



9 February 2022

The Hon. Daniel Andrews
Premier of Victoria
Level 1, 1 Treasury Place East
Melbourne VIC 3002

By email only to: daniel.andrews@parliament.vic.gov.au

Dear Premier,

2022 Victorian duck hunting season

We write on behalf of the Animal Law Institute ('ALI'), a registered charity and a not-for-profit community legal centre dedicated to protecting animals and advocating for their interests through the Australian legal system. ALI is a member of peak bodies including the Victorian Federation of Community Legal Centres and the National Association of Community Legal Centres.

ALI is concerned that the 2022 recreational duck hunting season in Victoria may proceed and wishes to draw to your attention our previous correspondence dated 18 January 2021 (enclosed).

While the 2021 season was affected by restrictions associated with the ongoing COVID-19 pandemic, the concerns communicated in our correspondence are maintained. We request that the Victorian Government consider the significant negative environmental, scientific and animal welfare implications of duck hunting, should the season proceed in 2022, and urge the introduction of an indefinite ban on duck hunting in Victoria due to the unnecessary and inherently cruel nature of this practice.

It is the position of ALI that, despite the release of *Considerations for the 2022 Duck Hunting Season* on 17 December 2021 by the Game Management Authority ('GMA'), and stakeholder consultation, the GMA still fails to protect ducks and wild birds each year by not properly enforcing regulations,¹ prosecuting illegal behaviour and penalising offenders. We confirm that ALI received no communication from the GMA and was not invited to contribute to the stakeholder consultation process.

ALI continues to hold little confidence in the GMA and its ability to enforce and prosecute, which is supported by written evidence referred to in our previous correspondence as well as anecdotally. Whilst changes have been introduced since the release of the *Pegasus Economics Report* in 2017,² in reality, the number of birds being maimed

¹ For example, *Wildlife Regulations 2013* (Vic) and *Wildlife (Game) Regulations 2012* (Vic).

² Roger Fisher and Alistair Davey, Pegasus Economics, *Assessment of the GMA's compliance and enforcement function* (September 2017)

<https://www.gma.vic.gov.au/_data/assets/pdf_file/0011/481682/Assessment-of-the-GMAs-compliance-and.pdf>.



or injured and left to die, and the killing of prohibited wild birds in contravention of the regulations, has decreased as a result of the COVID-19 pandemic and will only continue to decline unless recreational duck hunting is banned in Victoria. Proportionality also must be a key consideration in circumstances where environmental and animal welfare harm is significant, in contrast to the limited number of individuals in Victoria who take part in recreational duck hunting.

We would once again urge the Victorian Government to introduce an indefinite ban on recreational duck hunting in Victoria.

Yours faithfully,

Nicky Neville-Jones

Former Chair of the Animal Law Committee

Law Institute of Victoria

Volunteer Lawyer

The Animal Law Institute

Avishan Bird

Principal Lawyer

The Animal Law Institute