

## Submission to Game Management Authority re Native Duck & Quail Shooting 2022

By Regional Victorians Opposed to Duck Shooting Inc, supported by our key alliance partners

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**Regional Victorians Opposed to Duck Shooting Inc (RVOTDS) is calling for the 2022 native duck and quail shooting seasons to be completely closed based on dire environmental factors, significant long-term decline of all waterbird indices, lack of critical data concerning Stubble Quail and protected species, and a severe lack of social/economic impact studies (on anyone other than hunters.)**

### Introduction

The GMA Act states that it is a function of the GMA to:

- S6 (g): promote sustainability in game hunting and
- S6 (i) to make recommendations to relevant Ministers in relation to - iii) declaring public land open or closed to game hunting, open and closed seasons.

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

However, the GMA has not once closed a duck or quail shooting season despite presiding over some of the worst environmental conditions ever recorded. Previous governments cancelled duck shooting seasons in 2003, 2007 and 2008 for less dire circumstances.

In addition, S6(h) states it is a function of GMA to monitor, conduct research and analyse the environmental, social and economic impacts of game hunting. Further, S8A requires the GMA to have regard to (b) the principle of triple bottom line assessment, which means an assessment of all the economic, social, and environmental costs and benefits, taking into account externalities and (e) the principle of stakeholder engagement and community participation, which means taking into account the interests of stakeholders and members of the local community in implementing appropriate processes for stakeholder engagement.

RVOTDS, a not for profit incorporated association with over 5500 supporters, represents those who live and work around regional waterways, adversely impacted by duck shooting. In all of our submissions and communications to GMA we have provided significant evidence of adverse social / economic impacts to families, farmers and businesses. We do so again in this submission.

It should be noted that one in four Victorians now live in regional areas. It should also be noted that no government department has been able to estimate the number of thousands of public waterways open to unmonitored duck shooters, let alone signpost them or monitor hunters' compliance at more than a tiny percentage of them.

Finally, it should be noted that no risk assessments, no desk top studies, no consultations with nearby communities, have ever been conducted (other than at two wetlands in Mildura in 2019 which were subsequently closed to shooting for safety reasons). This would indicate that the information we provide to GMA regarding the impacts of hunting, would be of keen interest to GMA in order to fulfill their obligations under the Act.

The sheer number of public lakes, streams, rivers, creeks, wetlands and waterways where duck shooting is allowed, obviously means there is a gross lack of monitoring of bird species which may or may not be present, as well as a lack of monitoring of what is being shot. This poses a significant risk not just to the public, but to our dwindling native waterbird populations including threatened species.

**Quail.** Given its obligations under the Act, but even just considering sustainability generally, it is surprising GMA have never considered consultation and information pertaining to quail shooting seasons. This is our second submission to GMA outlining reasons why recreational native quail shooting should be cancelled in Victoria, same as it has been in other states, including South Australia (due to concerns for sustainability and lack of population data.)

**This Submission outlines the best available evidence of environmental factors and social/economic impacts of bird shooting to Victorian communities.**

**It is based on this evidence, we re-iterate, GMA must exercise its obligation to recommend duck and quail shooting season **losures.****

**Restricted seasons are not a solution. In restricted seasons there are still significant adverse impacts to community and thousands of our dwindling numbers of native birds including threatened species killed and maimed.**

*Please note the following submission includes links at the end to Attachments A, B and C.*

## Ongoing shooting of native birds – an example of Victoria’s failing

Australia is the worst in the developed world for species extinction and Victoria has the highest number of threatened species by sub region on the country.

Without doubt, the most robust, long-term dataset available regarding the health of waterbird populations, is the annual East Australian Waterbird Survey covering over a third of our continent, by the Centre for Ecosystem Science, University of NSW. This long term data tells us Australia’s native waterbird numbers have declined up to 90% in just the last four decades.

Worsening effects of climate change will stress them further. *“We’re going to see long term declines exacerbated”* (Head of Ecosystem Science, University NSW).

Hunting remnant populations, particularly when there is little breeding activity, is not sustainable.

## Why did a shooting season occur in 2021 when the best evidence showed it should not?

It is unclear why a shooting season was allowed to proceed at all in 2021 given the 1600 pages of documents regarding the 2021 duck season tabled in Parliament last year, showed:

- The Head of Biodiversity at the Environment Department (DELWP) recommended further shooting restrictions, if not outright cancellation of the shooting season.
- Total game duck abundance was well below long-term average and declined from the previous year despite better rain.
- Breeding continued to be suppressed for a fourth consecutive year.
- South Australia protected three of the game duck species: Blue-Winged Shoveler, Hardhead and Pink-eared Duck, due to low abundance. But Victoria dismissed advice from DELWP that the Hardhead met criteria for threatened species status and ignored evidence that the Pink-eared Duck had suffered serious decline in recent years.
- Game bird numbers in NSW were less than half what they were five years ago.
- In SA, the numbers of “game” ducks were only 25% of the long -term average, a 28% decline from the previous year.
- In Victoria, GMA’s ground count of “game” ducks showed an 80% reduction from the previous year.

The tabled documents also showed other concerning issues:

- Hunt clubs recommended a full shoot, irrespective of the damning science and of the fact they recommended a restricted shoot the previous year when bird numbers were higher. This obviously poses serious concerns about their regard for evidence or conservation.
- GMA’s initial proposed timeline for consideration of stakeholder submissions was less than three business days, suggesting a pre-determined outcome.
- GMA’s recommendation to Ministers appears to have been delayed as its Chair (a long time holder of a duck shooting licence himself according to documents obtained via FOI) attempted to obtain the results of the trial helicopter data.
- Leading scientists at DELWP advised against the use of this untested helicopter data due to its unreliability. In spite of this, and the clear evidence of the shocking decline in our waterbird indices, helicopter data was used to more than double the kill rate just months later. (RVOTDS have requested more information via FOI on this – the information was due to be released to us in November 2021. We are still waiting for this and have escalated the matter as a complaint to the Office of The Victorian Information Commissioner.)

# Letters

## Hunting makes no sense this season

WE cannot easily reverse a warming climate, or avoid the likelihood of more frequent and longer droughts and fire seasons. What we can change with the stroke of a pen, are the additional man-made threats such as recreational bird shooting, or we will have to take responsibility for aiding and hastening a catastrophic downturn of waterbird species.

It is often falsely believed that birds will simply "bounce back" — there are biological limits to this bouncing back because of the limited opportunities and options that birds have themselves.

Moreover, many successful breeding pairs will have become victims of past fire and drought catastrophes themselves and inexperienced birds may not have had time to acquire partners. Bearing in mind, that at the best of times only 25 per cent of any avian species ever breeds in a given year, it is predictable that the number of breeding events will decline this year.

It can thus be expected that breeding success of the surviving birds will diminish, even if conditions should remain reasonably good.

It is scandalous to allow any shooting season this year and it is particularly puzzling that the shooting season of waterfowl allows, tolerates or turns a



blind eye to the shooting even of vulnerable and endangered species.

Native birds have a role to play in maintaining a healthy Australian ecosystem, healthy waterways and in control of pests. I would like to see shooters shoot clay pigeons as accomplished sportsmen and women, not as self-appointed executioners of native wildlife.

**Gisela Kaplan,  
Prof. of Animal  
Behaviour, PhD (Vet.Sc)**

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This article by Prof. G. Kaplan – a highly regarded bird expert whom GMA have surprisingly never consulted – we believe expressed matters eloquently.

**Since last year's submission process, all waterbird indices have declined further.**

**GAME BIRDS FALL BY MORE THAN HALF ON LAST YEAR –  
NOW JUST 25% OF LONG TERM AVERAGE**

The results of the latest (39th) EAAWS *now* show:

- **48% of wetlands surveyed had no birds.**
- **Waterbirds are 41% down on 2019 (a year of record drought).**
- **“Game” ducks are down by more than half (58%) on last year and are at just 25% of the long term average.**
- **Breeding is still well below long term average and ibis (non-game) are responsible for most (83%) of it.**
- **All major indices show significant long term declines.**
- **All the above, is despite record rains.**

We wonder if these shocking statistics will make it into the "key points" of GMA's recommendation to Ministers this time.

GMA have often said, and on page 2 of the EAAWS report it states in point 5, "*Long term trends are more informative for predicting population status than year to year fluctuations*". The graph of NSW Riverina data does not show a long-term trend. It only goes back as far as 2015, so it masks the fact that in 2016 game ducks were at their lowest abundance in four decades of EAAWS surveys. Shooters speak of a recent “explosion” of ducks in the Riverina but a recovery to (almost) 2016 levels is still a very poor result.

But no doubt shooters will be pushing results of their second ever helicopter survey instead of long term data, in the hope the picture may look better to justify their recreational bird shoot. Will GMA be considering the “best available” evidence as is required of them in the GMA Act S8A(d) or will they once again buckle to shooters whims at the detriment of our dwindling native bird populations and rural communities?

GMA chose not to alert stakeholders to the only substantial peer review of the first helicopter survey, completed by Professor Kingsford and Dr Prowse in late September 2021. Their review is quite technical but (after consulting a maths expert) we understand that it raises serious concerns about the accuracy of the results from the helicopter survey. A number of concerns were raised that would lead to over-estimates. As these criticisms were published shortly before the second helicopter survey, we assume that the same significant shortcomings continued into the second helicopter survey.

**Castlemaine Field Naturalists Club (CFNC) have assisted with this submission by contributing the following comments.**

CFNC is strongly opposed to duck hunting, but we acknowledge that the current request from the GMA is not concerned with the policy but seeks comments on whether the 2022 season limits on duck numbers should be higher, lower or the same as for 2021.

Daniel Taneski (GMA) in his email to stakeholders on 25th November 2021 wrote: “Each year, Victorian Government agencies monitor a number of environmental and population *variables to ensure duck hunting remains sustainable in Victoria*” [our emphasis in italics]. We strongly believe that in the interests of having a ‘sustainable’ hunting season that the 2022 hunting season be curtailed to not just less than the 2021 hunting season but cancelled altogether.

Looking at the figures in the various reports:

- All game species show either no-change or a decline since 2020.
- All species are well below their peak levels (10%-15% of peak) which mainly occurred at the start of the data collection in the 1980s
- Most of western and northern Victoria has missed the extra rainfall experienced along the eastern seaboard.
- Most of Victoria has an ongoing soil moisture deficit meaning that run-off will not be filling wetlands and dams outside the mountainous areas and not creating breeding habitat.

All figures point to an on-going decline in duck abundance and habitat, the current ‘wet’ year an aberration.

- Page 38 of the ‘Considerations for the 2020 Duck Season’ describes how season 2020 was reduced because of low game duck numbers.
- The data show that 2021 numbers are generally less than 2020.

Any hunting is relying on the breeding of birds in other parts of the continent with Victoria being a population sink. This is not sustainable!

- The NSW Riverina is outside Victoria. Band 2 wetlands with maximum breeding are outside Victoria. This region should not be part of the calculations
- Nor is it morally acceptable for Victorian hunters to rely on birds that have bred in other States (NSW, ACT, Queensland) that have banned duck hunting.
- Further, in relying on the NSW Riverina for breeding the GMA figures include Plumed Whistling Duck (not a game species). **PWDs were the only species to show a year-on-year increase in the Kingsford report so should be removed from any calculations involving the NSW Riverina.**
- There seems to be reliance on the breeding of non-game species to make up the numbers.
- The summary of the ‘considerations’ report points to the need for a further reduced or no hunting season in 2022. Despite a predicted La Nina, the impact on breeding will be too late to justify a full shooting season.

**Based on the figures presented, we conclude the duck hunting season should be cancelled so as to prevent further declines in waterfowl numbers.**

We note also that:

- The ARI report is a fairly recent study (started 2020). Given the wide accuracy margins and lack of history to guide the use of the numbers any use of this report should use the L95 population estimate rather than the estimated population – precautionary principle.
- Not covered by the reports is any consideration of impacts on other species. It is well known that other non-game species are maimed or killed by hunters but the impact of this is not considered.

*Castlemaine Field Naturalists Club*



## Further critical factors which support a season close for 2022

1. Long-term effects of climate change which are predicted to worsen.
2. Birds' unique susceptibility to climate change.
3. Threat to migratory birds already experiencing significant decline.
4. Detrimental impact to bird populations of shooting monogamous bird species.
5. Adverse impacts of lead shot which is still used (impacts on people, animals and ecosystems).
6. Lack of data regarding game birds and threatened species present on wetlands prior to shooting.
7. Lack of data of game birds and protected species shot during duck season.
8. Lack of knowledge of where shooting areas are, and lack of compliance monitoring.
9. Shooters' critical knowledge gaps as proven by recent tests.
10. Lack of social/economic impact studies of duck shooting on the wider community.
11. Lack of data regarding the impacts of quail shooting including to the critically endangered Plains Wanderer which quail closely resemble.

The above points are detailed as follows.

1. The long-term trend of climate change and its impact on our waterbirds is rarely if ever mentioned by GMA. The Bureau of Meteorology has warned that our country is heating more rapidly than the global average. Worsening storms and floods, longer droughts, hotter, drier summers are some of the repercussions we are already seeing as a result of a 1°C rise in average temperatures. The bureau says we are headed for an unliveable 4°C rise in the next 80 years. The consequences for our wildlife will be catastrophic.
2. No consideration has been given by GMA to the fact that **birds are twice as vulnerable to climate change as mammals**. (Global Change Biology, Zoological Society of London – report by international scientists group based on 481 species in 987 populations around the world). With climate change set to only worsen, it is obvious our already struggling bird populations require protection from shooters.
3. No account is given by GMA to the **impact of duck shooting on migratory birds** who are in serious decline and particularly vulnerable to climate change and disturbance. Shooting disturbance at Victorian waterways adversely impacts their ability to obtain critical feed and rest prior to their long journeys along the East Asian-Australasian Flyway.

Of the species who use the flyway, 50 are in “catastrophic” decline and Australia is under numerous International obligations to protect them (<https://www.environment.gov.au/biodiversity/migratory-species/migratory-birds>).

We assume that the 2019 ARI report by Menkhorst on duck shooting disturbance to threatened species was influenced by GMA, as the “threshold” chosen for potential action is unrealistically high; it states that duck shooting “opportunities” will not be affected.

4. No consideration has been given by GMA to the ripple effect through bird species most of which form life-long pairs. In fact, 90% conduct joint parenting. (As a comparison, only 5% of mammals, including humans, pair up and raise young together.) When one of a pair is shot, it is likely any offspring won't survive and the remaining partner may never recover. The real impact to bird populations therefore of shooting the hundreds of thousands of birds reported as bagged each year in Victoria– even in “restricted” seasons – is far larger than just the “harvest” numbers. Refer [this article](#) by Professor Kaplan.

5. No regard has been given by GMA to the serious issue of **lead still used** legally in quail shooting and illegally in duck shooting (as reported most years). Lead is extremely toxic to ecosystems, animals and people even in tiny traces (emedicine.medscape.com/article/1174752) It is an insidious poison causing extreme suffering to animals who ingest it, such as dabbling ducks, swans and secondary predators like protected eagles. Given the decline in breeding noted the last several years, it is worth noting that lead also **inhibits waterbirds' breeding**. Refer this [short webinar](#) by Dr. Ruth Cromie – Head of Ecosystem Health, Wildfowl and Wetlands Trust (WWT).

GMA should be aware of the EPA analysis of a small number of Victorian wetlands in recent years and the toxic lead levels found in ducks (outside safe food guidelines) at Hearts Morass and MacLeod Morass (duck and quail shooting areas).

According to a Department of Sustainability & Environment report, each ammunition cartridge holds 30-45g of lead. Multiply 30g by the average number of 175,000 shot quail each year in Victoria (GMA harvest estimates) and one gets a staggering 5 tonnes of lead potentially pumped into Victorian (including food-producing) environments each season - without even adding in the lead deposited by missed shots. Lead is highly toxic.

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

GMA must cancel the duck and quail shooting seasons for this environmental reason alone - until more is known about this lead pollution issue.

**Lead and lead toxicity**

– extract from "[lead Toxicity in Nz Brown Teal](#)" by Massey University NZ 2014

Lead is one of the most toxic metals known to man and can cause disease in wild animals, domestic animals and humans worldwide (Fisher et al., 2006). Lead is a highly toxic non-essential heavy metal found naturally in the environment in small quantities however environmental contamination can occur due to anthropogenic use of lead based products (Hoffman et al., 2002; Pattee and Pain, 2003).

The most common routes of lead absorption by animals and humans are by ingestion, inhalation or absorption through the skin depending on the type of lead compound (Pattee and Pain, 2003). Lead is commonly used in domestic items such as shot, paint, batteries, plumbing material, solder, fishing sinkers, galvanised wire, foil, construction material, petrol among others (Dumonceaux and Harrison., 1994; Locke and Thomas, 1996).

The most common cause of lead toxicity encountered in wildlife is ingestion of lead shot, fishing sinkers and other sources of lead found in the environment (Hoffman et al., 2002; Davidson, 2006). The most commonly affected wild birds are waterfowl and birds of prey due to either direct ingestion of lead or indirect means such as via prey containing lead shot (Samour and Naldo, 2005; Davidson, 2006; Pain et al., 2009; Lambertucci et al., 2011). Other terrestrial birds and seabirds are also at risk due to the anthropogenic contamination of the environment with lead (Fisher et al., 2006; Pain et al., 2009).

6. **Insufficient data regarding birds including protected species present on wetlands prior to shooting.** In previous years (before GMA existed) over 500 wetlands were typically surveyed for the presence of bird species. However, neither GMA nor DELWP have been able to list, map or even estimate the number of all the thousands of waterways where unmonitored shooting is allowed, let alone monitor what may be present on them. Pre-shooting checks are now far, far fewer than they used to be.

It is the epitome of irresponsibility to continue to allow shooting in these circumstances and ludicrous to suggest "sustainability" can be ensured with such a gross lack of critical data.



The following contribution was made by Hamilton Field Naturalists Club:

*“The Hamilton Field Naturalists Club has had a couple of comments to make:*

- *The GMA has consistently allowed hunting on wetlands at Lake Linlithgow, Lake Bolac and Tower Hill when many hundreds of Blue-billed ducks and scores of Freckled Duck and Shovelers were present– and even a flock of 50 Brolga on Lake Bulrush in one year. They have done that despite the birds having no other sanctuary areas to go to. We regard that as utterly irresponsible and uncaring.*
- *There are no safe sanctuaries for waterbirds in SW Victoria – since DELWP and the GMA are unwilling to put any wetlands permanently off-limits then there is absolutely no case for allowing any hunting on the region’s wetlands. Apart from conservation and animal welfare considerations, tourists have no hope of seeing ducks and other waterbirds at close quarters on lakes or swamps while the birds can be shot at there. Birds depart when people approach closer than about 200 m.”*

*Secretary  
Hamilton Field Naturalists Club*

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

GMA’s own “Season Considerations” documents state *“To effectively manage game species, it is important to accurately quantify the number of animals harvested”*. Yet this is never done.

Despite GMA receiving millions more in taxpayer funds, there is a gross lack of monitoring. Given the vast number of waterways where duck shooting is allowed, even the army would be incapable of such a massive undertaking.

While earlier regulators commonly checked shooters bags at around 60 wetlands – still far too low a number to be able to accurately estimate the impact of shooting at thousands of waterways – GMA have struggled to check a tenth of that number. It has recently been confirmed no hunters’ bags were checked in 2020 or 2021 due to COVID. GMA should have cancelled the shooting seasons until they could have performed this basic function, to at least help in some small way, their requirement to monitor compliance and promote sustainability in hunting. (The GMA Act S6).

Estimates of numbers of birds bagged by shooters are not only based on a survey of a small number of shooters then extrapolated out assuming the entire duck shooter base would be the same, but reliant on shooters’ memories and honesty. We are still waiting for the results of the 2021 duck shooter survey, more than six months since the shooting ended. This suggests the data collection and analysis is problematic.

Estimates do not include birds shot and left behind including protected species, found most years by the public, some examples below:

- ⇒ Box Flat 2013 *“The bodies of about 760 game ducks and 155 non-game birds were left on the water at the Box Flat flood plains near Boort. The shooting happened on opening weekend of duck season”*. (ABC March 2013)
- ⇒ Lake Toolondo 2016, *“The Andrews government is headed for a showdown in the courts over the illegal shooting of dozens of rare and threatened birds during the opening of duck season.*

*The shooting occurred despite the presence of Victoria police and authorized compliance officers". (The Age April 2016)*

⇒ Kerang 2017, *"The total number of illegally shot freckled ducks now stands at 112. The latest find takes the total number of birds gunned down in the opening weekend shooting spree to 1,247 and this was from just one of Victoria's wetlands."* (Medianet March 2017)

The shooting of protected species during "duck season" has been occurring for decades.

Sadly since GMA's inception, there has been little data collected on this.

However a Freedom of Information Request (FOI) resulted in our obtaining documentation by previous regulators which shows a sample of the protected species killed in duck shooting seasons in Victoria (sample six years to 1993).

In addition, the documentation clearly stated more than once, **that partial wetland closures do not protect threatened species like Freckled or Blue-billed Ducks.** (ARI Technical Report # 135)

Year	Collected by animal welfare	Collected by CNR	Total
1988	152	152	304
1989	273	392	665
1990	374	80	454
1991	435	119	554
1992	250	94	344
1993	813	159	972

Number of protected and threatened species found dead at several Victorian wetlands in duck shooting season each year from 1988 to 1993.

According to the CEO of GMA, the numbers of protected species illegally shot each season are not quantified.

This horrific fact is further confirmed by Arthur Rylah Institute (ARI) who say in regards to the risks or impacts of direct hunting mortality on non-target species;

Impact of duck shooting to protected / threatened species?

Impact to protected / threatened species:

*"that is a separate question that can only be properly addressed by gathering robust data on the rates of non-target species being killed or injured by hunters. Such data does not exist and would be extremely difficult to gather"*

(ARI 2019 Report "Waterbird Susceptibility to Disturbance from Hunting")

Little if any effort has been afforded this critical component of "promoting sustainability" in duck shooting.

**Table 29** Number of specimens of non-game wildlife found dead around waters used for hunting during the 1993 duck open season. The data for birds collected by members of animal welfare organisations are counts made by CNR officers of birds delivered to CNR Heidelberg during the season.

Species	Collected animal welfare	Collected by CNR	Total
Freckled Duck <i>Stictonetta naevosa</i>	229	57	286
Eurasian Coot <i>Fulica atra</i>	242	35	277
Blue-billed Duck <i>Oxyura australis</i>	84	7	91
cormorant species	44	4	48
Black-tailed Native-hen <i>Gallinula ventralis</i>	0	43	43
Black Swan <i>Cygnus atratus</i>	29	14	43
Galah <i>Cacatua roseicapilla</i>	21	11	32
small grebes	19	5	24
Musk Duck <i>Biziura lobata</i>	19	1	20
Great Crested Grebe <i>Podiceps cristatus</i>	14	1	15
Australian Magpie Lark <i>Grallina cyanoleuca</i>	0	13	13
corella species	7	5	12
ibis species	8	3	11
White-faced Heron <i>Ardea novaehollandiae</i>	3	6	9
Red-necked Avocet <i>Recurvirostra novaehollandiae</i>	6	1	7
Yellow-billed Spoonbill <i>Platalea flavipes</i>	0	6	6
migratory waders	1	4	5
Australian Magpie <i>Gymnorhina tibicen</i>	0	4	4
Silver Gull <i>Larus novaehollandiae</i>	4	0	4
tern species	0	3	3
Barn Owl <i>Tyto alba</i>	0	3	3
raven species	3	0	3
Darter <i>Anhinga melanogaster</i>	2	1	3
Dusky Moorhen <i>Gallinula tenebrosa</i>	2	0	2
raptor species	1	1	2
kingfisher species	0	1	1
Noisy Miner <i>Manorina melanocephala</i>	0	1	1
Australian Pelican <i>Pelecanus conspicillatus</i>	0	1	1
Fairy Martin <i>Cecropis ariel</i>	0	1	1
Little Friarbird <i>Philemon citreogularis</i>	0	1	1
Brush-tailed Possum	0	1	1
<b>Total</b>	<b>813</b>	<b>159</b>	<b>972</b>

*“In 1993, animal welfare organisations concentrated their efforts at Lake Buloke, but also collected dead wildlife from wetlands near Kerang and Colac. A wide range of dead wildlife were collected, including non-game duck species, waterbirds and Brush-tailed possum. ...Thirty eight dead ducklings were collected; these were not identified as game or non-game”.*

972 protected species found dead at several Victorian wetlands in duck shooting season in 1993. These included Australia’s rarest native duck the Freckled-Duck, thought to be one of the world’s rarest, Blue-billed Duck, swans, galahs, musk ducks, magpies and ibis.

*A clearer copy can be viewed in the ARI Technical Report No. 135.*

**Importantly, these tables show only a fraction of the true toll on our protected species which is likely much larger because the vast majority of waterways where duck shooting is allowed, aren’t monitored.**

It is highly irresponsible of GMA – if they are concerned with sustainability – to continue to allow shooting when such a high number of protected and threatened species are impacted. Allowing shooting to occur in these circumstances is playing Russian roulette with our birdlife, many species threatened and unique to our country.

In their 2017 Hunters Bag Survey Report, ARI state that less than ten wetlands (out of thousands) were checked for wounded / un-retrieved birds. Just at these few, 18 birds were found including nine dead swans and two dead pelicans.

According to their 2018 report, only one wetland was checked for wounded/ un-retrieved birds.

In both the 2017 and 2018 reports, ARI's number one recommendation was that more wetlands needed to be checked and more data collated to be able to determine the impacts of hunting on waterbird populations.

Yet the number of any such checks for 2019 and 2020 was understood to be zero.



Birds left behind after duck shooting: including penguin, musk duck and pied cormorant (protected species). Picture Kim Wormald

8. **Serious shooters knowledge gaps.** As shown by GMA's recent knowledge tests:

- Only 42% of hunters of all animal types got a general knowledge question on personal safety correct.
- Only 37% of duck shooters were able to correctly answer a two-part question on wounding.
- Only 20% of duck and quail shooters were able to correctly answer a three-part question on identifying game species.
- Only 13% of duck shooters correctly answered the question on dispatch of downed birds.

Further, there are no ID tests for quail shooters, even though quail resemble the critically endangered Plains Wanderer which are the subject of a significant taxpayer funded recovery project.

These knowledge gaps pose a significant risk to people let alone our struggling bird populations - more reason GMA must insist on a season close.

9. **Lack of cost-benefit analysis or social/economic impact studies on the wider community.** GMA suggest that duck shooting is of economic benefit to rural communities. This statement is not based on a cost benefit analysis and ignores the analysis by independent economists such as The Australia Institute, Dr Kirsty Jones and VEAC Red River Gum Investigation reports which state duck shooting is detrimental to rural economies. It also ignores scores of surveys and petition feedback from rural communities. GMA's statement is purely based on a small survey of shooters, answers unverified, which does not take into account the adverse impacts to the wider community and the cost to the State of regulation and compliance.



Even so, the **latest survey summary report by DJPR showed duck shooting expenditure (according to shooters) dropped 46%** and associated jobs fell 31%, down to just 587 state-wide from 2013 to 2019\*. Quail shooting expenditure fell 58% and jobs 48% to a mere 202.

\*Duck shooters may argue their decreased spending is due to reduced season length. But the reduction in shooting days was only 12%. They may also argue reduced bag limits was a reason but this won't fly either, because in the survey, shooters said the main reason they go hunting is to "be in the outdoors" (not to kill animals).

The recent economic analysis by the Parliamentary Budget Office (PBO) put duck shooters at a potential spend of just \$4m - 10 m. When one compares this to the spend by 1.4 million tourists who birdwatched in the first year data was collected (Tourism Research Australia, 2019) which was \$2.88 billion, and noting that independent economists (and polls) show most tourists avoid shooting areas, it is quickly understood how duck shooting is a **cost** to rural communities.

A major failing of these hunter economic impact surveys is the omission of costs. The costs to taxpayers of law enforcement and compliance monitoring for example or of the adverse impact to tourism and other activities due to unmonitored shooters killing animals in public areas. Studies show most tourists - and domestic tourism is worth \$80 billion to Australia - avoid areas where shooting occurs.

Consider the impacts of "[coked up shooters](#)" and [campers' terrifying nights](#), of over [30 instances of hunting and firearms offences](#) in a single weekend.

The number of tourists to just one area where they shoot with cameras, like Yea Wetlands, is 30,000 and to Winton Wetlands 66,000 annually. And let's not forget Phillip Island Nature Parks which contributes around \$500 million a year to our state, and of this, \$120 million and 800 jobs just to the local government area.

To provide authenticity to the debate over the supposed economic benefits of duck shooting, it is important to consult with those in the tourism industry. Our submission includes comment from Susan Kerr travel:

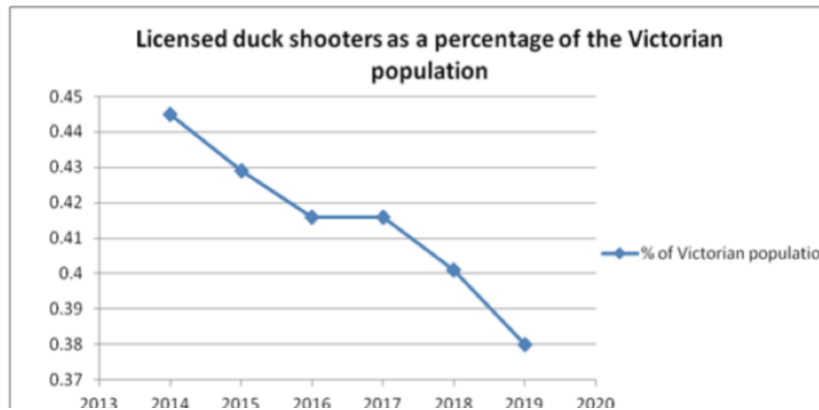
*"It is well known in the travel industry that any form of animal hunting is anathema to most travellers and generally countries and regional centres have discovered in recent times that there is more financial benefit from 'wildlife viewing' than killing!"*

*There is a worldwide travel industry movement to train staff in educating clients on 'Not riding or harming wildlife' at all and many of these so-called tourist attractions have been or are in the process of shutting down.*

*Regional centres would see more tourism financial benefit by changing their mindset to promoting wildlife especially as bird watching is becoming more and more popular."*



GMA also incorrectly state duck shooting is “popular”, quoting numbers of game licences issued which is misleading because the population of Victoria has boomed. The accurate measurement is the percentage of the population interested in duck or quail shooting which is tiny (less than half of 1%) and declining. Half this tiny number again are active.



Less than half of one percent of the population are licensed to shoot ducks. Less than half again are active, yet this tiny number significantly negatively impacts the wider community and deters the tens of thousands of tourists such as birdwatchers flocking elsewhere. **Update: The figure for 2020 fell further to 0.35% - so low it is off the scale of this graph.**

Duck shooting, a declining pastime in which only 7700 participants partake is not “popular”, particularly when continual polls show the majority of Victorians – city and country – are opposed.

Birdwatching, one of the fastest growing pastimes in the world in which over 1.4 million participants took part in Australia in the first year data was collected (2019), is “popular”.

*And the former should not be allowed to hamper the latter!*

**GMA must cease incorrectly asserting that duck shooting is popular or of economic benefit to regional communities.**

In 2020, over 21 organisations including leading conservation, environment, regional and animal welfare groups provided statements / submissions to GMA calling for a season close. They were ignored.

In 2021, the number of groups calling for a ceasefire had grown, exemplified in the list of 44 major business, union, environment and wildlife organisations who signed on to our “Alliance” advertisement which ran in several major newspapers. Their members and supporters number in the hundreds of thousands. This is in line with the continual professional public polls which show the majority of city and country constituents oppose duck shooting.

In 2022, the number of First Nations Clans, business, union, environment and wildlife groups willing to publicly support our stance has grown further.

**This submission proudly includes the voices of regional groups – those on the ground, whose lives and livelihoods are impacted by duck shooting for weeks, usually months, each year.**



The following comment by Goulburn Valley Environment Group makes a powerful point:

*“Many wetlands across Northern Victoria receive environmental water for the promotion of aquatic ecosystems; waterfowl are an important link in the restoration of these wetlands.*

*The Victorian public and local communities have a significant investment, both financially and in the management of these wetlands for ecological outcomes.*

*Where water in these wetlands is wholly attributable to environmental water deliveries, hunting should be banned to promote multiple ecosystem outcomes.*

***I question the use of environmental water to facilitate hunting which in turns impacts wetland ecosystems.***

***Surely we Victorians are smarter than this!”***

***President of Goulburn Valley Environment Group***

GMA may have noticed the increasing number of articles in regional papers submitted by regional families and farmers impacted by duck shooting. Often these authors have submitted communications to GMA in the first instance to no avail. Hence it would seem not only is GMA not actively sourcing feedback regarding impacts of hunting to community but is actively dismissing it.

Attached to this submission are:

- Attachment A: The voices of regional Victorians around the state living with duck shooting.
- Attachment B: The comments of local community at Mount Alexander Shire requesting duck shooting be excluded from their local wetlands. Their petition attracted 483 signatures, mostly local, compared to a counterpetition run by duck shooters which obtained 21 signatures, only 11 locals.
- Attachment C: A first-hand account of a “Home and business under siege”.

All of this is relevant in GMA’s consideration of the social / economic impacts of hunting, taking into account externalities.

Despite their power to make recommendations to Ministers regarding public land open / closed to shooting, despite their requirement to consider a triple bottom line assessment of social / economic impacts of hunting, GMA have so far failed to exempt the locales of Attachments A & B, from shooting and we believe, failed their obligations under the GMA Act.

10. A word on Quail. It is highly irresponsible and a key demonstration of GMA’s failings, that GMA allows full quail shooting seasons every year in Victoria without 1. holding any public consultation or 2. knowing critical quail population data.

Despite the fires and the fact there is little population data of quail before or after shooting seasons, despite the fact quail closely resemble the critically endangered Plains Wanderer, GMA has allowed a full Quail shooting season to take place in Victoria, with a full bag of 20 birds a day per shooter, with hardly any monitoring.

For the pitiful economic “benefit” claimed to be associated (according to surveys of hunters) - which has fallen 58% between the last two “economic” surveys - the harm being done to ecosystems in quail shooting is significant.

If GMA are concerned for sustainability, GMA should recommend as a matter of urgency:

- a moratorium on quail shooting until quail numbers are better understood
- mandate accuracy tests for quail shooters
- ban the use of toxic lead ammunition

These are all things GMA can recommend to Ministers and should have done so long before now, in the interests of sustainability. It would be in the public interest to know how many GMA staff are recreational quail shooters.

## **Conclusion / Recommendation**

Up until now, recommendations to hold duck and quail shooting seasons have been made by GMA based on little if any evidence. We are unfortunately seeing the ramifications of that in ongoing plummeting of bird numbers and stressed ecosystems.

**If GMA are at all concerned with sustainability, or the impacts of hunting on anyone other than a minority group of bird shooters, it’s long past time GMA recommended a season close for duck and quail shooting. They MUST do so for 2022.**

Thank you for the opportunity to make this submission. We hope to see GMA ensure the sensible outcome, that is, duck and quail season cancellations.

### Regional Victorians Opposed to Duck Shooting Inc.

*Regional Victorians Opposed to Duck Shooting Inc. is a not for profit association which incorporated in April 2018. It now has over 5500 supporters, consisting largely of those who live or work around Victorian duck shooting areas adversely impacted by it. [Click here](#) to see some of what rural people said.*

Attachments:

- [Attachment A](#): The voices of regional Victorians around the state living with duck shooting
- [Attachment B](#): The comments of local community at Mount Alexander Shire requesting duck shooting be excluded from their local wetlands. Their petition attracted 483 signatures, mostly local, compared to a counterpetition run by duck shooters which obtained 21 signatures, only 11 locals.
- [Attachment C](#): A first-hand account of a “Home and business under siege”.

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