



# 2024 Duck Season Submission

submitted to  
**Game Management Authority**  
**8 January 2024**

This submission was made to the Game Management Authority (GMA) on behalf of Victorian Duck Hunter Association (VDHA) members on January 8, 2024. It relates to the considerations for the Duck Season 2024 arrangements and provides a number of considerations that the GMA ought to consider in the provision of the 2024 hunting season.

## About VDHA

VDHA represents its members interests with Government departments and Government to ensure the continuation of hunting in the State of Victoria. Victoria has a long and established history of safe sustainable and responsible hunting of Duck, quail and deer species and has the largest quantity of licence holders for duck and quail hunting in the nation.

VDHA is a recognised stakeholder with government and provides expertise and knowledge from a stakeholders perspective.

**Danny Ryan | VDHA PR and Politics Officer**

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# 2024 Duck Season Submission

## Executive Summary

The following considerations are presented to the GMA board for discussion and provides alternative analysis of several key documents, Government provided data, abundance count information, Victorian select committee into Native Bird hunting evidence and other sources of information pertaining to duck and quail hunting in Victoria.

### *Sustainability*

**VDHA considers;** Sustainability and linking offtake quotas to known scientific abundance is preferential to alternate and often flawed previous considerations as applied to setting harvest limits. Some data such as EAWS is not fit for purpose and only useful for small component pieces of a larger and wider data gathering process for the AHM. There is expert evidence that sustainability is unaffected by the small quantity of game ducks and quail harvested in an annual season. The present abundance levels when linked with variations of % offtake from 10-30% will not unduly influence sustainability.

### *Climatic (BOM Forecast)*

**VDHA considers;** BOM data is highly susceptible to change, game ducks are highly nomadic, Victorias (and the eastern seaboard's) current wetland index is high and should not influence any season length or bag limit.

### *Interim Harvest Model - Season Length*

**VDHA considers;** Given the current abundance conditions the recommendation from the IHM should be for full legislated season length and full 10 bird bag limit with all species included.

### *Expert Data - Prowse*

**VDHA considers;** A sustainable harvest level based on government abundance and expert harvest percentage advice from 10-30% when applied to population abundance and historic harvest levels should be considered when making recommendations to setting bag limits. When levels of abundance are heightened far above averages, that should determine a significant increase in the bag limit. Given the heightened abundance of Wood Duck, these should be subject to an additional bag limit as demonstrated by this year's data up to TEN in addition to either an ultra conservative 10%, conservative 20%, or upper sustainable 30% seasonal bag limit.

### *Opening Day Considerations and Exceptions*

**VDHA considers;** An increase to the opening two days seasonal bag limit to 15 birds per person will provide a sustainable outcome that allows harvest level given a super high prevalence of game ducks demonstrated by numerous data sets and sources. Other than a traditional Saturday opening, a Friday opening day is preferential. Additional wood duck for every other day of the season after the Opening two days of the season.



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### *Human Safety*

**VDHA considers;** we recognise the existence of the radical animal activism cohort in the state who protest all things involving animals; hunting, racing, animal ownership, breeding, fishing, farming and a myriad of other animal 'causes'. Animal activism is big business and sits in a busy activism space with multiple agencies that creates an ever increasing competition to be more 'activist' than your competitor. We have seen the rise of what was once relatively calm protest behaviour become aggressive, combative and plainly dangerous in this state, as recognised by the recent protections introduced for farming and bio security. Hunting deserves the same protections.

### *Hunter Behaviour and Enhancement to Compliance*

**VDHA considers;** GMA and partner agencies should plan and produce materials specific to assist with compliance activities and engage with hunting stakeholders to work on areas open to enhancement.

### *Regulations and Start Times*

**VDHA considers;** The start time for the first three days of the season should be closer to sunrise with a 0730h start statewide, and finish time for the first three days at sunset 1930. Subsequent days revert to 30mins before and after sunrise/sunset. Increased compliance effort by partner authorities in regards to dealing with anti-hunter behaviour whilst GMA compliance effort centre around hunter activity.

### *Select Committee*

**VDHA considers;** Much rhetoric about wounding rates is emotive and highly erroneous but is driven by many anti-hunting groups under their agenda, inflated and overquoted numbers designed to instigate and their narrative and false information whilst they fail to produce real-world evidence or any quantity of wounded birds to support their claims. Hunters have improved methods and skills and will further drive down the wounding rate numbers with assistance and consideration from positive regulation and education.

### *Sustainable Hunting Action Plan 2 (SHAP2)*

**VDHA considers;** many points of concern raised by the select committee findings are addressed by ongoing components of SHAP2 which is the responsibility of Government. As a responsible stakeholder of Victorian hunting the VDHA, along with other hunting organisations, continues to stand ready to educate and provide our members with resources, skills and tools to be better hunters and act in a safe, sustainable and responsible manner.

### *Radical Anti-Hunting Groups*

**VDHA considers;** these anti hunting groups are NOT hunting stakeholders and subsequently should be dismissed from roles and functions with the GMA board, various committees and working groups and any and all submissions received from them ignored.

**Danny Ryan | VDHA PR and Politics Officer**



# 2024 Duck Season Submission

## Executive Summary

### *Further Training and Hunting Continuation*

**VDHA considers;** every hunting organisation as a major stakeholder should take part in a joint conference and workgroups to map and plan these management tools. Hunting has extraordinarily HIGH COMPLIANCE (>99%), and onerous and overcomplicated additional regulation will cause hunters to exit. Existing hunters over the age of 65 to be exempt from any new regulations. Hunters must also be assured that complying and new initiatives will result in enhanced hunting opportunity, continuation and support of hunting in Victoria.

### *Quail*

**VDHA considers;** at preliminary stages, indication of previous 2023 abundance and distribution present no evidence for any restriction or change to the current regulated season length or bag limits.



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## Sustainability

At the Victorian Select Committee into Native Bird Hunting, Friday 26th of May 2023 hearing Professor Richard Kingsford, in his introduction stated;

**"The fundamental issue here is that we have been losing waterbird habitat, wetland habitat, over decades as a result of increasing extractions and regulation of the rivers for the Murray– Darling, and we see that in the impacts on freshwater organisms that rely on those flows. At the same time, we also investigated whether there was any effect of hunting on those species, and we found a very small effect, which was considerably overridden by the loss of habitat effect."**

This year's EAWS (2023) executive summary and following 17 'results' interpretations are confusing given such positive data, some of the commentary is extraordinary and highly unusual given there has been muted and restricted summaries in the previous 39 iterations of the EAWS.

The drought effected areas of NSW and Queensland is very small in terms of percentage and land mass, given large tracts of Queensland and NSW are predominately dry land. There are large wetlands and many ephemeral wetlands holding good levels of water from the 2022 floods OUTSIDE of the transects. The continental landmass of the Eastern Seaboard of Australia is considerable and wetland distribution varies greatly both along transects and outside transects, notably with some very large wetlands and wetland complexes outside the EAWS transects, transects which only survey **12-13% of the landmass**. Whilst some things can be determined by counting and checking in small sample areas, counting waterbirds on small sample areas, needs further methodology adapted to become a truer snapshot of game duck abundance at a given point in time.

Game ducks have increases by orders of magnitude with average highest counts between the ranges of 2nd-14th highest abundance over the last 40 years of the EAWS. Its plain, with the exception of Mountain duck (which we know is an outlier in this year's dataset), that all other species have increased their abundance and reversed decline. Populations rise, populations fall and they rise again, there are many positives in the EAWS but it's downplayed to seemingly suit a narrative of climate change, long term decline and general doom and gloom, it's almost like there's a litany of reasons as to why the 7th highest abundance of waterbirds is a bad thing. Long-term averages do not lie, but it seems that's not what the summary in the EAWS indicates; lots of decline listed however all of the graphs and data indicate high abundance that have increased on last year and effectively addressed and reversed decline. The **ONLY** decline is the number of years waterbirds appear below the long term average; hence the term 'long term decline' is misleading; what's more accurate is the statement the **"EAWS 40 years records on abundance are more often below the long term average than above"**.





# 2024 Duck Season Submission

## Sustainability

Many duck species listed as no trend when in fact the abundance is in advance of last year; hence increase. This trend was also evident when game duck species are isolated and compared without the other waterbird species across the history of EAWS (Brown, P., April 2023, On Analysing Trends in EAS Game Duck and Waterbird Count Data). Most game duck populations are well above the long term average and increased over last year. This is an **INCREASE**, not decline. The first two years count still casts doubt as to its accuracies considering the long term averages and counts and by admission of its creator the difficulty in training people to participate in and conduct the survey, and its long term effect on data is of continued concern.

The three largest breeding events in the 40 years of EAWS are nearly all in the last decade, 2010, 2016, 2022. EAWS indicates a massive increase in abundance but then turns to say the breeding index is down and reduced. You cannot possibly have massive increase without breeding.

Kingsford himself stated at the Select Committee hearing that;

**"The game species I do not think are monitored very well in terms of how much breeding, and that is one of I think the knowledge gaps. They are not easy to monitor, because they are very cryptic, and that is not when they want to be seen because of predators et cetera. They are not as easy as colonial waterbirds to monitor. But certainly in other jurisdictions around the world where duck populations are managed, one of the major indices is how much breeding occurs in a particular year. We certainly picked up some breeding of duck species, game species, in our aerial surveys, but when you are flying in a plane there is even less chance that you are actually going to see one of these birds breeding."**

EAWS is subjective in regards to analysis, given some the same inconsistencies are prevalent throughout the 40 years of EAWS it needs to be considered alongside many other forms of data such as the Victorian ARI data, NSW Heli data. EAWS is a major contributor to the Interim Harvest Model which will be replaced from 2024 with an adaptive harvest model as per Victorian Labor Government lead SHAP2.

The Victorian ARI Heli Data and Analysis by Dave Ramsey, Ben Fanson, Arthur Rylah Institute, DEECA, Victoria, is produced specifically to survey game ducks, and was conducted from mid-October to the first week in November. This robust survey uses a combination of aerial and ground counts, applies statistical and satellite imagery of available wetlands and is built for, and more importantly, fit for purpose.

The 2023 result of median result of design based estimates of 7,120,600 is a 195.46% increase over the 2022 result of design based estimate of 2,410,000.



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## Sustainability

The **NSW DPI Heli data count** is similar to the Victorian ARI count in both methodology, data collection and application of similar modelling. Its important to recognise it counts a smaller area and focuses on the Murray Darling Basin within a small part (geographically) of NSW. Is has been subject to budgetary constraints and has counted some wetlands consistently but not others, omission of channels in 2022 but included in 2023 is a major change, it demonstrates if you count more wetlands and waterbodies you find more game ducks. The NSW data for 2023 produced a count of 4,294,832 game ducks across 9 species an increase of **345% over 2022**, however it did not count ephemeral wetlands in the MDB. Importantly the NSW DPI allocate 10% of the Total abundance quota, across **ALL SPECIES** (Table 2, page 16) and is then followed by subsequent detail on page 17 which states;

**"Management quotas are established for species where there is less risk from exploitation. These ducks have relatively large populations, are widely distributed, and some monitoring data suggest that their populations respond predictably to environmental changes. For species with a higher risk of overharvesting due to smaller populations and/or uncertain dynamics, reactive quotas are recommended."**

This mirrors many findings of the ARI, Expert panels advising the GMA and hunting bodies in general agree in terms of waterfowl sustainability. Professor Prowse's report from 'Conservation and Sustainable-Harvest Models for Game Duck Species Thomas Prowse July 2023' suggests much higher sustainable offtake percentages than NSW's 10%.

The NSW count was conducted earlier in the year (May-Jun 2023) than both the EAWS and ARI Vic data. This means it was conducted PRIOR to the peak initial breed of spring. Given the speed and propensity that Australian game ducks breed in conditions still available the NSW Heli data numbers could be as little as 30-40% of what is there now. This is similar to the current Victorian conditions where with the latest rain events in November and December 2023 we will witness an additional factor of abundance increase as game ducks continue to breed.

At the select committee hearing Professor Klaassen stated:

**"Just generally, for ducks, they are very resilient. They reproduce at a very young age, possibly even within a year, notably here in Australia, and when the conditions are right they just keep on breeding – many species of ducks. They also have large broods. When opportunities arise for reproduction they reproduce, and there is also no so-called density dependence observable in ducks, not only in Australia but just generally. So it is not that they hit a limit; it is really that when there is a good environment for them they breed, and they breed and they can bounce back quickly."**

Given the MDB is in close proximity to northern Victorian wetland systems as ephemeral wetlands change (increase or decrease) the nomadic nature of Australian game ducks could mean shifts of multiple MILLIONS of birds into or out of each area.



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## Sustainability

**VDHA considers;** Sustainability and linking offtake quotas to known scientific abundance is preferential to alternate and often flawed previous considerations as applied to setting harvest limits. Some data such as EAWS is not fit for purpose and only useful for small component pieces of a larger and wider data gathering process for the AHM. There is expert evidence that sustainability is unaffected by the small quantity of game ducks and quail harvested in an annual season. The present abundance levels when linked with variations of % offtake from 10-30% will not unduly influence sustainability.

## Climatic (BOM Forecast)

Kingsford references in his explanations in EAWS;

1. Global warming references are odd and out of place; as increases to abundances demonstrate
2. Dry October and references to BOM, instead all of the Eastern Seaboard had above average rain in November and now in December cyclone activity has produced serious flooding in FNQ and widespread rain event in Victoria and NSW that will trigger further breeding into Jan/Feb 24.
3. Low stream flows generated from low rainfall in October, as it's now rained in November and December which will in turn increase stream and environmental flow/emergency releases of water. The majority of water storages are at very high capacities as noted.
4. Water storage references go against previous Kingsford statements that deep water storages do not influence abundance as it's not preferred habitat for waterbirds

BOM data, as per previous years has been highly susceptible to change, any forecast is subject to error, the predicted El Nino seems to be incorrect and La Nina conditions continue, with large water bodies contributing to continue atmospheric moisture content it would be just as likely to have continued rainfall than less.

The ARI preliminary data indicates (page 2, chapter 1.3.1 Water Surface Area);  
"Overall, surface water availability in 2023 has declined slightly since 2022 for both wetlands and dams but was still higher than in either 2020 or 2021 (Figure 1)."

In the last two months Nov/Dec 2023 we have seen multiple rain events that have topped up wetlands and produced up to moderate flood levels down rivers that in turn feeds wetlands along those systems. It is expected this will produce another breeding boom for Jan/Feb 2024.



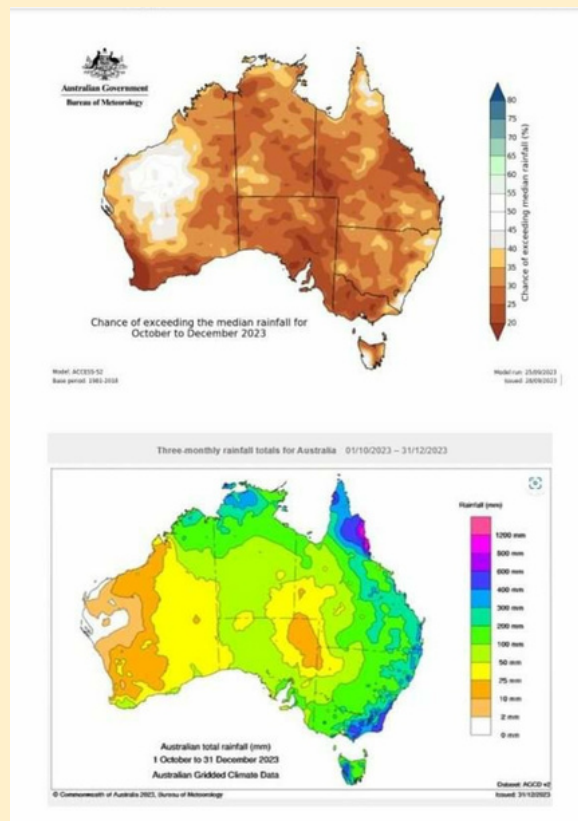


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## Climatic (BOM Forecast)

The BOM forecast (top) and actual (bottom).

**VDHA considers;** BOM data is highly susceptible to change, game ducks are highly nomadic, Victorias (and the eastern seaboard) current wetland index is high and should not influence any season length or bag limit.



## Interim Harvest Model - Season Length

The Interim Harvest Model has produced a 9 bird bag, indicates a full length season, and as its expert authors continually state its desirable to moderate bag limits to control harvest not the season length.

Year on year analysis of the EAWS and season declarations and Victorian season settings for previous years would produce a FULL bag limit as regulated in years such as this where abundance and wetland prevalence exists.

This years data is in advance of 2017 and very close to 2011 season conditions, both years with high abundance and higher than long term average harvest levels.

It has been a long term concern that even in the best conditions the IHM would not return a full bag full season and this has been borne out by this years result.

**VDHA considers;** Given the current abundance conditions the recommendation from the IHM should be for full legislated season length and full 10 bird bag limit with all species included.



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## Expert Data - *Prowse*

Conservation and Sustainable-Harvest Models for Game Duck Species (Prowse, T., July 2023)

This comprehensive assessment of multiple science methods and data provided from various government departments and expert sources makes for very interesting reading and analysis. His report focuses on 4 primary species, Black Duck, Grey Teal, Chestnut Teal and Wood duck; From Professor Prowse's report he states;

**"The overall goal of this report is to inform sustainable proportional harvest quotas that will not compromise the viability of game duck populations in Victoria or eastern Australia more generally, This report builds on prior work to develop the WCHM, by developing metapopulation models for four game ducks: two highly mobile species (Grey Teal and Pacific Black Duck) and two more sedentary species (Chestnut Teal and Australian Wood Duck) (Ramsey et al. 2010). The models are then used to consider sustainable rates of harvest offtake that could be used to inform a framework for setting the annual recreational harvest regulations. For the purposes of this report, sustainable harvest management is defined as management with the following objective: To maximise the cumulative harvest over a 50-year period, under the constraint that populations are maintained above some minimum population threshold (i.e., some fraction of carrying capacity)."**

His assessment uses available parameters, including what VDHA would argue is very high crippling loss figures, is that;

**"Simulation results for Grey Teal and Wood Duck suggested that long-term mean population size and expected minimum population size (for Victoria and the entire simulated metapopulation) could be maintained above 20 % of carrying capacity for up to (and including) 30 % proportional harvests. Results for Black Duck and Chestnut Teal suggest a more precautionary approach, however, with 30 % harvesting dropping the expected minimum population size in Victoria below 20 % of carrying capacity for these species. Given these results, a precautionary proportional harvest quota of 10 to 20 % is recommended for these species." (Prowse 4.1 Sustainable Harvest Rates)**

What is determined here is that up to 30% of population of Wood Duck and Grey Teal can be harvested without long term effect on the base populations and 20% of Chestnut Teal and Black Duck. Including other species in a similar manner would suggest all species can maintain harvest percentages up to 20% whether a sedentary or highly mobile.



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## Expert Data - *Prowse*

Let's focus on the Wood Duck (Victoria's most populous species) for a moment, and consider the boom that the Wood duck species has experienced for the last 50 years since modern Australian condition has provided perfect conditions for.

**"The other element in here is wood ducks – and I published on this – have certainly been the least affected of perhaps all of the duck species because they have taken over farm dams and golf courses and they breed in all sorts of places that they probably did not breed in in the past. We still believe that in the big systems they have been impacted by the loss of habitat with river regulation, but they are one of the species that are certainly a lot less affected than others."** (Richard Kingsford)

In Victoria, the population explosion of the Wood Duck has created a 2023 population estimate of 2,567,300 over the 2022 Victorian ARI estimate 1,140,100 a 125% increase. This species is the highest abundance recorded of all species. Prevalent of private farm dams, wetlands, lakes, rivers creeks and stream, channels and of course ornamental lakes and golf courses these ducks have become a pest in many places. Agricultural crops are decimated and dams for watering stock turned into bacterial soup from duck droppings by Wood ducks. Given a 10% (ultra conservative) offtake produces 256,730, and that 30% (upper sustainable) is 770,190, the middle (conservative) 20% offtake of wood duck would be 513,460.

Wood duck is commonly the third highest species in harvest alongside Grey Teal and Black Duck, in several of the harvest reports since 2009 it was the highest indicating its consistent high numbers and ongoing resistance to hunting pressure. 2009/10 had 3 additional wood duck per day in the bag limit and was the highest number of birds harvested by species in 2009, 2010, 2014 and is consistently in the top3 harvested species year on year. Its numbers continue to climb and several years of low harvest due to covid and restricted seasonal length have allowed this species to increase to levels not previously recorded.

Prowse's Executive Summary states;

**"Based on the metapopulation simulation results, along with considerable uncertainty regarding species' demography and dispersal, crippling loss rates and the impact of climate change, a precautionary proportional harvest quota of 10 to 20 % is recommended for these species."**

VDHA notes that this harvest percentage scale still includes a high 23% crippling figure, adjustment on newer science may increase the proportional harvest percentage in the future.



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## Expert Data - *Prowse*

The largest harvest in recent records is 600,000 in 2011, and in that year 132,000 wood duck were harvested, or 5% of an ultra-conservative off take on 2023 abundance levels. Wood duck could subsequently be added up to 10 birds a day extra over the seasonal bag limit without affecting base populations and still not affecting the booming Wood duck population.

For all species an ultraconservative offtake of 10% for 2023 produces a harvest of 712,000.

To produce a harvest at this level of approximately 25,000 duck hunters would indicate a bag limit of 12-13 birds per day would be required to achieve that. If a less conservative 15% harvest was used then a harvest of 1,068,000 requires a 15-16 birds per day limit. If 20% conservative harvest is used, then 1,424,000 birds would still be a sustainable harvest. This would be **24 birds per day**.

**VDHA considers;** A sustainable harvest level based on government abundance and expert harvest percentage advice from 10-30% when applied to population abundance and historic harvest levels should be considered when making recommendations to setting bag limits. When levels of abundance are heightened far above averages, that should determine a significant increase in the bag limit. Given the heightened abundance of Wood Duck, these should be subject to an additional bag limit as demonstrated by this year's data up to TEN in addition to either an ultra conservative 10%, conservative 20%, or upper sustainable 30% seasonal bag limit.

## Opening Day Considerations and Exceptions

Given the large quantity of game ducks in Victoria and consideration of % offtake to achieve a harvest that ensures sustainability whilst providing for the hunting community an increase to opening day bag limits is within the scope of the Season Setting Considerations based around total harvest. The highest harvest on recent records is 2011 with 600,000 birds harvested. As per above modelling based on Professor Prowse's expert report certain species can sustain higher offtake than others. To achieve a 15% offtake for the full-length season would require the total bag limit to be lifted to approximately 12-13 birds per day, instead of additional bag limit over the current regulated season it is within the scope to allow for an increased bag limit for the opening TWO days of the season to 15 birds per day whilst retaining the regulated bag limit for the duration of the rest of the season.





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## Opening Day Considerations and Exceptions

Hard working Victorian families look forward to Duck Opening as a major part of the social and family network activities of the year. A Wednesday opening is adverse to successful outcomes as many hard working Victorians cannot access days off in the middle of the week. Whilst this adversely reduces the amount of hunters that can attend it also has other indirect and consequential outcomes, notably management and control of hunting activity, economic considerations and animal welfare implications. Less hunters on Opening day is not the answer to perceived regulatory problems. Anti hunters will claim the cost of managing a weekend opening is an unfair and undue burden on Victorian taxpayers however VDHA considers that those employed as public servants can be managed under usual employment arrangements. Amongst alternatives to the traditional Saturday opening day VDHA would recommend a FRIDAY opening as an alternative to a Wednesday opening date.

**VDHA considers;** An increase to the opening two days seasonal bag limit to 15 birds per person will provide a sustainable outcome that allows harvest level given a super high prevalence of game ducks demonstrated by numerous data sets and sources. Other than a traditional Saturday opening, a Friday opening day is preferential. Additional wood duck for every other day of the season after the Opening two days of the season.

## Human Safety

Human safety and the right to hunt has been established internationally for decades. Hunting and the environment in which it occurs is highly specialised and often dangerous. Allowing any form of harassment or protest by radical anti-hunting protesters around hunters with firearms is highly inflammatory and dangerous. Hunters are also highly disadvantaged in conflict scenarios often presented by radical anti-hunting protesters, as they are highly regulated and law bound to comply with multiple conditions laid down by those laws. The Government does not allow law enforcement or other professions into these situations without a great deal of training and OHS governance. The Human Safety Regulations as applied to hunting need a dramatic overhaul for the Game regulations 2024-2034 re write.

**VDHA considers;** we recognise the existence of the radical animal activism cohort in the state who protest all things involving animals; hunting, racing, animal ownership, breeding, fishing, farming and a myriad of other animal 'causes'. Animal activism is big business and sits in a busy activism space with multiple agencies that creates an ever increasing competition to be more 'activist' than your competitor. We have seen the rise of what was once relatively calm protest behaviour become aggressive, combative and plainly dangerous in this state, as recognised by the recent protections introduced for farming and bio security. Hunting deserves the same protections.

**Danny Ryan | VDHA PR and Politics Officer**





# 2024 Duck Season Submission

## Hunter Behaviour and Enhancement to Compliance

It's recommended a heightened and high tempo response from GMA and partner authorities PRIOR to the season and in particular pro-active compliance activities on Duck Opening Eve.

The GMA should be given advanced lead times to plan and ensure broad access to the hunting community, publication of regulations and information materials in other languages, specific effort should be made weeks in advance in some communities through interaction at regular gatherings and through prominent identities in those communities.

Increased penalties and materials produced to advertise and alert hunters entering SGR's in particular and noted popular hunting areas/towns/cities along with a social media and EMAIL/SMS communication blitz.

GMA should also attend as many hunting organisation-based information sessions as a high priority.

**VDHA considers;** GMA and partner agencies should plan and produce materials specific to assist with compliance activities and engage with hunting stakeholders to work on areas open to enhancement.

## Regulations and Start Times

The WRAP specifically identifies several key areas that hunters should employ in an effort to take game within their capabilities. Several regulation changes over the last few years have actively worked against some of those key areas; late start times in particular are of high concern. Immediate retrieval should be replaced by immediate dispatch and revised emphasis on retrieval thereafter. A full revision of introduced regulations should take place as soon as practicable and assessment of past performances of recently introduced undertaken. Those recently introduced regulations that have had minimal impact on positive outcomes should be disbanded and efforts on key regulatory compliance emphasised.

In order to allow hunters to immediately dispatch game effectively and safely, radical anti-hunting protestors should not be allowed to infringe and harass hunters, including creating wetland disturbance with whistles or flags.



# 2024 Duck Season Submission

## Regulations and Start Times

**VDHA considers;** The start time for the first three days of the season should be closer to sunrise with a 0730h start statewide, and finish time for the first three days at sunset 1930. Subsequent days revert to 30mins before and after sunrise/sunset. Increased compliance effort by partner authorities in regards to dealing with anti-hunter behaviour whilst GMA compliance effort centre around hunter activity.

## Select Committee

VDHA recognises the Select Committee report delivered in August 2023, we respectfully point out that of the committee of 9 participants; 4 formed a majority view whilst 5 members raised minority or dissenting reports.

**Sustainability;** was a large topic and well covered by several Australian and International experts; outcome; hunting has little to no effect on abundance and instead habitat is the key driver.

**Economics;** was a contested topic with the government selected agency RMCG delivering expert and ratified data. Hunters spend money when they hunt. Restrictions and over regulation of season length, bag limit, mid-week start times, over regulation and no policing of anti-hunters leads hunters to become more selective and either;

1. Hunt less or move their hunting activity to other areas,
2. Not hunt at all,
3. Fail to renew licences,
4. Hunt interstate or overseas.

We do know that if hunters don't hunt they don't spend any money or contribute to the economy (especially rural).

**Amenity;** one of the findings from the select committee was there is few if any resources to determine where hunting can take place. Under SHAP2 this falls to the responsibility of DEECA who has developed several versions of an app that shows in real time areas open to hunting, type of hunting. A large amount of duck hunting in particular takes place on Sate Game Reserves, these SGRs were bought and paid for by hunters to ensure the continuation and protection of the environment for game duck and quail. These SGRs are used for hunting for 3 months of the year and are an available resource for all Victorians the other 9 months of the year.



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## Select Committee

**Social wellbeing impact;** hard working Victorian families cherish their outdoor time. It allows participants to unplug and reconnect to nature, engage with family and friends. Numerous studies indicate that hunters and their families lead happier and more contented lives. In times of increasing costs of living and stress hunting provides an escape and also is a source of free-range food to supplement families food sources, particularly relevant in a cost of living crisis.

**Wounding and animal welfare concerns;** The Wounding Reduction Action Plan as an integral part of SHAP2 addresses many aspects of wounding. Hunters are acutely aware of this issue and utilise specialist and expensive resources to attract and entice game into ethical harvesting distances. Equipment and planning also make up an essential part of the hunter's inventory to assist in ethical harvesting with minimal impact on animal welfare.

The last studies into wounding rates were conducted by Norman in the mid to late 1970's when the state had 100,000 duck hunters, seasons started in late February, and the opening bag limit was 20 birds with 10 every other day. Five shot semi-automatic shotguns were prevalent and hunting was undertaken by a wide socioeconomic user range and clay target ranges were not as widespread nor was membership of hunting or target shooting organisations as common as it is today.

Normans studies indicated embedded shot from 6-19% of birds studied, with some years results higher or lower than others.

**"The incidence of lead shotgun pellets in waterfowl (Anatidae and Rallidae) examined in south-eastern Australia between 1957 and 1973."** (Norman FI, 1976, Australian Wildlife Research, 3(1), 61-71)

GMA has over the last two years conducted a wounding rate study with the following results;

**2022**, 596 birds scanned, 3.4% of birds scanned retained pellets.

**2023**, 635 birds scanned, 2.4% of birds scanned retained pellets.

Using the above Government-produced data results as an index it's irrefutable that there has been a massive reduction in wounding over the last 50 years. It is notable that these captured birds that retained pellets were living healthy lives prior to capture and release. Not all wounded birds die or suffer.



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## Select Committee

Some anti-hunting groups claim up to 66% of birds are wounded (down from 75% from a few short years ago), but yet recover so few wounded birds (less than 20 last year), in spite of thousands of man hours searching for them, that the quantity compared to the harvest total is so low its almost incalculable. The RSPCA claim 105,000 birds wounded for the 2022 duck season. Given the tiny number of wounded birds recovered during the course of a duck season such claims show the contempt of the RSPCA show to any statistical and factual data in an effort to increasingly engage in animal activism.

Australian hunters are competent and we hunt in different manners and hunt different birds to our European and American cousins and it's clear wounding, whilst an important issue that requires constant improvement, is no where near as high as either the regulator or especially the anti-hunting movement claims. Even the Victorian RSCPA cannot quite decide itself what the wounding rate is, one moment claiming the wounding rate is 66%, the in 2022 submission to GMA it claims;

**"Therefore, approximately 26% to 45% of birds shot will be wounded, maimed or crippled. This wounding rate is unacceptably high and whilst duck hunting remains lawful, must be reduced as a matter of urgency."**

and the next stating on it's own website that;

**"Until evidence to the contrary is provided, it appears that based on Australian studies, approximately 26% of birds shot will be wounded or maimed/crippled [3]. Of these, approximately 12% will be wounded and survive, and approximately 14% will be maimed/crippled but this could be as high as 33%."** (Norman FI & Powell DGM, 1981, Rates of recovery of bands, harvest patterns and estimates for black duck, chestnut teal, grey teal and mountain duck shot during Victorian open seasons, 1953-77, Australian Wildlife Research, 8(1), 659-664)

Even this last statement from the RSPCA is data from 1981; **42 years ago**. In its submission to the Select Committee, it states 6-40% as taken from the GMA WRAP meetings (note that the GMA has NOT supplied an official figure as it's unknown)

The RSPCA should use some of its extensive Victorian taxpayer funds to buy some new calculators, or better still, refrain from activism and concentrate on animal welfare issues within it's scope.



# 2024 Duck Season Submission

## Select Committee

The CURRENT GMA data suggests significant reduction as above. Hunting organisations and the hunting community support reduction in wounding initiatives and will continue to refine efforts to do so. What is plain and clear from analysis of the current data is that there's been a **reduction of wounding anywhere from 150-691%** (6% to 2.4% or 19% to 2.4%) in the last 40 years.

**VDHA considers;** Much rhetoric about wounding rates is emotive and highly erroneous but is driven by many anti-hunting groups under their agenda, inflated and overquoted numbers designed to instigate and their narrative and false information whilst they fail to produce real-world evidence or any quantity of wounded birds to support their claims. Hunters have improved methods and skills and will further drive down the wounding rate numbers with assistance and consideration from positive regulation and education.

## Sustainable Hunting Action Plan 2

SHAP2 is a Victorian State Labor government plan that follows SHAP1 in investing and improving hunting opportunity for Victorians. This \$5.3M investment over 5 years from 2017-2023 is to deliver key points that will benefit and improve hunting opportunity whilst retaining the Governments policy of "**safe, sustainable and responsible hunting**" for Victorians. Key aspects of this program address many concerns of the Select Committee, but appear to have been overlooked during the evidence and interviews stages conducted by the committee. Key responsibilities rest with several key Government Departments such as DJSIR, DEECA and GMA. Key areas the SHAP2 addresses are; amenity, wounding, where people can hunt, indigenous heritage, and culture.

**VDHA considers;** many points of concern raised by the select committee findings are addressed by ongoing components of SHAP2 which is the responsibility of Government. As a responsible stakeholder of Victorian hunting the VDHA, along with other hunting organisations, continues to stand ready to educate and provide our members with resources, skills and tools to be better hunters and act in a safe, sustainable and responsible manner.





# 2024 Duck Season Submission

## Radical Anti-Hunting Groups

The animal activism space in Victoria is complex and crowded. The truth and facts are often discarded by these groups and is instead replaced by emotive and unsubstantiated rhetoric designed to drive monetary donations to the cause (and hefty CEO pay packets).

Without devoting to much time and effort to these groups who accept NO concessions to ANY hunting, we will touch briefly on the Victorian Parliamentary Committees findings and recommendations on the RSPCA undertaken in 2017.

The committee's report listed three recommendations and three findings:

- **Recommendation 1:** That the Victorian Government and RSPCA Victoria provide more transparency, information, and detail with regard to the powers of RSPCA Victoria inspectors under the Prevention of Cruelty to Animals Act 1986 (POCTA), and in the Memorandum of Understanding (MoU) between RSPCA Victoria and DEDJTR.
- **Recommendation 2:** That RSPCA Victoria ensure that it investigates cruelty to commercial animals in emergency situations only, in line with Division 2 of Part 2A of POCTA.
- **Recommendation 3:** That RSPCA Victoria in consultation with the Victorian Government consider ways to improve engagement and collaboration with animal stakeholder organisations.

**Findings:** The findings focus on the RSPCA Victoria's activism role (Findings 1 and 2) and validates that the RSPCA Victoria uses government funds for inspectorate purposes only (Finding 3).

The Victorian Government response to the Parliamentary Inquiry into RSPCA Victoria was tabled in the Victorian Parliament on 14 February 2018. The Victorian Government supported all recommendations in full.

Similarly, Wildlife Victoria receives millions of taxpayer-funded payments and turns it's resources to animal advocacy and ignores it's very own core responsibilities and charter in order to continue to protest against duck hunting. Politically, these groups are not aligned with any of the major parties and simply don't vote mainstream. Any suggestion that they claim large percentages of the populations support is based off selective or leading polling. The recent Select Committee submission process garnered 10,500 submissions at roughly 45:65 split for and against hunting, debunking claims that 87% of Victorians are opposed to duck hunting.

**VDHA considers;** these anti hunting groups are NOT hunting stakeholders and subsequently should be dismissed from roles and functions with the GMA board, various committees and working groups and any and all submissions received from them ignored.



# 2024 Duck Season Submission

## Further Training and Hunting Continuation

Hunting Stakeholders along with the regulator and Government have a responsible part to play in the continuation of 'safe, sustainable and responsible' hunting .

The select committee provided many variations of further training as did/does participants of the select committee in minority reports (SHAP2 and the WRAP). Some, but not all, of the recommendations or suggestions are viable for a great many reasons. Some organisations also have widely differing views and positions in regard to training, its application, financial gain and method of delivery. Some immediate and fast to implement tools and education materials are available to regulators and Government. In the first instance, VDHA supports education and training over regulation.

The use of webpages for game licence renewals presents an opportunity to introduce a quiz on regulations for hunters, replacing the long cherished and well received Annual Hunting Handbook, that was discontinued due to budget constraints, in a phased renewal process. Similarly, a Waterfowl Identification Test (WIT) refresher, separate from the actual WIT test, could be employed in a phased renewal process, as NSW DPI has adopted.

Compulsory membership of a hunting organisation has also been suggested as a possible provider of training and education continuation, this would require resourcing and alternative languages or interpreter services that hunting organisations do not have immediate access to.

Compulsory certified attendance at a shooting range annually to maintain competency is also an achievable goal in the short term, this would of course require additional resourcing as nearly every shooting range is manned by volunteers and the State does not possess any of its own shooting ranges.

**VDHA considers;** every hunting organisation as a major stakeholder should take part in a joint conference and workgroups to map and plan these management tools. Hunting has extraordinarily **HIGH COMPLIANCE (>99%)**, and onerous and overcomplicated additional regulation will cause hunters to exit. Existing hunters over the age of 65 to be exempt from any new regulations. Hunters must also be assured that complying and new initiatives will result in enhanced hunting opportunity, continuation and support of hunting in Victoria.

## Quail

**VDHA considers;** at preliminary stages, indication of previous 2023 abundance and distribution present no evidence for any restriction or change to the current regulated season length or bag limits.