

## Wildlife Regs – Regional Victorians Opposed to Duck Shooting inc.

Thank you for the opportunity to provide feedback. Our focus is not just from a cruelty perspective, but from a safety, biodiversity and amenity perspective as well.

Our strong suggestions below, to ensure regulations are “contemporary, fit for purpose, efficient and effective”.

1. Given significant risk to wildlife, ecosystems and the public, wildlife shooting seasons should be set to the default position of "**off**" with the onus on hunting groups to prove it will be sustainable before each season, from a biodiversity, social and economic perspective. This allows for changes in climatic conditions, breeding, fire etc. (Currently the regulator recommends seasons based on little data because it is “law that seasons take place each year”.)

2. Safety risk assessments at all shooting locations, to be done prior to any decision to support a shooting season at those locations. Special consideration to be given to results of consultation with nearby landowners, residents and businesses.

3. Independent Victorian Auditor General's Office (VAGO) approved survey on social/economic impacts to rural economies to be done and taken into account prior to any decision to support a shooting season. (We are advised that there have so far been four taxpayer funded shooters surveys – 3 including Victorian shooters and one covering NSW shooters - but none for anyone else.)

4. Any recommendations for hunting seasons to be peer reviewed by relevant scientists (reviewers to declare whether or not they are/have been recreational hunters themselves) and signed off by relevant scientists, Wildlife Victoria, Zoos Victoria and environmental groups such as Environment Victoria, Victorian National Parks Association, Climate Council etc.

5. Shooting should only be allowed in a limited number of specified areas which will be monitored by officials at all times, those areas being clearly signposted and mapped as shooting areas and at least 750 meters away from residents, the road or the public. This is the distance shotgun pellets can travel, potentially causing blindness if they were to land in eyes or other injury. Note rifle bullets can travel far further. (Firearm Safety Code).

***The Firearms Safety Code**, a booklet approved by the Firearms Consultative Committee and Victoria Police, states on page 11, that the range for a shotgun is **250 metres to 750 metres**. The range of shotfall may be doubled with tail winds in excess of 50 km per hour. (Western Australian Police, Firearms Ranges, Standards for Approval vs 3/2008, page 3-4). This is a common occurrence on regional wetlands/waterways.*

6. Those specified shooting areas must have wildlife refuges nearby to which wildlife can escape. (Currently - for example around Boort or Linlithgow this is not the case). Note the new legislation allowing camping and shooting on leased crown land with water frontages will destroy previous refuges for waterbirds fleeing shooting grounds.

7. Hunting should only be allowed from 10am to 3pm to ensure good light conditions and out of respect to residents and other recreational users who are disturbed by the noise of gunfire. Similarly there should not be any shooting on Sunday or over religious holidays like

Easter. However even more strictly, duck shooting should only occur for 0.3% of the year, that is 1 day – to equate to the percentage of the population who partake.

8. Hunters must have passed a robust accuracy test (the current WIT is grossly insufficient) for the species they are shooting, within 12 months of shooting. Zero tolerance for error. 100% pass mark.

9. To minimise wounding and safety accidents, hunters must be at least 18yo. (This is in line with the National Firearms Agreement). Note the many studies by psychologists which link hunting and animal cruelty to violence and anti-social behaviour as adults.

10. License fees must significantly increase to cover the cost to community of rubbish clean up, toilet facilities, research and monitoring. Taxpayers – most of whom oppose hunting – are forced to subsidise the Game Management Authority and the Sustainable Hunting Action Plan (SHAP) because hunting license fees are too low. This sends a signal to shooters that wildlife is cheap, not valued by the government. Licenses for ALL hunters to be paid for and at a significantly higher price. (Currently children, international shooters and commercial bird shooting farm attendees pay nothing which again implies that little value is placed on our wildlife).

11. Closer scrutiny of license data – mandatory provision of contact details (valid phone number, email address and residential address – not just a PO box) and proof of e.g. firearms license at time of license application.

12. Go-pro cams to be mandatory on all hunters' weapons to provide evidence in case of illegal incidents.

13. All ammunition to be identifiable back to the owner to provide evidence in case of illegal incidents.

14. Bows and arrows banned for hunting. Very few archers would be capable of humanely killing an animal with bow and arrow.

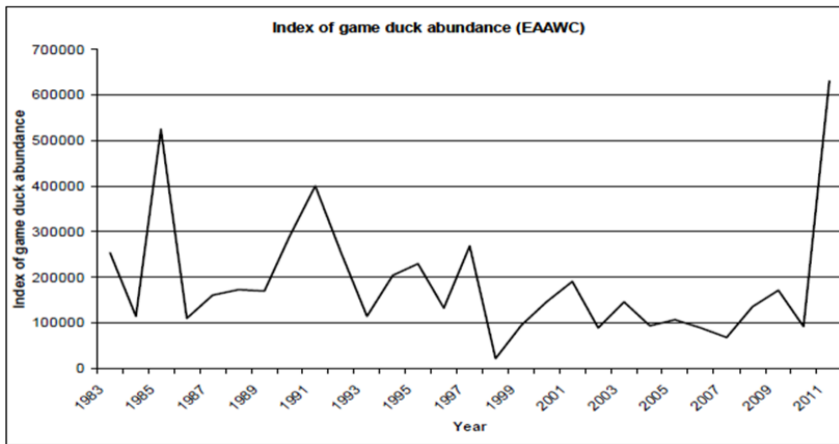
15. Those set to benefit recreationally or financially from shooting should NOT be involved in policy recommendations. Where they do write or speak in favour of a hunting season they must declare their own interest. Following the Pegasus Report 2018 which condemned the regulator for being conflicted, it is too often the case that obviously flawed recommendations are put forward to Ministers to hold hunting seasons. This is without considering the glaring red flag of data being manipulated to suit the hunting seasons. Back in 2012, the RIS and regulations were based on fake claims that "regulated" hunting has no effect on the long-term decline of waterbird populations. On pp35-36 of the 2012 RIS, the data from Kingsford's aerial surveys (fig 6) was falsified to support the incorrect claim that duck populations hit a record high in 2011. Consequently we feel **it is appropriate there is a major roll-back of the pro hunting changes introduced in 2012**. See extracts below.

*"In fact, since the breaking of the [Millennium] drought in 2009, game duck numbers have responded to widespread flooding events across eastern Australia. A significant increase in wetland availability stimulated substantial breeding and, in 2011, eastern Australian game duck abundance recorded its highest level since the survey began in 1983 (see Figure 6) ...*

*"The current regulatory regime... is sustainable and has not prevented game ducks from reaching their highest level of abundance in 2011 in almost 30 years."*

This is patently false. Kingsford’s survey data shows in 1984, game duck abundance was 966,292 and in 2011 it was only 630,470 – 35% down. But the RIS produced a falsified graph (Fig 6, below) supposedly showing Kingsford’s data. Note that the true 1984 abundance would not even fit on the vertical scale of this graph from the RIS.

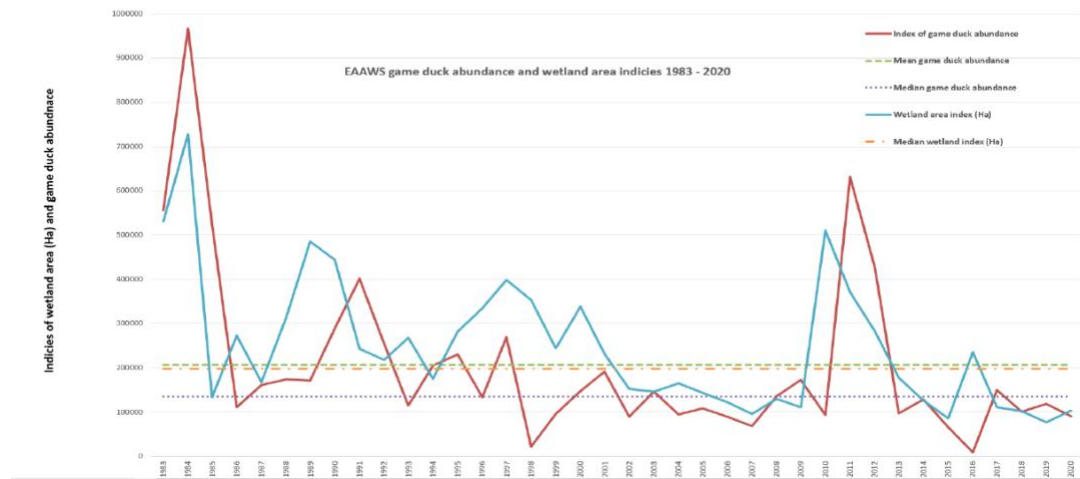
Figure 6: Index of abundance of game ducks as recorded during the Eastern Australian Aerial Waterbird Count



The current hunting regime and its enabling regulations are based on this falsified premise from 2012, that shooting has not depleted game duck populations.

The correct (non tampered with) graph is below (GMA: Considerations for the 2021 duck season):

## Game duck abundance, distribution and habitat - summary



16. Police involved in compliance checks should not be hunters themselves and they should be required to pass a test re knowledge of hunting. (\*\* we have an example where a local policeman thought it was legal for duck shooters to be shooting at night from a moving boat).

17. Replace the word “harvest” with “kill” in all discussions e.g. the RIS and draft regulations. Using the word “harvest” is incorrect and also causes the public – most of whom are opposed to hunting – to believe the government are biased towards the minority group of hunters.

18. Remove the word “popular” from hunting literature as it is false and misleading (and leads the public to view the government as biased to the minority group of hunters). Only two in every thousand Victorians participated in the 2019 duck shooting season and half that number in 2020. By comparison, professional polls continue to show majority of Victorians want duck shooting banned, with the strongest support coming from regional areas (Ucomms).

19. Remove reference to “economic benefit” of hunting as there has been no cost benefit analysis done. On the contrary independent economists state hunting is economically detrimental particularly to rural communities. To say otherwise is false and misleading. In particular, the 2014 government report “Estimating the Impact of Hunting” clearly stated (p14) that its findings should not be used to justify one particular course of action against another (or even compared with doing nothing): a cost-benefit analysis is the appropriate tool to justify an activity (e.g. hunting).

20. Ban all use of lead ammunition in hunting. It was banned in duck shooting decades ago – why is it still allowed to be used in other forms of hunting? There is overwhelming evidence that lead is highly damaging and in extremely cruel ways, to ecosystems and wildlife including secondary predators like threatened White-bellied Sea Eagles. One pellet is enough to cause organ failure and death. Latest health advice is there is NO safe limit of lead in a person’s blood. A report by CSIRO was damning in its conclusion the “Australian government has its collective head in the sand” on this issue.

21. Ban all use of bird callers especially electronic and all types of duck decoys. They are inconsistent with the concept of “fair chase” discussed in the 2012 RIS (p24) and they are inconsistent with the shooter claims of “tradition”. They falsely lure remnant bird populations to an area where they are mowed down in a one-sided ambush with no chance of survival.

22. All government “consultation” meetings with hunting stakeholders and community members to be minuted and copies of minutes publicly available to ensure trust and transparency.

23. No hunting to be allowed on leased crown land water frontages where it will be even more out of sight and impossible to monitor by authorities.

24. The Blue-winged Shoveler to be permanently removed from the list of game species. It has been restricted or banned for most of the seasons since 2012.

25. All game species that are in statistically significant decline (Kingsford’s EAAWS report 2020) to be removed from the list of game species until they recover.

26. More rigorous checks of hunters’ bags, that is, every day, everywhere shooting occurs.

27. Especially in light of Victoria’s ecosystem decline (hence the Parliamentary Inquiry), ARI reports to include data on the protected and threatened species killed and maimed each shooting season. In order to be able to report on this, monitoring for this data must take place at each shooting area each day of shooting.

Please note by submitting these requests, we are by no means condoning hunting in any way. The activity is extremely unpopular (less than 1% of the population partake - vast majority men), damaging and an unnecessary risk to wildlife, ecosystems and rural communities. It should be banned. A safer, more popular and lucrative alternative is to divert public funds away from hunting to wildlife watching, one of the fastest growing pastimes in the world and one in which Australia – with our unique wildlife – could be a world leader with little investment.

References re dangers of lead ammunition:

- <https://todaysveterinarynurse.com/articles/management-strategies-lead-toxicity-a-threat-to-wildlife/>
- <https://www.publish.csiro.au/wr/pdf/WR17180>
- [https://www.environment.vic.gov.au/\\_\\_data/assets/pdf\\_file/0022/32494/Use\\_of\\_lead\\_shot\\_in\\_cartridges\\_for\\_the\\_hunting\\_of\\_waterfowl.pdf](https://www.environment.vic.gov.au/__data/assets/pdf_file/0022/32494/Use_of_lead_shot_in_cartridges_for_the_hunting_of_waterfowl.pdf)