

Hamilton Field Naturalists Club submission re. Draft ‘Wildlife (Game) Regulations 2024 and Regulatory Impact Statement’

We do NOT support the allowing of duck shooting to begin before sunrise – our experience from many years of waterbird surveys is that it is too difficult to identify species in such poor light. Consequently many mistakes are made and protected species are shot. Shooting should not be allowed before 8 am on ANY day.

We do NOT consider that the opening date should be so early. Many/most migratory waders are still around suitable wetlands in March and should not be harassed at a time when they need to build up body stores for their migration to the Arctic areas. These species are becoming increasingly stressed as a result of loss of feeding areas along their flight routes and cannot afford to start with too little reserves. Why not start the shooting season in mid-April to give the waders a better start? Duck hunting should not take preference over ecological concerns for wildlife. Wetlands that have migratory waders present should be off-limits to hunters until the birds migrate.

We would consider supporting the banning of non-shooters (99.8 % of Victoria’s population) from certain wetlands IF there were a substantial number of proclaimed large sanctuaries where duck hunting is forbidden EVERY year. It is simply not right to allow a tiny minority of people to occupy almost all wetlands in the State for 3 months while either excluding all other people or making it unpleasant/unsafe for them to visit a wetland. The GMA has religiously refused to support such sanctuaries and that is a key source of conflict between duck hunters and the general public. Why should such a minority expect the government to place virtually every wetland at their disposal (excepting town water bodies), excluding tourists, birdwatchers and others who visit those areas? Duck shooters have made it impossible to get within 200 m of ducks at any time of the years on wetlands that are shot over. That is a serious problem for tourists, birdwatchers and the birds.

We would recommend that that duck hunting be restricted to a proclaimed limited number of wetlands – NOT the unlimited and unsupervised hundreds that are presently available ‘as of right’. Why on earth would any responsible authority allow the present situation to continue? For example, why are a tiny minority of people with guns given priority over a host of others with binoculars or cameras?

The proposed hunter licence fees are far too low – they should reflect the cost of administration and education of hunters. In what other sport would such a small fee be charged? For example, golfers could be paying more than \$1000 a year for their sport – which does not involve slaughtering wildlife and costing the community many millions of dollars in government administration. Hunters should be prepared to pay an appropriate fee for their education and ability to recognise duck species – and for game wardens to monitor their activities. The licence fee ought to be a realistic \$200 – one could argue that is also rather low for a pastime that attracts so much support from government.

The statement that mandatory knowledge testing will NOT be part of these regulations is a clear denial of another of the findings of the Senate Committee. It must be part of it, otherwise there will be no improvement in shooter behaviour for another 12 years. The GMA must commit to doing something constructive with that.

We do NOT support the granting of shooting rights for juveniles – that has been a travesty. What could possibly go wrong! Where did this regulation stem from? And why would there be no fee? The adoption of that policy seems to have been a political inducement to get impressionable juveniles

established in the 'sport'. The regulation must be changed to reflect community standards and expectations.

A bag limit of 10 birds/day is far too high, considering the declining abundance of many species. We believe it should not exceed 6, at most.

We do not believe that a 90-day shooting season is appropriate – since so few people are involved, compared with the multitude who also have rights to these wetlands, a season of 60 days is more than adequate. It is also clear that management has no hope (or intention) of managing hunters on the huge number of available wetlands over that period – reduce the season to reduce the problem.

The draft regulations appear to be very supportive of past practices and shows a disinclination to consider any substantial changes to duck hunting. We hope that impression is not a fact and that the committee will take a serious look at reigning in the worst aspects of current duck hunting 'sport'.

Finally, there is a problem that the GMA appears to support the spurious claims of huge economic benefits from duck hunting. There has been no independent study that supports that view. One analysis suggests that it has very little economic benefit at all and may even be negative, since it inflated possible benefits and did not consider all costs, including adversely affecting tourism. The GMA should confine its actions and comments to management matters.

PR Bird

Secretary

Hamilton Field Naturalists Club