and duck shooting:

- If an independent poll was taken, asking voters whether millions of taxpayer dollars and top scientific minds should be devoted to the hobby of 12,000 men or to the protection of vulnerable wildlife, how do you think they would answer? Departments and Ministerial staffers should seriously reconsider before advising government to push ahead with AHM.
- Using GMA duck licence statistics, collated from postcodes into electorates, it is clear that duck shooters are only a tiny percentage in all but a handful of electorates (the exceptions are safe Coalition seats). Shooters threaten MPs that not only the duck shooter but also "his sisters and his cousins and his aunts"⁴ will punish any government that bans duck shooting, but that is an insult to the intelligence of non-shooters. Far more voters are concerned with issues of environmental destruction, animal cruelty and risks to public safety.
- AHM is all about applying maths to future duck slaughter seasons. But maths can illuminate other aspects of duck shooting too. Our understanding is that around 35,000 waterways are legally available for duck shooting - far more waterways than are needed by 12,000 men for their annual "recreation" of shooting birds. It's time to give back public waterways to the declining wildlife which need them, the rate-paying residents with a legal right to enjoy their

³ *Economic contribution of recreational hunting in Victoria, 2019*, DJPR, page 18
https://djpr.vic.gov.au/_data/assets/pdf_file/0008/1948706/v.4Economic-contribution-of-recreational-hunting-in-Victoria-accessible.pdf.

⁴ A famous line from the Gilbert and Sullivan play HMS Pinafore.

properties nearby, and the ever growing numbers of visitors to Victorian regions wanting to enjoy nature in peace. [\(Please pass this comment to the review of hunting regulations\)](#)

- It's also time [\(please pass this also to the review of the hunting regulations\)](#) that shooters should lodge an application for a permit (as for hunting trips in NSW) and pay an event fee to Councils like any other event organiser or recreational club is required to do. As part of the permit, there should be risk assessment and conditions re noise pollution, rubbish collection and toilets. These suggestions are not far-fetched, given that DJPR/GMA was considering whether duck shooting is a "public event" and subject to particular COVID requirements (A387).

4. Lack of data

Shooters try to discredit the Eastern Australia Waterbird Survey (EAWS) conducted for the last four decades by Prof Richard Kingsford and his team (UNSW). If the EAWS was showing prolific duck populations, we are confident that shooters would accept it. But as the EAWS is showing the unambiguous long-term decline of game duck species, shooters are looking elsewhere for comfort.

The only other long-running data set⁵ is the Summer Waterbird Count (SWC) now rebadged as the Priority Waterbird Count (PWC), conducted since 1987 by a mixture of departmental staff and "volunteers" – mainly shooters. The SWC was commenced after scientists at ARI grew concerned that the annual shooting season was taking too great a toll on duck populations, so a pre-season count over a large number of wetlands was introduced to gain an idea of the capacity of species to withstand the losses of the killing season.

However, government resources were restricted over time, and the number of wetlands surveyed declined considerably, from a peak of 786 (1991) to 126 (2015)⁶. The emphasis was changed more recently to focus on "priority" wetlands. As there is no obvious consistency in the coverage of the state's wetlands, this series of counts appears to be 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? There was no WIT test until 1991. 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 abundance data in the Model is EAWS data, with the exception of the dubious SWC (PWC) counts. Then the Model introduces satellite data for surface water area in key regions of Victoria, Lake Eyre Basin and Murray-Darling Basin. This satellite data was so poor in the 1980s that it could not be used, so we question how good it was in the 1990s. However, the concept of including surface water area as a variable seems relevant to duck sustainability. (Huge dams should be excluded.)

⁵ Melbourne Water also records waterbird populations at its Water Treatment Plant, but these increase in times of drought because birds use the WTP as a refuge.

⁶ Excluding the COVID year of 2020.

There is an old and somewhat crude saying: “You can’t make a silk purse out of a sow’s ear.” Given our very limited data sources, it is unrealistic to expect that AHM can be relied on to predict season settings, if we are genuinely concerned about “sustainability and responsibility in game hunting in Victoria” (s5 of GMA Act).

5. The Kingsford-Klaassen Model

Specific concerns include:

- We oppose the proposed decision date of 1 December. Making season decisions before experiencing any of summer’s impact is contrary to sustainability and seems only designed to address shooters’ preference for an early decision so they can plan their holidays. This goes against s8A(d) of the GMA Act which requires decisions to be based on the best evidence.
- The whole concept is flawed: trying to copy the pattern of past decisions and project this approach into the future. Past duck season decisions have contributed to the long-term decline of game duck populations. If we plan to arrest this decline and start to restore populations, we need to change the approach.
 - We note the Model would have produced only 4 cancellations over the last 30 years, the same number as in real life (two were for different years). This is not progress.
 - Shooters were complaining after the presentation that the average bag limit using the Model was slightly less than in the last 30 years.
 - Decision-making over the past 30 years has been influenced by politics and conflicts of interest. Sustainability has been a very minor consideration.
- We oppose the apparent intention to adjust bag limits but not season length, particularly when most shooters’ bags are not checked. We note Klaassens’ comment that a modest change to season length has little effect because shooters adjust the dates of their participation to achieve the same outcome. However, when governments lack the courage to cancel a season, a drastic cut to season length remains an important tool to reduce the carnage to birdlife and disruption to residents. The noise of the shooting is like a war zone, terrifying children and animals, preventing sleep, interrupting those working from home and deterring visitors who bring much more to the regional economy than duck shooters do. Given that a modest reduction in season length has been shown to make little difference to shooter participation, we recommend that the maximum season length be reduced from the current 12+ weeks. [Please pass this comment and rationale to the review of hunting regulations.](#) In fact, until the government listens to voters and bans duck shooting completely, the 0.2% of the population who shoot ducks should be given no more than 0.2% of the year to do so.

“Those who oppose or who are negatively impacted by duck hunting would benefit from the reduced harvest and season length. The reduced season length would reduce the impact on

amenity and competition for the use of public lands where hunting occurs. The economic impact of these factors is not known.” – GMA Briefing to Minister, 25.1.2021 (A6)

- Particularly in the absence of risk assessments or the ability to monitor what birdlife is present let alone shot during the season, the *number of locations* available to shooters should also be reduced to no more than 0.2% of public waterways. There is no need for 12,000 men to be able to shoot at 35,000 public waterways. The number should be restricted to those areas which have been risk assessed for public safety, and which can be monitored for what birdlife is present prior to shooting, together with what is shot during the season. This would provide valuable evidence and data, as opposed to continuing the guesswork while our bird numbers sink.
- We do not believe that the SWC or PWC is a suitable data set for inclusion in the Model, for the reasons explained above.
- The Model is not a good fit to the data. Table 1 on page 9 shows it explains as little as 38 per cent of the variation in the SWC/PWC counts; 41 per cent of the variation in the EAWS counts (NSW); and 52 per cent of the variation in EAWS counts (VIC).
- The Model sets Threshold values – essentially a minimum for each measure of “abundance” - to guarantee a full shooting season. For example, for EAWS counts in Victoria (Bands 1-3), this Threshold is set at 60,000. Shooters are already pushing to have Thresholds lowered so that a full season would be sanctioned more often. This is contrary to sustainability and any attempt to reverse the long-term decline of species. The Thresholds should be higher, not lower!
- The abundance measures are then scaled back to produce indices, so that when abundance is at the Threshold value, the index is equal to one.⁷ Hence an index value of one equates to a full season. However, someone has decided that an index will support a full season as soon as it exceeds 0.9. What shooter-friendly influence was exerted here? This part of the Model is known as the aPS (“aggregated points scale”) and it should be adjusted so that 0.9 is replaced by 1.0.
- Because the data is so limited, the Model cannot account for individual species, most of which are in long-term decline and require special consideration each year. For example, in its January 2021 submission to GMA, Birdlife Australia pointed to the current scarcity of Blue-winged Shoveler, Hardhead and Pink-eared Duck. (Only the Shoveler was spared in the 2021 decision.)
- This Model should not be presented or accepted without transparent, publicly available costings. It appears to be part of a network of GMA-inspired “research” designed to counter growing community concern about the cruelty of wounding and the unsustainability of shooting seasons in an era of climate change.

6. Are there any positives?

⁷ The final decision is based on a combination of index values for the various measures of abundance.

The Model appears to have shown that duck abundance depends in part on water surface area – not a surprising result. Rather than delegating duck season decisions to an automated Model, we suggest that GMA modify the collection of information included in its “Considerations” document each year.

- RVOTDS has previously requested (without success⁸) that game duck species data be provided by EAWS Band. We need time series data for EAWS abundances in the geographical areas utilised in the Model.
- We also need to know the surface water area for Murray-Darling (MDB), Lake Eyre Basin (LEB), Victoria and NSW – presented in time series graphs so we can assess trends.

The Model also appears to have potential as a check on grossly unreasonable decisions. For example, it correctly identified the 2017 decision as an outlier. It was scandalous that GMA sanctioned a full three-month duck shooting season starting March 2017 when the EAWS abundance had hit a record low in Oct 2016. It does not “enhance public confidence” to know that the same people are in charge at GMA today.

Conclusion

It is little wonder that there is a Parliamentary Inquiry into Victoria’s ecosystem decline, when government appears to continually pander blindly to industry groups like the hunting lobby.

The hunting lobby appears to be clearly clutching at straws – at taxpayer expense – to source new “data” which will support its minority choice of recreation, because existing science does not.

It’s not just about our native birdlife.

For a state which likes to pride itself on “keeping Victorians safe”, it appears a gross oversight that despite one in four Victorians living in regional areas, and more domestic tourists interested in nature based activities in our regions, that no public consultation nor risk assessment has occurred as to the impacts of duck shooting at so many waterways authorities can’t estimate their number.

Until appropriate and responsible change is adopted by government, we resolve to continue to expose the diversion of scarce public funding away from conservation of our declining native wildlife and respect for human rights, and towards the personal satisfaction of the few who enjoy wildlife slaughter.

Regional Victorians Opposed to Duck Shooting inc.

www.regionalvictoriansOTDS.com

Attached: Regional comments.

⁸ Refer A1213