

A close-up photograph of a young deer with large, upright ears, looking directly at the camera. The deer has a brown and tan coat. The background is a blurred forest with green foliage and tree trunks.

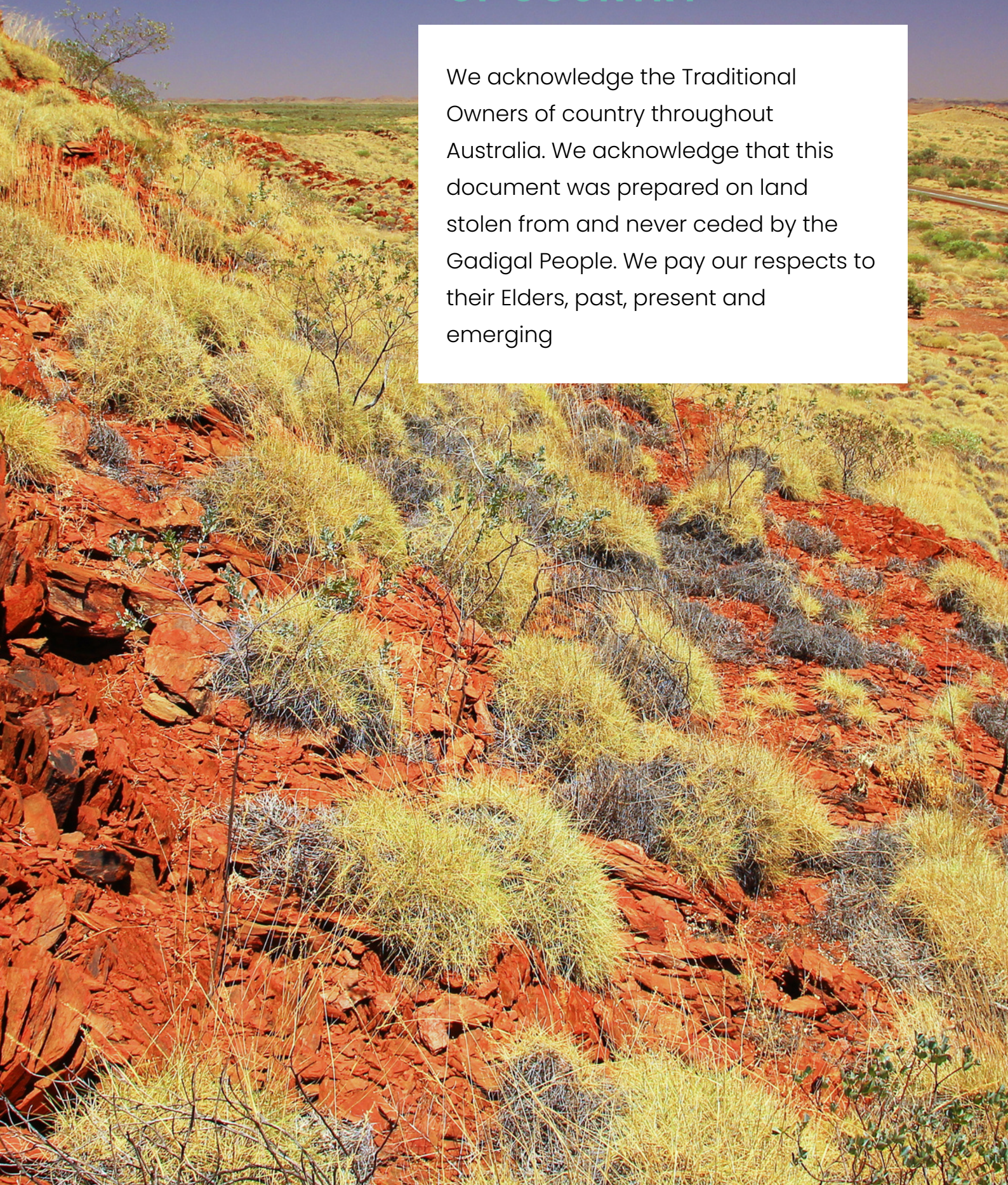
# REMAKING THE GAME AND FERAL ANIMAL CONTROL REGULATION

NSW DEPARTMENT OF PRIMARY INDUSTRIES

AN ANIMAL LIBERATION SUBMISSION

# ACKNOWLEDGEMENT OF COUNTRY

We acknowledge the Traditional Owners of country throughout Australia. We acknowledge that this document was prepared on land stolen from and never ceded by the Gadigal People. We pay our respects to their Elders, past, present and emerging





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12 July 2022

Dear Committee,

**RE: Submission in response to the proposed amendments to the Game and Feral Animal Control Regulation 2022**

Animal Liberation appreciates the opportunity to lodge a formal response to the proposed amendments to the Game and Feral Animal Control Regulations.

Though Animal Liberation strongly opposes all activities that harm animals, including all forms of hunting, we are aware that terminating its practice is currently improbable and is not an objective of the Department. We note that this is in spite of sound scientific evidence demonstrating the serious limitations and adverse outcomes of recreational hunting, including its known impact on the agriculture sector through illegal trespass.

In our consideration of the proposed amendments to the Regulations, Animal Liberation has prepared the following response that is informed by sound contemporary science and contemporary public expectations. We believe this document and our informed response will be of value to the Department.

We request that it be noted from the outset that the following submission is not intended to provide an exhaustive commentary or assessment in response to the proposed amendments, nor the issues contained within the Regulatory Impact Statement provided by the Department. Rather, our submission is intended to provide a general examination and responses to select areas of key concern.

As such, the absence of discussion, consideration or analyses of any particular aspect or component must not be read as or considered to be indicative of consent or acceptance. For the purposes of this submission, Animal Liberation's focus covers aspects that we believe warrant critical attention and response.

# 1. Introduction and background

## 1A. Introduction

In NSW, Regulations are made under the authority of an Act. They set out the administrative details that will operate under an Act. As such, they are a form of delegated legislation. As it applies to the proposed changes to the Game and Feral Animal Control Regulation 2012 ('the GFAC Regulation' or 'the Regulation') currently under consideration, the Act under which they fall is the *Game and Feral Animal Control Act 2002* ('the Act'). Though it is guided by other legislation, including the *Prevention of Cruelty to Animals Act 1989* ('POCTAA') and others, the Regulation supports the primary objectives of the Act.<sup>1</sup> Section 3 of the Act cites these as providing for the effective management of introduced species and the promotion of their responsible and orderly hunting, the Department of Primary Industries ('the Department' or 'DPI') acknowledges in the Regulatory Impact Statement ('RIS') produced in relation to the proposed amendments to the Regulations that the implementation of the Act is intended to ensure human safety, animal welfare standards and the protection of native species.<sup>2</sup> This is an important admission that will be addressed in subsequent sections of this response.

It is our understanding that the Regulation is due for a staged repeal on 1 September 2022 and that the Department has provided, through the published RIS, a number of amendments it intends to include in the remade Regulation.<sup>3</sup> It is also our understanding that the Department is currently in the process of reviewing the Hunter's Code of Practice ('HCOP').<sup>4</sup> While Animal Liberation understands the motivations and rationales informing some of the changes to the existing Regulation, we have serious concerns with many other proposed amendments. The reasons for these concerns, many of which we believe can be appropriately mitigated through the adoption of a number of pertinent recommendations, are provided in Section 3 of this document.

In general, this document will demonstrate that the recreational hunting of wild animals is an inappropriate and ineffective method that cannot achieve the stated objectives of the Act and its Regulation. Additionally, it involves inherent and significant adverse impacts on animal welfare. Finally, we will demonstrate that the stated objectives and the spirit of the Act under which the Regulations are made are inconsistent with the available evidence.

## 1B. Background

Under the Act, hunters in NSW are not required to have a licence to hunt a wide range of species on private property.<sup>5</sup> These species include cats, dogs (other than dingoes), goats, foxes, hares, rabbits, pigs, starlings, mynas, pigeons and deer.<sup>6</sup> The RIS prepared and

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<sup>1</sup> Department of Primary Industries (DPI). 2022a. *Regulatory Impact Statement: Proposed Game and Feral Animal Control Regulation 2022*. Available via [www.haveyoursay.nsw.gov.au/78456/widgets/375803/documents/234953](http://www.haveyoursay.nsw.gov.au/78456/widgets/375803/documents/234953).

<sup>2</sup> Ibid.

<sup>3</sup> Ibid.

<sup>4</sup> Personal correspondence with Amy Warr, Coordinator of Stakeholder Services at DPI Hunting (1 July 2022).

<sup>5</sup> See Schedule 3 of the Act.

<sup>6</sup> Department of Primary Industries (DPI). n.d. Game and pests. Available via [www.dpi.nsw.gov.au/hunting/game-and-pests](http://www.dpi.nsw.gov.au/hunting/game-and-pests).

published by the Department notes there are an estimated 376,665 people who held a recreational hunting or control licence<sup>7</sup>. This figure is based on 2019 figures obtained from an Audit Office of NSW report.<sup>8</sup> Two years earlier, the Game Licensing Unit carried out a review of the economic impact of recreational hunting in NSW. Its final report noted that there were 19,000 recreational game hunting licence holders in NSW at the time, a further 167,000 hunters who held a firearms licence but not a game hunting licence, and an estimated 40,000 hunters who were permitted to hunt on private land without a firearm.<sup>9</sup> If these figures are combined, they total 226,000. The RIS acknowledges that “these numbers infer that a large number of people who hunt in NSW do not hold a NSW Game Hunting Licence”.<sup>10</sup>

These substantial figures provide insight into the practical limitations relating to oversight and compliance under the Act and Regulation. Far more - over 160,000 people - hold firearms licences and not hunting licences.<sup>11</sup> Many of these people kill animals listed in Schedule 3 of the Act on private land. As such, a significant proportion of people who hunt in NSW do not hold a NSW Game Hunting Licence.<sup>12</sup>

Recreational hunting of the kind practised under the Regulations refers to hunting activities conducted for personal enjoyment.<sup>13</sup> In line with evolving community attitudes towards animal welfare that we will demonstrate in the following subsection, the practice of recreational hunting has become increasingly regarded as unjustifiable<sup>14</sup>. In fact, lobby groups that represent the interest of recreational hunters are described as “notoriously suspicious of animal welfare scrutiny”.<sup>15</sup> This distrust can extend to government authorities. For example, a former senior analyst at the Game Council of NSW erroneously claimed in a written submission to an inquiry into the potential environmental contribution of recreational hunting in Western Australia that opposition to the practice is “based largely on ignorance and misinformation”.<sup>16</sup> Though others are more measured in their rhetoric, often claiming that recreational hunting is practical but not capable of achieving the objectives of the Act<sup>17</sup>, we

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<sup>7</sup> Department of Primary Industries (DPI). 2022a. *Regulatory Impact Statement: Proposed Game and Feral Animal Control Regulation 2022*. Available via [www.haveyoursay.nsw.gov.au/78456/widgets/375803/documents/234953](http://www.haveyoursay.nsw.gov.au/78456/widgets/375803/documents/234953).

<sup>8</sup> Audit Office of NSW. 2019. *Firearms Regulation: NSW Auditor General's Report*. Sydney: Audit Office of NSW

<sup>9</sup> Department of Primary Industries (DPI). 2017. *Economic Impact of Recreational Hunting in NSW: Final Report*. Available via [www.dpi.nsw.gov.au/\\_data/assets/pdf\\_file/0007/723454/economic-impact-of-recreational-hunting-in-nsw.pdf](http://www.dpi.nsw.gov.au/_data/assets/pdf_file/0007/723454/economic-impact-of-recreational-hunting-in-nsw.pdf).

<sup>10</sup> Department of Primary Industries (DPI). 2022a. *Regulatory Impact Statement: Proposed Game and Feral Animal Control Regulation 2022*. Available via [www.haveyoursay.nsw.gov.au/78456/widgets/375803/documents/234953](http://www.haveyoursay.nsw.gov.au/78456/widgets/375803/documents/234953).

<sup>11</sup> *ibid.*

<sup>12</sup> *ibid.*

<sup>13</sup> Loveridge, A., Reynolds, J. and Milner-Gulland, E. 2006. Does sport hunting benefit conservation? In D. Macdonald and K. Service (Eds.), *Key Topics in Conservation Biology*. Hoboken: Blackwell Publishing; Bengsen, A. and Sparkes, J. 2016. Can recreational hunting contribute to pest mammal control on public land in Australia? *Mammal review*, 46(4): 297-310; Di Minin, E., Clements, H., Correia, R., Cortés-Capano, G., Fink, C., Haukka, A., Hausmann, A., Kulkarni, R. and Bradshaw, C. 2021. Consequences of recreational hunting for biodiversity conservation and livelihoods. *One Earth*, 4(2): 238-253.

<sup>14</sup> Dellinger, M. 2019. Trophy hunting: a relic of the past. *Journal of Environmental Law and Litigation*, 34: 25-59; Vucetich, J., Burnham, D., Johnson, P., Loveridge, A., Nelson, M., Bruskotter, J. and Macdonald, D. 2019. The value of argument analysis for understanding ethical considerations pertaining to trophy hunting and lion conservation. *Biological Conservation*, 235: 260-272.

<sup>15</sup> Hampton, J. and Hyndman, T. 2019. Underaddressed animal-welfare issues in conservation. *Conservation Biology*, 33(4): 803-811.

<sup>16</sup> Larsson, S. 2015. Submission to the inquiry into the potential environmental contribution of recreational hunting systems in Western Australia. Available via [www.parliament.wa.gov.au/Parliament/commit.nsf/lulnquiryPublicSubmissions/84D4F85F4BC407F748257CDA0002EB3A/\\$file/pc.rhs.140328.sub.298.Larsson.pdf](http://www.parliament.wa.gov.au/Parliament/commit.nsf/lulnquiryPublicSubmissions/84D4F85F4BC407F748257CDA0002EB3A/$file/pc.rhs.140328.sub.298.Larsson.pdf).

<sup>17</sup> Hogan, H. 2021. Hunting shown to contribute more to the economy than the wool industry in NSW. *ABC News*, 1 July.

will demonstrate the falsity of such claims and show that such antagonism stems from the fact that recreational hunting inherently causes significant adverse welfare impacts.<sup>18</sup>

## Animal welfare

The last two decades have seen increased public concern regarding animal welfare issues. Though this is particularly pronounced in relation to farmed animal welfare<sup>19</sup>, attention and concern for animal welfare in conservation and wildlife management has also markedly increased in recent years.<sup>20</sup> For relevant legislation to continue to reflect social expectations, it must be subject to corresponding improvements.

As it applies to recreational hunting, this should include a large cohort of autonomous experts overseeing the gamut of animal welfare issues and providing independent reports on relevant industries and contexts.<sup>21</sup> In practice, however, scrutiny of animal welfare arises largely from non-governmental animal protection organisations ('APOs') and government-funded departments whose remit often includes assessing or regulating the practices they simultaneously promote. This has been noted in recent inquiries into animal welfare policy in New South Wales. The first report of the Standing Committee on State Development, published in June 2022, acknowledged that stakeholders to its inquiry highlighted the intrinsic conflict of interest in the existing framework (i.e., that the Department is directed to simultaneously promote industries that profit from the use of animals while also protecting animal welfare).<sup>22</sup>

Many APOs, including Animal Liberation<sup>23</sup>, have advocated for the creation of an independent office of animal welfare on the basis that the Department and the Minister for Agriculture operate under an inherent conflict of interest arising from having incompatible responsibilities within their portfolio.<sup>24</sup> As it applies to recreational hunting, consider the Commonwealth's National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes and the RSPCA's position that the industry is poorly policed and enforced.<sup>25</sup> This demonstrates the practical inconsistencies and limitations that arise under such a framework.

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<sup>18</sup> RSPCA Australia. 2017. *Recreational Hunting and Animal Welfare*. Available via

<https://kb.rspca.org.au/wp-content/uploads/2018/11/Recreational-hunting-RSPCA-Information-Paper-Dec-2017.pdf>.

<sup>19</sup> Bennett, R. and Blaney, R. 2003. Estimating the benefits of farm animal welfare legislation using the contingent valuation method. *Agricultural Economics*, 29; 85-98; Taylor, N. and Signal, T. 2009. Lock 'em up and throw away the key? Community opinions regarding current animal abuse penalties. *Australian Animal Protection Law Journal*, 3: 33-52; Futureye. 2018. *Commodity or Sentient Being? Australia's Shifting Mindset on Farm Animal Welfare*. Windsor: Futureye Pty. Ltd.; McGreevy, P., Cornish, A. and Jones, B. 2019. Not just activists, 9 out of 10 people are concerned about animal welfare in Australian farming. *The Conversation*, 15 May.

<sup>20</sup> Dubois, S., Fenwick, N., Ryan, E., Baker, L., Baker, S., Beausoleil, N., Carter, S., Cartwright, B., Costa, F., Draper, C., Griffin, J., Grogan, A., Howald, G., Jones, B., Littin, K., Lombard, A., Mellor, D., Ramp, d., Schuppli, C. and Fraser, D. 2017. International consensus principles for ethical wildlife control. *Conservation Biology*, 31: 753-760.

<sup>21</sup> Hampton, J. and Hyndman, T. 2019. Underaddressed animal-welfare issues in conservation. *Conservation Biology*, 33(4): 803-811.

<sup>22</sup> Standing Committee on State Development. 2022. *Animal Welfare Policy in New South Wales: First Report*. Available via <https://www.parliament.nsw.gov.au/committees/inquiries/Pages/inquiry-details.aspx?pk=2853#tab-reportsandgovernmentresponses>.

<sup>23</sup> Animal Liberation. 2022. Submission to the State Development Committee's inquiry into animal welfare policy in New South Wales. Available via [www.parliament.nsw.gov.au/lcdocs/submissions/77961/0252%20Animal%20Liberation.pdf](http://www.parliament.nsw.gov.au/lcdocs/submissions/77961/0252%20Animal%20Liberation.pdf).

<sup>24</sup> Standing Committee on State Development. 2022. *Animal Welfare Policy in New South Wales: First Report*. Available via <https://www.parliament.nsw.gov.au/committees/inquiries/Pages/inquiry-details.aspx?pk=2853#tab-reportsandgovernmentresponses>.

<sup>25</sup> RSPCA Australia. 2020. What is the difference between non-commercial and commercial kangaroo shooting. Available via <https://kb.rspca.org.au/knowledge-base/what-is-the-difference-between-non-commercial-and-commercial-kangaroo-shooting/>.

Ultimately, this flawed regulatory structure has caused several important animal welfare issues to have “fallen through the cracks”<sup>26</sup>, despite the above demonstrating the maturation of animal welfare as a key social issue in Australia.<sup>27</sup> Available evidence suggests that the welfare of introduced wild animals in NSW is one of these issues.<sup>28</sup>

## Animal welfare and recreational hunting

Animals can be pursued, sometimes to the point of exhaustion, only to be killed using techniques that do not ensure a prompt death.<sup>29</sup> As such, these methods are often regarded as imposing unacceptable animal welfare impacts.<sup>30</sup> Recreational hunting techniques often include bowhunting, the use of various firearms, pursuit through the use of dogs (“pig dogging”) and the use of knives as a killing method for when pigs are caught. Many adverse animal welfare impacts associated with these techniques are caused by non-fatal wounding.<sup>31</sup> In some species, the recorded rate of non-fatal wounding exceeds 25%.<sup>32</sup> In addition, the RSPCA note that while some hunters may have the ability, proficiency and motivation to minimise the suffering they cause, many do not.<sup>33</sup> It is unavoidable that some animals will experience profound and prolonged pain in the process. For these reasons, RSPCA Australia is opposed to the recreational hunting of any animal.<sup>34</sup> It is important to note that in the absence of any information that accurately and transparently quantifies the animal welfare outcomes of the hunting methods, any efforts to ethically justify their continued use is insufficient.<sup>35</sup>

Hunting impacts more animals than those targeted, killed or wounded by firearms, arrows, knives or hunting dogs.<sup>36</sup> It has a significant adverse impact on other animals, such as dependent young who are orphaned or displaced by hunters.<sup>37</sup> If hunters do not locate and kill these orphans, they are vulnerable to starvation, dehydration or predation.<sup>38</sup> Maternal

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<sup>26</sup> Cattet, M. 2013. Falling through the cracks: shortcomings in the collaboration between biologists and veterinarians and their consequences for wildlife. *Institute for Laboratory Animal Research Journal*, 54: 33-40.

<sup>27</sup> Futureye. 2018. *Commodity or Sentient Being? Australia's Shifting Mindset on Farm Animal Welfare*. Windsor: Futureye Pty. Ltd.; Animal Liberation. 2022. Submission to the State Development Committee's inquiry into animal welfare policy in New South Wales. Available via [www.parliament.nsw.gov.au/lcdocs/submissions/77961/0252%20Animal%20Liberation.pdf](http://www.parliament.nsw.gov.au/lcdocs/submissions/77961/0252%20Animal%20Liberation.pdf).

<sup>28</sup> Thiriet, D. 2007. In the spotlight: the welfare of introduced wild animals in Australia. *Environmental and Planning Law Journal*, 24(60): 417-426.

<sup>29</sup> RSPCA Australia. 2019. What is the RSPCA's view on recreational hunting? Available via <https://kb.rspca.org.au/knowledge-base/what-is-the-rspcas-view-on-recreational-hunting>.

<sup>30</sup> Sharp, T. and Saunders, G. 2011. *A Model for Assessing the Relative Humaneness of Pest Animal Control Methods*. Canberra: Invasive Animals CRC.

<sup>31</sup> Hampton, J. and Hyndman, T. 2019. Underaddressed animal-welfare issues in conservation. *Conservation Biology*, 33(4): 803-811.

<sup>32</sup> Nixon, C., Hansen, L., Brewer, P., Chelsvig, J., Esker, T., Etter, D., Sullivan, J., Koerkenmeier, R. and Mankin, P. 2001. Survival of white-tailed deer in intensively farmed areas of Illinois. *Canadian Journal of Zoology*, 79: 581-588; RSPCA Australia.

2020. How many ducks and quail are wounded due to recreational hunting? Available via <https://kb.rspca.org.au/knowledge-base/how-many-ducks-and-quail-are-wounded-due-to-recreational-hunting>.

<sup>33</sup> RSPCA Australia. 2017. *Recreational Hunting and Animal Welfare*. Available via <https://kb.rspca.org.au/wp-content/uploads/2018/11/Recreational-hunting-RSPCA-Information-Paper-Dec-2017.pdf>.

<sup>34</sup> RSPCA Australia. 2016. Policy C10: Hunting of animals for sport. Available via <https://kb.rspca.org.au/knowledge-base/rspca-policy-c10-hunting-of-animals-for-sport>.

<sup>35</sup> Hampton, J. and Hyndman, T. 2019. Underaddressed animal-welfare issues in conservation. *Conservation Biology*, 33(4): 803-811.

<sup>36</sup> RSPCA Australia. 2017. *Recreational Hunting and Animal Welfare*. Available via <https://kb.rspca.org.au/wp-content/uploads/2018/11/Recreational-hunting-RSPCA-Information-Paper-Dec-2017.pdf>

<sup>37</sup> RSPCA Australia. 2019. How does hunting affect non-target animals? Available via <https://kb.rspca.org.au/knowledge-base/how-does-hunting-affect-non-target-animals>.

<sup>38</sup> RSPCA Australia. 2017. *Recreational Hunting and Animal Welfare*. Available via <https://kb.rspca.org.au/wp-content/uploads/2018/11/Recreational-hunting-RSPCA-Information-Paper-Dec-2017.pdf>.



deprivation is a significant stressor in many species.<sup>39</sup> Even if orphaned animals survive the initial stress caused by the sudden loss of their parental caregivers, changes in their physiology and behaviour can have a harmful effect on their subsequent development.<sup>40</sup>

It is legal under NSW law to use dogs in the hunting of some species, including birds and pigs.<sup>41</sup> There are over 180 NSW State forests in which people can hunt pigs with dogs during the day.<sup>42</sup> That there has been increasing awareness of some effects domestic dogs have on wildlife<sup>43</sup> demonstrates that it is inconsistent with contemporary expectations not to extend this scrutiny to the use of dogs in hunting.<sup>44</sup> Like other hunting methods<sup>45</sup>, the use of dogs has often been justified on the grounds of traditionalism (i.e., that it is a conventional practice that should be exempt from scrutiny).<sup>46</sup> It is important to acknowledge that the majority of ethical systems do not provide defences for activities on the basis that they are standard or conventional.<sup>47</sup>

Critically, existing regulatory and enforcement regimes do not prevent suffering from occurring. As we have shown, the Department acknowledges that “a large number of people who hunt in NSW do not hold a NSW Game Hunting Licence”.<sup>48</sup> Given the figures cited by the Department are estimates, it is impossible for comprehensive compliance measures to be undertaken to ensure that each hunter is adhering to the Code of Practice. Legislative and policy mechanisms, including regulatory regimes, are inappropriately or ineffectively implemented. There is a range of reasons for this, including both a lack of resources and enthusiasm for compliance measures<sup>49</sup>. When these factors are combined, the results necessarily translate into minimal regulatory oversight.

Though Animal Liberation has serious ethical concerns about the practice of hunting that are amplified by the limited capacity of regulatory authorities to ensure adequate oversight and compliance, these concerns also extend to the impacts this practice has on the health and welfare of the environment and humans.<sup>50</sup> When the minimal practical impact hunting has on

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<sup>39</sup> Gee, D., Gabard-Durnam, L., Flannery, J., Goff, B., Humphreys, K., Telzer, E., Hare, T., Bookheimer, S. and Tottenham, N. 2013. Early developmental emergence of human amygdala-prefrontal connectivity after maternal deprivation. *Proceedings of the National Academy of Sciences of the United States of America*, 110(39): 15638-15643.

<sup>40</sup> Latham, N. and Mason, G. 2008. Maternal deprivation and the development of stereotypic behaviour. *Applied Animal Behaviour Science*, 110: 84-108; RSPCA Australia. 2017. *Recreational Hunting and Animal Welfare*. Available via <https://kb.rspca.org.au/wp-content/uploads/2018/11/Recreational-hunting-RSPCA-Information-Paper-Dec-2017.pdf>; Rizzolo, J. and Bradshaw, G. 2019. Nonhuman animal nations: transforming conservation into wildlife self-determination. *Society and Animals*, 29(4): 393-413.

<sup>41</sup> Department of Primary Industries (DPI). n.d. Rules and regulations. Available via [www.dpi.nsw.gov.au/hunting/rules-and-regulations](http://www.dpi.nsw.gov.au/hunting/rules-and-regulations).

<sup>42</sup> Department of Primary Industries (DPI). n.d. Be a responsible pig dogger. Available via [www.dpi.nsw.gov.au/hunting/game-and-pests/be-a-responsible-pig-dogger](http://www.dpi.nsw.gov.au/hunting/game-and-pests/be-a-responsible-pig-dogger).

<sup>43</sup> Hughes, J. and Macdonald, D. 2013. A review of the interactions between free-roaming domestic dogs and wildlife. *Biological Conservation*, 157: 341-351; Doherty, T., Dickman, C., Glen, A., Newsome, T., Nimmo, D., Ritchie, E., Vanak, A. and Wirsing, A. 2017. The global impacts of domestic dogs on threatened vertebrates. *Biological Conservation*, 210: 56-59; Twardek, W., Peiman, K., Gallagher, A. and Cooke, S. 2017. Fido, Fluffy, and wildlife conservation: the environmental consequences of domesticated animals. *Environmental Reviews*, 25: 381-395.

<sup>44</sup> van Eeden, L., Dickman, C., Ritchie, E. and Newsome, T. 2017. Shifting public values and what they mean for increasing democracy in wildlife management decisions. *Biodiversity and Conservation*, 26: 2759-2763.

<sup>45</sup> Gregory, N. 2005. Bowhunting deer. *Animal Welfare*, 14: 111-116.

<sup>46</sup> Bateson, P. and Bradshaw, E. 1997. Physiological effects of hunting red deer (*Cervus elaphus*). *Proceedings of the Royal Society of London B: Biological Sciences*, 264: 1707-1714.

<sup>47</sup> Iossa, G., Soulsbury, C. and Harris, S. 2007. Mammal trapping: a review of animal welfare standards of killing and restraining traps. *Animal Welfare*, 16: 335-352.

<sup>48</sup> Department of Primary Industries (DPI). 2022a. *Regulatory Impact Statement: Proposed Game and Feral Animal Control Regulation 2022*. Available via [www.haveyoursay.nsw.gov.au/78456/widgets/375803/documents/234953](http://www.haveyoursay.nsw.gov.au/78456/widgets/375803/documents/234953).

<sup>49</sup> Senate Environment and Communications Reference Committee. 2021. *Impact of Feral Deer, Pigs and Goats in Australia: Final Report*. Canberra: Commonwealth of Australia.

<sup>50</sup> *ibid.*

the populations of unwanted wild animals is considered, the function of hunting becomes clear; it is purely for entertainment. We will show that this is in opposition to the stated objectives of the Act.

## The role of regulation

Over the past two decades, state governments across the country have enacted reforms to processes explicitly designed at streamlining and simplifying regulatory frameworks.<sup>51</sup> Broadly, these have been characterised as efforts to “cut red tape”, principally in order to make the system more accessible to increased investment. We note, for instance, that the NSW hunting industry has often called for reduced red tape.<sup>52</sup> This is often supported by other supportive organisations who lobby the state government for beneficial regulatory changes on behalf of the hunting industry.<sup>53</sup> However, even in instances where this lobbying has achieved some beneficial results for the industry, proponents continue to seek additional changes to the regulatory regime.<sup>54</sup>

The rhetoric of “cutting” or “reducing red tape” is explicitly referred to at various points by the Department in relation to the proposed amendments to the existing Regulations. For example, the Department’s community consultation portal identifies its intention, through the proposed amendments, to “reduce red tape” and “streamline processes”.<sup>55</sup> Similarly, the RIS notes that its proposed amendment that would lower the age persons are required to be supervised by adults from 18 to 16 will assist in “reducing red tape”.<sup>56</sup> Finally, the proposal to increase the maximum licence duration from 5 to 10 years<sup>57</sup> is similarly framed in the summary of changes document produced and published by the Department as an “opportunity to reduce red tape”.<sup>58</sup> As such, we have identified a similar impetus as being behind the proposed amendments. Though this is not unique to a particular sector, the present reforms represent a significant attempt to drastically remove obstacles to hunting by adopting provisions beneficial to its proponents. This can be identified in each of the proposed amendments outlined above.

As in other sectors, however, the democratic principles that underlie community engagement have arguably been misrepresented by the Department in relation to the proposed amendments to the Regulation. Other Departments, for example, have historically published reports expressly intended to act as guides for engaging the community in planning and

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<sup>51</sup> Dunn, K., McGuirk, P., Piracha, A., Pelleri, D., Maginn, P., Buxton, M. and Phibbs, P. 2009. What do publics want from the planning system? In P. Maginn, R. Jones and F. McKenzie (Eds.), *State of Australian Cities Conference: Refereed Proceedings*.

<sup>52</sup> Gibson, M. 2017. Red tape from Greens stops NSW shooters from culling roos. Available via [www.sportingshooter.com.au/news/red-tape-from-greens-stops-nsw-shooters-from-culling-roos](http://www.sportingshooter.com.au/news/red-tape-from-greens-stops-nsw-shooters-from-culling-roos); Green, S. 2019. Red tape surrounding feral deer problem needs to be cut to beat growing problem. *The Glen Innes Examiner*, 15 July.

<sup>53</sup> Invasive Species Council. 2019a. Move will allow NSW farmers to tackle growing feral deer problem. Available via [www.invasives.org.au/media-releases/nsw-farmers-freed-to-tackle-feral-deer](http://www.invasives.org.au/media-releases/nsw-farmers-freed-to-tackle-feral-deer); Invasive Species Council. 2019b. NSW Government will remove special protection status for feral deer. Available via <https://bit.ly/3NVb1NW>; Tisdall, L. 2019. NSW Government removes game status of feral deer. *Port News*, 25 August.

<sup>54</sup> Condon, M., Maunder, S., Claughton, D. and Lauder, S. 2018. Deer hunting restrictions relaxed in NSW, but more red tape needs to go, farmers say. *ABC News*, 19 November.

<sup>55</sup> Department of Primary Industries (DPI). 2022b. Remaking the Game and Feral Animal Control Regulation. Available via [www.haveyoursay.nsw.gov.au/dpi-regulation-changes](http://www.haveyoursay.nsw.gov.au/dpi-regulation-changes).

<sup>56</sup> Department of Primary Industries (DPI). 2022a. *Regulatory Impact Statement: Proposed Game and Feral Animal Control Regulation 2022*. Available via [www.haveyoursay.nsw.gov.au/78456/widgets/375803/documents/234953](http://www.haveyoursay.nsw.gov.au/78456/widgets/375803/documents/234953).

<sup>57</sup> See section 15 of the current Regulations and section 13 of the draft Regulations.

<sup>58</sup> Department of Primary Industries (DPI). 2022c. Summary of changes and context: proposed Game and Feral Animal Control Regulation 2022. Available via <https://bit.ly/3c6UkDf>.

decision-making processes. Such documents have acknowledged that the community plays an important role in this process and, as a result, has triggered the development of approaches to “foster public participation in planning and decision-making” so that departments “actively listen to the knowledge and ideas of community members”.<sup>59</sup> However, these important democratic principles have increasingly undergone a metamorphosis. Community consultation has been critiqued as “public relations” exercises intended to steer public opinion, particularly in order to provide the pretence of open dialogue and democracy.<sup>60</sup> Given the impetus and influence of special interest or lobby groups behind the proposed amendments to the Regulations, it is reasonable to believe that the present consultation process represents the machinations outlined above. Despite this, we expect this submission and its contents to be duly considered and incorporated in the forthcoming report relating to the proposed amendments.

The RIS identifies stakeholders with whom the Department consulted prior to the publication of the proposed amendments to the Regulation.<sup>61</sup> “Direct stakeholders” include current and prospective licence holders, the Game and Pest Management Advisory Board, the NSW Hunting Stakeholder Consultation Group and firearms licence holders. Other consulted stakeholders include various representatives and organisations of the hunting industry. None of the stakeholders cited in the RIS has responsibility or interest in animal welfare, regulatory or otherwise.

We have shown that many industries and activities that use or harm wild animals are facing increasing criticism from the public and a range of APOs. In some cases, widespread community opposition has led to industries losing market access or regulatory approval.<sup>62</sup> Increased community concern for animal welfare has generated a corresponding rise in public pressure. This has been demonstrated by the recent series of inquiries into animal welfare policy and legislation in NSW.<sup>63</sup> The role of social change can also be seen in policy changes relating to specific practices or industries. The 2015 live baiting scandal, for example, triggered the temporary banning of greyhound racing in NSW.<sup>64</sup> Similar regulatory changes have arisen due to social pressure following the exposure of certain industry practices.<sup>65</sup> These examples demonstrate increasing political awareness that these practices can rapidly lose their social licence due to community pressure and increasing public awareness of animal welfare issues.<sup>66</sup>

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<sup>59</sup> Department of Environment and Conservation. 2006. *A Guide for Engaging Communities in Environmental Planning and Decision Making*. Sydney: NSW Government Department of Environment and Conservation.

<sup>60</sup> Beder, S. 1999. Public participation or public relations? In B. Martin (Ed.), *Technology and Public Participation*. Wollongong: University of Wollongong.

<sup>61</sup> Department of Primary Industries (DPI). 2022a. *Regulatory Impact Statement: Proposed Game and Feral Animal Control Regulation 2022*. Available via [www.haveyoursay.nsw.gov.au/78456/widgets/375803/documents/234953](http://www.haveyoursay.nsw.gov.au/78456/widgets/375803/documents/234953).

<sup>62</sup> Hampton, J. and Teh-White, K. 2019. Animal welfare, social license and wildlife use industries. *Journal of Wildlife Management*, 83(1): 12-21.

<sup>63</sup> Animal Liberation. 2022. Submission to the State Development Committee's inquiry into animal welfare policy in New South Wales. Available via [www.parliament.nsw.gov.au/lcdocs/submissions/77961/0252%20Animal%20Liberation.pdf](http://www.parliament.nsw.gov.au/lcdocs/submissions/77961/0252%20Animal%20Liberation.pdf).

<sup>64</sup> White, A. and Godfrey, M. 2016. NSW greyhound racing industry to be shut down from 2016. *The Daily Telegraph*, 7 July; Slezak, M. 2016. Mike Baird confirms backflip on greyhound racing ban in NSW. *The Guardian*, 11 October.

<sup>65</sup> Animal Liberation. 2022. Submission to the State Development Committee's inquiry into animal welfare policy in New South Wales. Available via [www.parliament.nsw.gov.au/lcdocs/submissions/77961/0252%20Animal%20Liberation.pdf](http://www.parliament.nsw.gov.au/lcdocs/submissions/77961/0252%20Animal%20Liberation.pdf).

<sup>66</sup> Teh-White, K. 2017. Greyhounds increase social licence risk. *International Animal Health Journal*, 4: 26-29; Duncan, E., Graham, R. and McManus, P. 2018. 'No one has even seen... smelt... or sensed a social licence': animal geographies and social licence to operate. *Geoforum*, 96: 318-327; Hampton, J., Jones, B. and McGreevy, P. 2020. Social licence and animal welfare: developments from the past decade in Australia. *Animals*, 10: 2237.

With increasing attention on both animal welfare and the human dimensions of wildlife management, wildlife managers must similarly engage with different views of how animals should be treated if practices are to retain public support.<sup>67</sup> As such, government departments are increasingly influenced by the concept of a social licence. This describes the community's tacit consent for a business, industry, project or activity to exist or continue to exist.<sup>68</sup> As such, it reflects prevailing public values and social expectations.<sup>69</sup> Many contemporary conservation activities typically benefit from high levels of public support. However, lethal management activities, such as hunting, have experienced declining social support.<sup>70</sup> Understanding the range of social expectations relating to the use and treatment of wildlife is therefore of critical importance.<sup>71</sup>

To improve understanding and management of these human dimensions, derived as they are from rising concerns for animal welfare, community engagement processes in which stakeholders expect and are provided with opportunities for input and involvement have become commonplace.<sup>72</sup> Doing so provides a pathway to guide practices in a way that aligns with emerging social values.<sup>73</sup> It also enables the resolution of disputes while assisting in the formulation of future management decisions.<sup>74</sup> For example, governments should be attentive to changing social values because what was once regarded as normal or acceptable can change over time, creating a gap between these practices and community expectations.<sup>75</sup> For example, the commercial Australian kangaroo industry voluntarily shifted from targeting all adult kangaroos to males only.<sup>76</sup> This change was made to acknowledge increasing public concern regarding the killing of orphaned joeys after their mothers were shot.<sup>77</sup>

In sum, engaging a diverse range of stakeholders is a critical component of community engagement. It is essential to understanding the human dimensions of contentious activities involving wildlife and is necessary for current practices to retain their social licence.<sup>78</sup> It is apparent, however, that this has been largely absent from the current reform process.

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<sup>67</sup> Lunney, D. 2012. Wildlife management and the debate on the ethics of animal use. I. Decisions within a State wildlife agency. *Pacific Conservation Biology*, 18: 5-21.

<sup>68</sup> Widmar, N., Morgan, C. and Croney, C. 2018. Perceptions of social responsibility of prominent animal welfare groups. *Journal of Applied Animal Welfare Science*, 21: 27-39.

<sup>69</sup> Hampton, J. and Teh-White, K. 2019. Animal welfare, social license and wildlife use industries. *Journal of Wildlife Management*, 83(1): 12-21.

<sup>70</sup> Muth, R. and Jamison, W. 2000. On the destiny of deer camps and duck blinds: the rise of the animal rights movement and the future of wildlife conservation. *Wildlife Society Bulletin*, 28: 841-851.

<sup>71</sup> Hampton, J. and Teh-White, K. 2019. Animal welfare, social license and wildlife use industries. *Journal of Wildlife Management*, 83(1): 12-21.

<sup>72</sup> Decker, D., Forstchen, A., Pomeranz, E., Smith, C., Riley, S., Jacobson, C., Organ, J. and Batcheller, G. 2015. Stakeholder engagement in wildlife management: does the public trust doctrine imply limits? *Journal of Wildlife Management*, 79: 174-179.

<sup>73</sup> Hampton, J. and Teh-White, K. 2019. Animal welfare, social license and wildlife use industries. *Journal of Wildlife Management*, 83(1): 12-21.

<sup>74</sup> Urbanek, R., Nielsen, C., Davenport, M. and Woodson, B. 2015. Perceived and desired outcomes of suburban deer management methods. *Journal of Wildlife Management*, 79: 647-661.

<sup>75</sup> Teh-White, K. 2017. Greyhounds increase social licence risk. *International Animal Health Journal*, 4: 26-29.

<sup>76</sup> Borda, R. 2016. Why a male only harvest of kangaroos? Conservation Through Sustainable Use of Wildlife Conference. 30 August–1 September 2016, Brisbane, Queensland.

<sup>77</sup> McLeod, S. R., and Sharp, T. 2014. *Improving the Humaneness of Commercial Kangaroo Harvesting*. Canberra: Rural Industries Research and Development Corporation.

<sup>78</sup> Hampton, J. and Teh-White, K. 2019. Animal welfare, social license and wildlife use industries. *Journal of Wildlife Management*, 83(1): 12-21.

## Recreational hunting is ineffective

Though hunting advocacy groups have been successful at lobbying state governments to create policies beneficial to the interests of their proponents, recreational hunting is not an effective technique to control unwanted species of wildlife.<sup>79</sup> This conclusion is supported by the findings of recent Commonwealth inquiries. In May 2021, the Senate Environment and Communications References Committee published its final report on the impact of deer, pigs and goats in Australia. It concluded that “the overwhelming evidence to the committee was that recreational hunting is not an effective control measure as the numbers removed are too low to have an effect”.<sup>80</sup> This conclusion is further supported by the fact that most recreational hunting is ad-hoc, lacks a defined objective, often involves little to no planning and is not subject to monitoring or efficacy assessments.<sup>81</sup> Many of the methods used are labour intensive, expensive and not effective in reducing populations over large areas or for the long term.<sup>82</sup>

Recreational hunting is often regarded by its proponents as a means to conserve nature and support livelihoods, principally of those employed or operating in the agriculture sector.<sup>83</sup> In this way, it is often presented by stakeholders as a means of achieving objectives relevant to both biodiversity conservation and the viability of the sector.<sup>84</sup> Other alleged benefits of recreational hunting include the control of overabundant species<sup>85</sup> and the restoration of ecosystems and species' populations.<sup>86</sup> Many of these are reflected in the key objectives of the Act and Regulation.<sup>87</sup> Indeed, these are two of the primary objectives identified by the NSW Government in justifying the amendments to the Regulation.<sup>88</sup>

The assumption that simply because recreational hunting kills animals it must be effective is flawed.<sup>89</sup> Because there are not enough resources for them to survive, most young wild animals in NSW die in their first year of life. For many species included in Schedule 3 of the Act, more than 50% of their population must be killed every year just to maintain the status

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<sup>79</sup> Booth, C. 2009. Is recreational hunting effective for feral animal control? Available via [www.invasives.org.au/wp-content/uploads/2009/01/report-is-recreational-hunting-effective-for-feral-animal-control.pdf](http://www.invasives.org.au/wp-content/uploads/2009/01/report-is-recreational-hunting-effective-for-feral-animal-control.pdf); Mitchell, J. 2011. *Shooting/Hunting of Feral Pigs*. Townsville: North Queensland Dry Tropics; Ankeny, R. and Bray, H. 2018. Ferals or food? Does hunting have a role in ethical food consumption in Australia? In N. Carr and J. Young (Eds.), *Wild Animals and Leisure: Rights and Wellbeing*. New York: Routledge.

<sup>80</sup> Senate Environment and Communications Reference Committee. 2021. *Impact of Feral Deer, Pigs and Goats in Australia: Final Report*. Canberra: Commonwealth of Australia.

<sup>81</sup> RSPCA Australia. 2020. Is recreational hunting an effective form of pest animal management? Available via <https://kb.rspca.org.au/knowledge-base/is-recreational-hunting-an-effective-form-of-pest-animal-management>.

<sup>82</sup> *ibid.*

<sup>83</sup> Di Minin, E., Clements, H., Correia, R., Cortés-Capano, G., Fink, C., Haukka, A., Hausmann, A., Kulkarni, R. and Bradshaw, C. 2021. Consequences of recreational hunting for biodiversity conservation and livelihoods. *One Earth*, 4(2): 238-253.

<sup>84</sup> Di Minin, E., Leader-Williams, N. and Bradshaw, C. 2016. Banning trophy hunting will exacerbate biodiversity loss. *Trends in Ecology and Evolution*, 31: 99-102.

<sup>85</sup> Quirós-Fernández, F., Marcos, J., Acevedo, P. and Gortázar, C. 2017. Hunters serving the ecosystem: the contribution of recreational hunting to wild boar population control. *European Journal of Wildlife Research*, 63: 4-9.

<sup>86</sup> Di Minin, E., Clements, H., Correia, R., Cortés-Capano, G., Fink, C., Haukka, A., Hausmann, A., Kulkarni, R. and Bradshaw, C. 2021. Consequences of recreational hunting for biodiversity conservation and livelihoods. *One Earth*, 4(2): 238-253.

<sup>87</sup> Department of Primary Industries (DPI). 2017. *Economic Impact of Recreational Hunting in NSW: Final Report*. Available via [www.dpi.nsw.gov.au/\\_data/assets/pdf\\_file/0007/723454/economic-impact-of-recreational-hunting-in-nsw.pdf](http://www.dpi.nsw.gov.au/_data/assets/pdf_file/0007/723454/economic-impact-of-recreational-hunting-in-nsw.pdf); Department of Primary Industries (DPI). 2017. *NSW Game Hunting Guide*. Available via

[www.dpi.nsw.gov.au/\\_data/assets/pdf\\_file/0010/711658/nsw-game-hunting-guide.pdf](http://www.dpi.nsw.gov.au/_data/assets/pdf_file/0010/711658/nsw-game-hunting-guide.pdf).

<sup>88</sup> Department of Primary Industries (DPI). 2022a. *Regulatory Impact Statement: Proposed Game and Feral Animal Control Regulation 2022*. Available via [www.haveyoursay.nsw.gov.au/78456/widgets/375803/documents/234953](http://www.haveyoursay.nsw.gov.au/78456/widgets/375803/documents/234953).

<sup>89</sup> Booth, C. 2009. Is recreational hunting effective for feral animal control? Available via [www.invasives.org.au/wp-content/uploads/2009/01/report-is-recreational-hunting-effective-for-feral-animal-control.pdf](http://www.invasives.org.au/wp-content/uploads/2009/01/report-is-recreational-hunting-effective-for-feral-animal-control.pdf)

quo.<sup>90</sup> For some species, this figure rises to more than 65%.<sup>91</sup> Only about 15% of pigs in parts of NSW survive a single year.<sup>92</sup> In other species, these statistics are significantly lower. Between 1-10% of all rabbits and only 20% of all foxes survive their first year.<sup>93</sup> These animals are referred to as the “doomed surplus” because the remainder die due to starvation, predation or disease.<sup>94</sup> As such, recreational hunting has a very small impact on their populations. This means that large numbers of animals are killed with no benefits to the environment or agricultural productivity.

It has also been shown that killing wild pigs, especially by using dogs, is counterproductive because it disperses pigs and can make them increasingly wary of humans.<sup>95</sup> This has been noted in other species, such as deer<sup>96</sup>, whose home ranges increase due to hunting activities.<sup>97</sup> Hunters may also selectively target some individuals, often large males, and avoid others due to a desire to maintain populations for future hunting expeditions.<sup>98</sup> This also relates to trophy hunting. Recreational hunters often prefer to shoot male deer for the antlers or male pigs for tusk size, despite the fact that the removal of males from a population has no impact on birth rates.<sup>99</sup> The latter is supported by an industry that retails “brag sticks” that are used to demonstrate the size of pigs during subsequent photo shoots.<sup>100</sup> As Figures 1 and 2 below show, hunters often use tree branches in the absence of a brag stick. Finally, the stress and fear caused by hunting activities in the habitat of non-target species can cause long-term impacts on species survival.<sup>101</sup>

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<sup>90</sup> Booth, C. 2009. Is recreational hunting effective for feral animal control? Available via [www.invasives.org.au/wp-content/uploads/2009/01/report-is-recreational-hunting-effective-for-feral-animal-control.pdf](http://www.invasives.org.au/wp-content/uploads/2009/01/report-is-recreational-hunting-effective-for-feral-animal-control.pdf)

<sup>91</sup> Fairbridge, D. and C. Marks. 2005. *Evaluation of the 2002/03 Victorian Fox Bounty Trial*. Frankston: Victorian Government Department of Primary Industries.

<sup>92</sup> Saunders, G. 1993. The demography of feral pigs (*Sus scrofa*) in Kosciusko National Park, New South Wales. *Wildlife Research*, 20: 559-569.

<sup>93</sup> Invasive Species Council. 2012. Recreational hunting NSW: claims v. facts. Available via [https://invasives.org.au/wp-content/uploads/2014/02/fs\\_rechunt\\_NSWfacts.pdf](https://invasives.org.au/wp-content/uploads/2014/02/fs_rechunt_NSWfacts.pdf).

<sup>94</sup> Banks, P. 2001. Predation by introduced foxes on native bush rats in Australia: do foxes take the doomed surplus? *Journal of Applied Ecology*, 36(6): 1063-1071.

<sup>95</sup> RSPCA Australia. 2017. Recreational hunting and animal welfare. Available via <https://kb.rspca.org.au/wp-content/uploads/2018/11/Recreational-hunting-RSPCA-Information-Paper-Dec-2017.pdf>.

<sup>96</sup> Grignolio, S., Merli, E., Bongi, P., Ciuti, S. and Apollonio, M. 2011. Effects of hunting with hounds on a non-target species living on the edge of a protected area. *Biological Conservation*, 144(1): 641-649.

<sup>97</sup> Mohlman, J., Gardner, R., Parnell, I., Wilhite, N. and Martin, K. 2019. Nonconsumptive effects of hunting on a nontarget game bird. *Ecology and Evolution*, 9(16): 9324-9333.

<sup>98</sup> RSPCA Australia. 2017. Recreational hunting and animal welfare. Available via <https://kb.rspca.org.au/wp-content/uploads/2018/11/Recreational-hunting-RSPCA-Information-Paper-Dec-2017.pdf>.

<sup>99</sup> Booth, C. 2009. Is recreational hunting effective for feral animal control? Available via [www.invasives.org.au/wp-content/uploads/2009/01/report-is-recreational-hunting-effective-for-feral-animal-control.pdf](http://www.invasives.org.au/wp-content/uploads/2009/01/report-is-recreational-hunting-effective-for-feral-animal-control.pdf)

<sup>100</sup> Brisbane Hunting Supplies. 2022. BHS acrylic brag stick keyring. Available via [www.brisbanehuntingsupplies.com.au/product/bhs-acrylic-brag-stick-keyring](http://www.brisbanehuntingsupplies.com.au/product/bhs-acrylic-brag-stick-keyring).

<sup>101</sup> Dudeck, B., Clinchy, M., Allen, M. and Zanette, L. 2018. Fear affects parental care, which predicts juvenile survival and exacerbates the total cost of fear on demography. *Ecology*, 99: 127-135.

Fig. 1 and 2: Wild boars displayed using a brag stick (left) and a tree branch (right)



We have shown that available evidence suggests that these objectives are not and cannot be achieved by recreational hunting. For example, if a hunter kills a wild animal whose likelihood of survival is low, this allows others of the same species to survive by reducing their competition for limited resources.<sup>102</sup> This is further compounded by the deliberate acts of some hunters. In some cases, evidence has demonstrated that pig hunters have illegally translocated pigs<sup>103</sup> and deer<sup>104</sup> into new areas for the purposes of recreational hunting. Despite this practice being identified in the threat abatement plan ('TAP') for predation, habitat degradation, competition and disease transmission by pigs<sup>105</sup>, the Department has proposed to replace the existing penalty regime associated with the deliberate release of an animal with a monetary fine.

Under section 17 of the *Crimes (Sentencing Procedure) Act* one penalty unit is equal to \$110. Section 55 of the *Game and Feral Animal Control Act* states that it is an offence to release animals for the purpose of hunting. Doing so attracts a maximum penalty of 50 units (i.e., \$5,500 under the current penalty unit rate).<sup>106</sup> Under the current Regulation, however, it is not possible to issue a penalty notice for the offence of releasing an animal into the wild in order to hunt them or their descendants. This is noted in the summary of changes and context document provided by the Department.<sup>107</sup> According to this document, such an offence had to be prosecuted in court. The amendment proposed by the Department would remove this from the enforcement framework and replace it with a \$400 penalty infringement

<sup>102</sup> Invasive Species Council. 2012. Recreational hunting NSW: claims v. facts. Available via [https://invasives.org.au/wp-content/uploads/2014/02/fs\\_rechunt\\_NSWvfacts.pdf](https://invasives.org.au/wp-content/uploads/2014/02/fs_rechunt_NSWvfacts.pdf).

<sup>103</sup> Cowled, B. and O'Connor, C. 2004. *A Project that Investigates Current Options for Managing Feral Pigs in Australia and Assess the Need for the Development of more Effective and Humane Techniques and Strategies*. Canberra: Pest Animal Control Cooperative Research Centre; Spencer, P. and Hampton, J. 2005. Illegal translocation and genetic structure of feral pigs in western Australia. *Journal of Wildlife Management*, 69(1): 377-384.

<sup>104</sup> RSPCA Australia. 2017. Recreational hunting and animal welfare. Available via <https://kb.rspca.org.au/wp-content/uploads/2018/11/Recreational-hunting-RSPCA-Information-Paper-Dec-2017.pdf>.

<sup>105</sup> Australian Government Department of the Environment and Energy. 2017. *Threat Abatement Plan for Predation, Habitat Degradation, Competition and Disease Transmission by Feral Pigs (Sus scrofa): Background Document*. Canberra: Commonwealth of Australia.

<sup>106</sup> Department of Primary Industries (DPI). 2022a. *Regulatory Impact Statement: Proposed Game and Feral Animal Control Regulation 2022*. Available via [www.haveyoursay.nsw.gov.au/78456/widgets/375803/documents/234953](http://www.haveyoursay.nsw.gov.au/78456/widgets/375803/documents/234953).

<sup>107</sup> Department of Primary Industries (DPI). 2022c. Summary of changes and context: proposed Game and Feral Animal Control Regulation 2022. Available via <https://bit.ly/3c6UKDf>.

notice ('PIN').<sup>108</sup> In so doing, the proposed amendment would remove this additional compliance mechanism and thereby reduce oversight of the activities of hunters in NSW.

Ethics play a central role in the justification of most conservation activities.<sup>109</sup> According to the NSW Government, the hunting of wild animals “should only be used in a strategic manner” and as part of “a coordinated program” designed to achieve a “rapid and sustained reduction” in their populations and impacts.<sup>110</sup> These are the broad objectives of the Act and the Regulations.<sup>111</sup> Animal Liberation contends that because recreational hunting does not achieve this stated objective, it breaches these standards “by promoting killing that provides no benefit other than recreational pleasure for hunters”.<sup>112</sup> When these concerns are combined with the human pressures increasingly placed on biodiversity, it becomes apparent that hunting can be counterproductive to the stated objectives of the Act and its Regulations.

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<sup>108</sup> *ibid.*

<sup>109</sup> Minter, B. and Miller, T. 2011. The new conservation debate: ethical foundations, strategic trade-offs and policy opportunities. *Biological Conservation*, 144(3): 945-947; Saltz, D., Justus, J. and Huffaker, B. 2018. The crucial but underrepresented role of philosophy in conservation science curricula. *Conservation Biology*, 33(1): 217-220.

<sup>110</sup> Department of Primary Industries (DPI). 2022b. NSWDEER SOP1: Ground shooting of feral deer. Available via [www.dpi.nsw.gov.au/\\_data/assets/pdf\\_file/0006/1396761/NSWDEER-SOP1-Ground-shooting-of-feral-deer.PDF](http://www.dpi.nsw.gov.au/_data/assets/pdf_file/0006/1396761/NSWDEER-SOP1-Ground-shooting-of-feral-deer.PDF).

<sup>111</sup> Department of Primary Industries (DPI). 2022a. *Regulatory Impact Statement: Proposed Game and Feral Animal Control Regulation 2022*. Available via <https://bit.ly/3NQkqaC>.

<sup>112</sup> Invasive Species Council (ISC). 2012. *Recreational Hunting NSW: Claims v Facts*. Available via [www.invasives.org.au/wp-content/uploads/2014/02/fs\\_rechunt\\_NSWfacts.pdf](http://www.invasives.org.au/wp-content/uploads/2014/02/fs_rechunt_NSWfacts.pdf).



## 2. Points of objection

The RIS produced by the NSW Government that accompanies the proposed changes to the Regulations explains that the objectives of the Act are to “provide for the effective management of introduced species of game and feral animals”.<sup>113</sup> Given that we have shown hunting does not effectively achieve this objective, it is apparent that reducing restrictions to enable additional hunters to participate in a practice that has a negligible impact on their populations and their actual impacts on ecosystems and agriculture is clearly counterproductive.

Ultimately, we believe that the stated objectives and the spirit of the Act and its Regulations are inconsistent with all available evidence. This is particularly notable relating to the limited significance of hunting in protecting environmental values or agricultural productivity. The objectives would be far better served by investigating alternative methods that reduce the known threats and risks associated with recreational hunting. As such, we implore the NSW Government to invest in research and development focusing on identifying such alternatives.

Animal Liberation strongly opposes the following proposed changes to the Regulations.

- **Proposed amendments to allow the issuing of a game hunting licence to children under 12 years**

Section 13(3) of the Regulation prohibits people under 12 years from applying for and obtaining a game hunting licence. The Department has proposed removing this clause and thereby seeks to permit persons under 12 years to do so. Animal Liberation strongly opposes this proposed amendment. As the previous sections of this response have shown, hunting involves significant animal cruelty and inherent violence. Children of this age should not be exposed to hunting because they likely do not have the proficiency and skill to ensure animal suffering will be minimised. Finally, a growing body of evidence demonstrates that exposure to animal cruelty may produce adverse psychological outcomes in children that can ultimately generate higher instances of violent behaviour in adulthood.<sup>114</sup>

- **Proposed amendment to allow people as young as 16 years to hunt with bows and dogs without adult supervision**

Section 3 of Part 1 of the existing Regulations specifies that individuals under 18 years must be closely and personally supervised while hunting on public land by a person who holds the same type of licence and written permission. Animal Liberation

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<sup>113</sup> Department of Primary Industries (DPI). 2022a. *Regulatory Impact Statement: Proposed Game and Feral Animal Control Regulation 2022*. Available via <https://bit.ly/3NQkqaC>.

<sup>114</sup> Bright, M., Huq, M., Spencer, T., Applebaum, J. and Hardt, N. 2018. Animal cruelty as an indicator of family trauma: using adverse childhood experiences to look beyond child abuse and domestic violence. *Child Abuse and Neglect*, 76: 287-296; Jegatheesan, B., Enders-Slegers, M., Ormerod, E. and Boyden, P. 2020. Understanding the link between animal cruelty and family violence: the bioecological systems model. *International Journal of Environmental Research and Public Health*, 17(9): 3116; Ladny, R. and Meyer, L. 2020. Traumatized witnesses: review of childhood exposure to animal cruelty. *Journal of Adolescent Trauma*, 13(4): 527-537; Wauthier, L., the Scottish Society for the Prevention of Cruelty to Animals and Williams, J. 2020. A qualitative study of children's accounts of cruelty to animals: uncovering the roles of trauma, exposure to violence and attachment. *Journal of Interpersonal Violence*, 37(9-10): NP6405-NP6438.

strongly opposes proposed amendments to the Regulations that would permit teenagers (i.e., those aged under 18 years) to use bows and/or dogs to hunt in the absence of adult supervision. Due to the significant public safety and animal welfare concerns outlined in previous sections of this response, we oppose the proposed amendment that would lower the age of supervision to 16 years for those using bows or dogs while hunting.

- **Proposed amendment to increase the maximum period of licensing**

Animal Liberation strongly objects to the proposed amendment that would increase the maximum licence duration from 5 to 10 years. Doing so necessarily enables less scrutiny of hunters. We recommend that the Regulations retain the maximum 5-year period. Increasing this period to 10 years will diminish oversight. Similarly, we recommend that the Regulations require applicants to declare convictions received in the preceding 10 years.

- **Proposed removal of the Hunter’s Code of Practice (‘HCOP’) from the Regulations**

Model Codes of Practice (‘MCOPs’ or ‘COPs’) are practical guides to achieving standards of health and safety.<sup>115</sup> COPs apply to any person who has a duty of care under the circumstances they describe.<sup>116</sup> As it applies to the Act and the Regulations under review, the COP refers to the Hunter’s Code of Practice (‘HCOP’). Section 24 of the Act maintains that the COP is intended “to identify the provisions that must be observed by persons hunting game animals” and to ensure compliance with its mandatory provisions. These are outlined in Schedule 2 of the existing Regulations. Ultimately, the purpose of the HCOP is to “ensure ethical, safe and responsible hunting takes place” under the Act and its Regulations.<sup>117</sup> The RIS notes, for example, that the mandatory provisions of the HCOP “reduce the risk of negative impacts for human safety and animal welfare”.<sup>118</sup>

Animal Liberation understands that the Department is currently reviewing the HCOP and, in alignment with the requirements of the Act under section 24(3), intends to provide a draft for public comment. This is to be followed by a review report by the Minister for Agriculture. There is no publicly accessible information advising when the draft COP, prepared to replace the existing COP, is expected to become available. Under section 24(3) of the Act, the Minister must take into account any submissions made before approving a COP.

Animal Liberation strongly opposes the proposed removal of the mandatory Hunter’s Code of Practice (‘HCOP’) from the Regulations. Retaining the HCOP in Schedule 2 is critical as it expressly prescribes non-negotiable animal welfare requirements that

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<sup>115</sup> Safe Work Australia. n.d. Codes of Practice. Available via [www.safeworkaustralia.gov.au/law-and-regulation/codes-practice](http://www.safeworkaustralia.gov.au/law-and-regulation/codes-practice).

<sup>116</sup> Department of Regional NSW (DRNSW). 2022. Codes of practice. Available via [www.resourcesregulator.nsw.gov.au/safety/safety-resources/codes-of-practice](http://www.resourcesregulator.nsw.gov.au/safety/safety-resources/codes-of-practice).

<sup>117</sup> Department of Primary Industries (DPI). n.d. Hunter’s Code of Practice. Available via [www.dpi.nsw.gov.au/hunting/rules-and-regulations/hunters-code-of-practice](http://www.dpi.nsw.gov.au/hunting/rules-and-regulations/hunters-code-of-practice).

<sup>118</sup> Department of Primary Industries (DPI). 2022a. *Regulatory Impact Statement: Proposed Game and Feral Animal Control Regulation 2022*. Available via <https://bit.ly/3NQkgaC>.

are applicable to all hunters. Under the existing Regulations, the provisions of the Code are mandatory, and all hunters are obliged to adhere to them. One of the most important requirements is an obligation to avoid animal suffering.

- **Proposed amendment to reduce the penalty for owners whose dogs do not wear a collar with their details by over 60%**

Given that it is a legal requirement under section 2 of the *Companion Animals Act 1998* for all other owners of companion animals to ensure that dogs have a collar that clearly shows their address and telephone number, the justification for removing this for dogs used in hunting is unclear. Moreover, this amendment represents a serious threat to the welfare of dogs used by NSW hunters.

- **Proposed amendment to reduce the penalty for hunters who don't wear bright safety colours when hunting on public land by over 80%**

The purpose and value of wearing bright colours when engaging in risky behaviour, such as hunting, are clear. Doing so clearly improves safety.<sup>119</sup> One of the Department's clear public safety messages has been "be safe, be seen... in blaze orange", for this very reason.<sup>120</sup> Similarly, the *New South Wales Hunter Education Handbook*, published by the Game Licensing Unit of the Department, states that "safety is improved if you wear an item of blaze orange clothing".<sup>121</sup>

As human safety is one of the key risks the NSW Government has identified in preparing the Regulations, it is unclear why reducing the penalty by over 80% for failing to do so on public land can be justified.<sup>122</sup> This is not adequately discussed or addressed in the RIS. Similarly, reducing the penalty for hunters engaging in target practice is inconsistent with the known threats this behaviour produces. Illegal hunting is a widespread issue in many parts of NSW. Reducing the penalty for engaging in target practice minimises obstacles to those who may already do so, placing other residents at further unnecessary risk.

- **Proposed amendment to the requirements for declaration of hunting on public land**

Animal Liberation opposes the proposed amendment regarding how a declaration of public land for hunting may be published under the Regulation. In order to ensure transparency and accountability, such declarations must be published in both the NSW Government Gazette and local newspapers that are distributed in the relevant area. We recommend that the provisions contained in section 20 of the existing

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<sup>119</sup> Game Management Authority. 2021. Ethical hunting. Available via [www.gma.vic.gov.au/hunting/deer/ethical-hunting](http://www.gma.vic.gov.au/hunting/deer/ethical-hunting).

<sup>120</sup> Department of Primary Industries (DPI). 2019. Facebook post. Available via <https://m.facebook.com/NSWDPIHunting/posts/2381793725421031>.

<sup>121</sup> Department of Primary Industries (DPI). 2015. *The NSW Hunter Education Handbook*. Third edition. Orange: Department of Primary Industries Game Licensing Unit.

<sup>122</sup> Department of Primary Industries (DPI). 2022a. *Regulatory Impact Statement: Proposed Game and Feral Animal Control Regulation 2022*. Available via <https://bit.ly/3NQkgaC>.

Regulations are retained.

### 3. Recommendations

Given the evidence outlined in previous sections of this response, Animal Liberation provides the following series of recommendations:

- **Introducing a prohibition on the use of hunting with dogs (“pig-dogging”)**

In 2019, estimates suggested that there were over 150,000 dogs kept specifically to hunt pigs across the country.<sup>123</sup> Under section 33 of the *Companion Animals Act 1998*, these dogs are a declared dangerous dog. Yet NSW has “some of the most generous animal welfare exemptions for pig hunting” in Australia.<sup>124</sup> Under the existing Regulations, these exemptions allow dogs to bite, hold or “lug” onto pigs during hunts. Though no assessment has been performed on the humaneness of using dogs to hunt pigs, available evidence demonstrates that this exemption places these dogs at significant risk.<sup>125</sup>

Surveys show that many of these dogs “receive minimal veterinary and preventative health care”.<sup>126</sup> Using a knife to kill an unrestrained wild pig can be dangerous to both the hunter and the dog.<sup>127</sup> Typically, two to three dogs bite and hold onto a pig, with two on each ear and occasionally a third who bites a leg or other limb.<sup>128</sup> Biting the ear of a boar with large, sharp tusks is inherently risky, and dogs who hesitate or lose their grip may be stabbed in the process.<sup>129</sup> When a pig is “restrained” by the dogs, a hunter generally approaches from behind to lift a rear leg to stab the pig. After the pig has been stabbed multiple times, the hunter often releases the leg and retreats.<sup>130</sup> Though some hunters may call the dogs away from the pig at this point, video footage shows many do not.<sup>131</sup>

In addition to these direct welfare threats that dogs are exposed to during the hunting process, the RSPCA notes that risks to dogs used for pig hunting include heat exhaustion, poisoning, tick paralysis, vehicular trauma, snake bites and accidental shooting.<sup>132</sup> Many go missing during pig hunting expeditions.<sup>133</sup> When they become

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<sup>123</sup> Orr, B., Malik, R., Norris, J. and Westman, M. 2019. The welfare of pig-hunting dogs in Australia. *Animals*, 9: 853.

<sup>124</sup> *ibid.*

<sup>125</sup> *ibid.*

<sup>126</sup> Orr, B., Ma, G., Koh, W., Malik, R., Norris, J., Westman, M., Wigney, D., Brown, G., Ward, M. and Šlapeta, J. 2020. Pig-hunting dogs are an at-risk population for canine heartworm (*Dirofilaria immitis*) infection in eastern Australia. *Parasites and Vectors*, 13(1).

<sup>127</sup> Orr, B., Malik, R., Norris, J. and Westman, M. 2019. The welfare of pig-hunting dogs in Australia. *Animals*, 9: 853.

<sup>128</sup> Cowled, B. and O'Connor, C. 2004. *A Project that Investigates Current Options for Managing Feral Pigs in Australia and Assess the Need for the Development of more Effective and Humane Techniques and Strategies*. Canberra: Pest Animal Control Cooperative Research Centre.

<sup>129</sup> Orr, B., Malik, R., Norris, J. and Westman, M. 2019. The welfare of pig-hunting dogs in Australia. *Animals*, 9: 853.

<sup>130</sup> Caley, P. and Ottley, B. 1995. The effectiveness of hunting dogs for removing feral pigs (*Sus scrofa*). *Wildlife Research*, 22; 147-154; Cowled, B. and O'Connor, C. 2004. *A Project that Investigates Current Options for Managing Feral Pigs in Australia and Assess the Need for the Development of more Effective and Humane Techniques and Strategies*. Canberra: Pest Animal Control Cooperative Research Centre; RSPCA Australia. 2020. What happens when dogs are used to hunt feral pigs? Available via <https://kb.rspca.org.au/knowledge-base/what-happens-when-dogs-are-used-to-hunt-feral-pigs/#ftn1>.

<sup>131</sup> Orr, B., Malik, R., Norris, J. and Westman, M. 2019. The welfare of pig-hunting dogs in Australia. *Animals*, 9: 853.

<sup>132</sup> RSPCA Australia. 2019. How are dogs used for hunting? Available via <https://kb.rspca.org.au/knowledge-base/how-are-dogs-used-for-hunting>; RSPCA Australia. 2020. What happens when dogs are used to hunt feral pigs? Available via <https://kb.rspca.org.au/knowledge-base/what-happens-when-dogs-are-used-to-hunt-feral-pigs/#ftn1>.

<sup>133</sup> Environment, Natural Resources and Regional Development Committee. 2016. Inquiry into the control of invasive animals on Crown land. Available via

lost, they become susceptible to dehydration, starvation or, if they survive long enough, joining the wild population.<sup>134</sup> If they join a free-living population, they become subject to lethal control themselves under Schedule 3 of the Act.

Though such risks are particularly pronounced in relation to animal welfare, the practice of pig dogging poses substantial risks to human health, too. These risks include physical injury and infection with zoonotic diseases. Recent reviews have identified pig hunters to be at increased risk of being diagnosed with leptospirosis<sup>135</sup>, a zoonotic disease derived from infected urine that is of increasing significance to public health.<sup>136</sup> In dogs, the disease has a mortality rate as high as 88%.<sup>137</sup> Other diseases are also prevalent in dogs used for pig hunting. Q fever (*Coxiella burnetii*), for example, is “one of the most important notifiable zoonotic diseases in Australia”; recent samples have found pig-hunting dogs to be infected at the highest recorded level in Australia.<sup>138</sup> Despite this, less than 13% of sampled dogs had been vaccinated against the disease.<sup>139</sup> Similarly, because pig-hunting dogs are typically large breed, short-coated and live outdoors<sup>140</sup>, their risk of being bitten by mosquitoes and developing canine heartworm disease increases.<sup>141</sup> Similar concerns exist in relation to the potential spread of African swine fever (‘ASF’). Though ASF has not yet occurred in Australia, the Commonwealth regards its distribution in nearby countries as a serious biosecurity threat.<sup>142</sup> The Department notes that it is “a serious, highly contagious disease” that can affect domestic and wild pigs of all ages.<sup>143</sup> For these reasons, state governments have warned pig hunters to “remain vigilant”.<sup>144</sup> Given its ability to spread by direct contact with infected pigs and other vectors, such as ticks<sup>145</sup>, the practice of pig-dogging represents a significant threat.

Hunting with dogs should be prohibited on public land to reduce harassment, injury to non-target native species, animal welfare impacts on target species, and the chance that hunting dogs are lost which heightens the threat to public safety, livestock and

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[www.parliament.vic.gov.au/images/stories/committees/enrc/Invasive\\_Animals\\_on\\_Crown\\_land/transcripts/Bushwalking\\_Victoria.pdf](http://www.parliament.vic.gov.au/images/stories/committees/enrc/Invasive_Animals_on_Crown_land/transcripts/Bushwalking_Victoria.pdf)

<sup>134</sup> Worrad, S. 2011. RSPCA demands end to pig hunting. *The Veterinarian*, 9 June; Orr, B., Malik, R., Norris, J. and Westman, M. 2019. The welfare of pig-hunting dogs in Australia. *Animals*, 9: 853; RSPCA Australia. 2019. How are dogs used for hunting? Available via <https://kb.rspca.org.au/knowledge-base/how-are-dogs-used-for-hunting>.

<sup>135</sup> Orr, B., Westman, M., Malik, R., Purdie, A., Craig, S. and Norris, J. 2022. Leptospirosis is an emerging infectious disease of pig-hunting dogs and humans in north Queensland. *PLoS ONE: Neglected Tropical Diseases*, 16(1): e0010100.

<sup>136</sup> Guernier, V., Goarant, C., Benschop, J. and Lau, C. 2018. A systematic review of human and animal leptospirosis in the Pacific Islands reveals pathogen and reservoir diversity. *PLoS ONE: Neglected Tropical Diseases*, 12(5): e0006503; Soo, Z., Khan, N. and Siddiqui, R. 2020. Leptospirosis: increasing importance in developing countries. *Acta Tropica*, 201:105183.

<sup>137</sup> Griebsch, C., Kirkwood, N., Ward, M., So, W., Weerakon, L., Donahoe, S. and Norris, J. 2022. Emerging leptospirosis in urban Sydney dogs: a case series (2017-2020). *Australian Veterinary Journal*, 100(5): 190-200.

<sup>138</sup> Orr, B., Malik, R., Westman, M. and Norris, J. 2022. Seroprevalence of *Coxiella burnetii* in pig-hunting dogs from north Queensland, Australia. *Australian Veterinary Journal*, 100(6).

<sup>139</sup> *ibid.*

<sup>140</sup> Orr, B., Malik, R., Norris, J. and Westman, M. 2019. The welfare of pig-hunting dogs in Australia. *Animals*, 9: 853.

<sup>141</sup> Orr, B., Ma, G., Koh, W., Malik, R. and Šlapeta, J. 2020. Pig-hunting dogs are an at-risk population for canine heartworm (*Dirofilaria immitis*) infection in eastern Australia. *Parasites and Vectors*, 13(1).

<sup>142</sup> Department of Agriculture, Fisheries and Forestry (DAFF). 2021. Keeping African swine fever out of Australia. Available via [www.agriculture.gov.au/biosecurity-trade/pests-diseases-weeds/animal/asf#:~:text=ASF%20has%20never%20occurred%20in,our%20trade%20and%20the%20economy](http://www.agriculture.gov.au/biosecurity-trade/pests-diseases-weeds/animal/asf#:~:text=ASF%20has%20never%20occurred%20in,our%20trade%20and%20the%20economy).

<sup>143</sup> Department of Primary Industries (DPI). n.d. African swine fever. Available via [www.dpi.nsw.gov.au/biosecurity/animal/info-vets/african-swine-fever](http://www.dpi.nsw.gov.au/biosecurity/animal/info-vets/african-swine-fever).

<sup>144</sup> Agriculture Victoria. n.d. Feral pig hunting? Make biosecurity your target. Available via [https://agriculture.vic.gov.au/\\_data/assets/pdf\\_file/0004/536197/Factsheet-Feral-pig-hunting-and-African-swine-fever.pdf](https://agriculture.vic.gov.au/_data/assets/pdf_file/0004/536197/Factsheet-Feral-pig-hunting-and-African-swine-fever.pdf); Northern Territory Government. n.d. African swine fever. Available via [https://nt.gov.au/\\_data/assets/pdf\\_file/0004/747661/community-asf-good-hunting-practices.pdf](https://nt.gov.au/_data/assets/pdf_file/0004/747661/community-asf-good-hunting-practices.pdf).

<sup>145</sup> Department of Primary Industries (DPI). n.d. African swine fever. Available via [www.dpi.nsw.gov.au/biosecurity/animal/info-vets/african-swine-fever](http://www.dpi.nsw.gov.au/biosecurity/animal/info-vets/african-swine-fever).

wildlife.

- **The new Regulations should not be approved until after the public has been given the opportunity to consider, review and provide comments in response to the new Hunter's Code of Practice**
- **After the new Hunter's Code of Practice has been subject to a four-week public consultation period, the new Regulations should retain or increase existing penalties for offences**

## **4. Conclusion**

Animal Liberation appreciates the opportunity to provide this response to the proposed amendments and hope that our recommendations are thoroughly and transparently considered.

We expect a copy of this document to be provided to the Legislation Review Committee of the NSW Parliament with the final version of the Regulation.





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