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17 March 2026

Dear Premier, Ministers and Members of Parliament,

**Submission Regarding Victoria's 2026 Recreational Native Bird Hunting Season**

1. Lawyers for Animals (LFA) is deeply concerned that the Victorian Government continues to permit recreational native bird shooting, contrary to community sentiment and evidence regarding the harms caused by this cruel practice.
2. LFA proposes that the Victorian Government:
  - a. Revokes the upcoming native bird hunting season set to occur between 18 March 2026 to 8 June 2026; and
  - b. Joins other Australian states in banning recreational native bird shooting in Victoria.

**Background**

3. This submission follows LFA's previous submissions on this issue, including:

- a. ['Submission to Inquiry into Victoria's Recreational Native Bird Hunting Arrangements', sent to the Select Committee on Victoria's Recreational Native Bird Hunting Arrangements on 8 May 2023](#); and
- b. ['Submission regarding the 2020 hunting season for indigenous game birds \(waterfowl\)', sent to Minister for Agriculture Jaclyn Symes and Minister for Energy, Environment and Climate Change Lily D'Ambrosio, on 19 December 2020](#).

## Who we are

4. Formed in 2005, LFA is a not-for-profit incorporated association based in Victoria, run by an executive committee of lawyers and with members in various Australian States and Territories. LFA is staffed entirely by volunteers.
5. LFA's objectives include:
  - a. alleviating the suffering of animals by engaging with those who create or administer laws in Australia to strengthen legal protections for animals;
  - b. promoting better animal welfare practices amongst animal-related industries in Australia; and
  - c. undertaking educational activities in an effort to dispel myths and increase awareness relating to animals and the law.
6. Since April 2013, LFA has also worked in partnership with the Fitzroy Legal Service to operate an animal law clinic: a free legal advice service run with the primary objective of improving animal welfare.

## Rationale

7. LFA seeks the immediate revocation of the 2026 recreational native bird hunting season, and the banning of recreational duck and quail shooting across Victoria. The key factors underlying LFA's position are as follows.

### *Animal cruelty*

8. A significant number of the birds shot during each hunting season are wounded in shooting but not retrieved by hunters. They are subsequently left to suffer for days or weeks before succumbing to their injuries. The Final Report of the Select Committee on Victoria's Recreational Native Bird Hunting Arrangements (Select Committee Report) provided an estimate that each year up to 40% of birds shot are wounded and left to suffer rather than killed immediately by a lethal shot.<sup>1</sup>
9. Field & Game Australia have acknowledged that there are various reasons why retrieval can be impeded, even where a hunter elects to retrieve a wounded bird, such as evasive behaviour by birds and terrain challenges.

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<sup>1</sup> Select Committee on Victoria's Recreational Native Bird Hunting Arrangements, *Victoria's Recreational Native Bird Hunting Arrangements - Inquiry* (August 2023) [https://www.parliament.vic.gov.au/4a9151/contentassets/1dbd275555b9401a93f298ec115c421f/lc-native-birds-60-01\\_vic\\_rec\\_nativebirdhunting.pdf](https://www.parliament.vic.gov.au/4a9151/contentassets/1dbd275555b9401a93f298ec115c421f/lc-native-birds-60-01_vic_rec_nativebirdhunting.pdf) ('**Select Committee Report**'), p 13.

10. Even if measures are adopted to attempt to reduce the rate of wounding, such as the Victorian Government's Waterfowl Wounding Reduction Action Plan, a significant number of birds are likely to be left injured.<sup>2</sup> Hunting stakeholders have conceded that it is not feasible to avoid wounding due to the nature of bird hunting.<sup>3</sup>
11. When wounded birds are not abandoned by shooters, particularly cruel killing methods are often used to 'dispatch' these birds. Despite the practice being contrary to the Game Management Authority's (GMA) guidelines, evidence indicates that many hunters use 'windmilling', a method whereby a bird is swung by its head in order to break its neck.<sup>4</sup> After attempted 'windmilling', birds have been observed "*still flapping and moving around...they hang them on their belts...or they throw them in their punts while they are still jerking and moving around*".<sup>5</sup> Other methods used, which are accepted by the GMA as 'humane dispatch', include cervical dislocation and blunt force impact including striking a bird's head against a hard surface (both of which can be performed while a bird is conscious).<sup>6</sup>
12. A survey conducted by the GMA indicated that only 13% of hunters had accurate knowledge of accepted methods for 'dispatching' wounded ducks, and only 37% knew how to minimise wounding.<sup>7</sup>
13. The above examples of cruelty would typically be considered an offence under the *Prevention of Cruelty to Animals Act 1986* (Vic) (Act). However, native bird hunting is specifically exempt from the cruelty provisions of the Act. A substantial number of native birds are therefore subject to levels of cruelty that the community expects to constitute a criminal offence, simply because they are performed in the context of a recreational activity enjoyed by a miniscule portion of the population.
14. Implementing training and education with the view to improving hunters' knowledge and skill is unlikely to satisfactorily address the issue given the inherently cruel and violent nature of hunting.

#### *Declining populations and threatened species*

15. The 2025 Eastern Australian Waterbird Aerial Survey revealed that most game species of duck had populations well below their long-term average.<sup>8</sup> Overall, Australian waterbird populations declined almost 50 per cent between 2023 to 2024. These continuing catastrophic declines correlate with habitat loss and volatile weather conditions.

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<sup>2</sup> During Parliament's Inquiry into Victoria's Recreational Native Bird Hunting Arrangements, Dr Liz Walker of RSPCA gave evidence that in jurisdictions, such as Denmark, where such methods have been implemented, the wounding rate remains around 10%. This would approximately equate to over 26,000 birds based on Victoria's 2022 season.

<sup>3</sup> Select Committee Report, p 134.

<sup>4</sup> Ibid, p 145.

<sup>5</sup> Ibid.

<sup>6</sup> Game Management Authority, *Guidelines for Humane Dispatch of Downed Ducks* (May 2025) <https://www.gma.vic.gov.au/education/duck-hunting-education/guidelines-for-the-humane-dispatch-of-downed-ducks/Final-Revised-Guidelines-for-humane-dispatch-of-downed-ducks-2025.pdf>.

<sup>7</sup> Game Management Authority, *Summary Report of Hunters' Knowledge Survey Findings* (December 2020) <https://www.gma.vic.gov.au/research/hunting-research/GMA-Hunters-Knowledge-Survey-Report.pdf> ('GMA Survey').

<sup>8</sup> J.L Porter et al, *Easter Australian Waterbird Aerial Survey - October 2025 Annual Summary Report* (October 2025) <https://www.unsw.edu.au/content/dam/pdfs/science/ces/research-reports/2021-11-reports/Eastern%20Australia%20waterbird%20aerial%20survey%202025%20Final.pdf>.

16. Many waterways, particularly in Northern Victoria, are either dry or near dry. As of 11 March 2026, the Goulburn Murry Water website noted the following water levels:<sup>9</sup>
- a. Lake Hume: only 26% full (compared to 33% last year);
  - b. Lake Eildon: only 46% full (compared to 72% last year);
  - c. Lake Tullaroop: only 36% full (compared to 55% last year);
  - d. Lake Eppalock: only 37% full (compared to 67% last year); and
  - e. Cairn Curran Reservoir: only 28% full (compared to 49% last year).
17. These issues have likely further deteriorated as a result of the recent devastating bushfires across Victoria, which as of January 2026 had destroyed approximately 400,000 hectares of land across the state.<sup>10</sup>
18. GMA has estimated that hunters harvested 487,800 ducks and 48,000 stubble quail last year alone.<sup>11</sup> This does not include birds that were wounded or killed and not retrieved. The current season involves a 'bag limit' of nine birds, a notable increase from the four-bird bag limit prescribed in 2023.
19. In addition to the reduction of bird populations that are already under significant pressure due to environmental factors, there is also evidence that hunters incidentally or intentionally shoot native birds that are not permitted game species, including birds on the threatened species list.<sup>12</sup> Representatives of the Sporting Shooters Association of Australia (Victoria) have conceded that it is realistically inevitable that threatened species will be harmed during the native bird hunting season.<sup>13</sup>
20. The GMA Survey Findings showed that 80% of shooters could not identify game duck species that they were permitted to kill.<sup>14</sup> Further, hunters are permitted to commence shooting after sunset and after sunrise, increasing the risk that shooters will misidentify protected species. Some threatened species, such as Blue-winged Shovelers and Hardheads, have similar features to game species, thereby increasing the incidental shooting.
21. Moreover, threatened species likely face an increased risk of being wounded and not retrieved due to hunters avoiding associated penalties.
22. The environmental impact of native bird hunting also reaches beyond Victoria, noting that wetland habitat and water systems are deeply interconnected across eastern Australia. The Victorian Government therefore threatens national sustainability goals and interstate

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<sup>9</sup> Goulburn Murry Water, Storage Levels, March 2026 <https://www.g-mwater.com.au/water-operations/storage-levels>.

<sup>10</sup> The Guardian, *See how Victoria's Bushfires Spread: A Visual Guide to the Scale of Devastation* (16 January 2026) <https://www.theguardian.com/australia-news/2026/jan/16/how-victorian-bushfires-spread-maps-area-visual-guide#:~:text=Victoria%20has%20been%20battered,seen%20more%20devastation%20in%20communities.%E2%80%9D>.

<sup>11</sup> Game Management Authority, *2025 Gamebird Harvest Report* (12 February 2026) <https://www.gma.vic.gov.au/media-releases/2026/2025-gamebird-harvest-report>.

<sup>12</sup> Select Committee Report, p 13.

<sup>13</sup> Ibid p 72.

<sup>14</sup> GMA Survey.

cooperation by continuing to support native bird shooting.

23. There is no evidence to support the position that native bird shooting is either necessary or beneficial for environmental purposes, including to control native bird numbers or protect their habitat.

#### *Lack of compliance*

24. The rural location and size of hunting grounds and the number of licenced shooters impede effective monitoring to ensure compliance with laws and regulations. A majority of the GMA's resources are deployed to ensure public safety at a limited number of locations, at the expense of other compliance priorities including ensuring sustainable hunting, the humane treatment of game animals and minimising impacts on non-game and protected species.<sup>15</sup> Further, GMA survey findings indicate that the majority of hunters have a poor understanding of game hunting laws and approved hunting practice.<sup>16</sup>
25. A survey referred to in the Select Committee Report indicated that 74% of respondents had witnessed various illegal activities engaged in by native bird hunters including trespassing, littering, leaving behind wounded birds, shooting protected species, removing habitat and leaving campfires unattended.<sup>17</sup> The Select Committee also received evidence of damage to Aboriginal cultural heritage sites allegedly caused by duck hunters.<sup>18</sup>
26. Another example of non-compliance is the apparent continued use of lead-based ammunition for native bird hunting, which is prohibited due to the risks to wildlife, humans and the environment. During 2022, six shooters were identified using lead ammunition, and elevated lead levels were detected in ducks from multiple Victorian wetlands.<sup>19</sup>

#### *Community sentiment and impacts*

27. Independent research has indicated that two in three people across Victoria oppose duck hunting.<sup>20</sup> Victoria is well behind many other Australian jurisdictions in reflecting the prevailing public opinion and recognising the harm of this practice. States such as Queensland, New South Wales and Western Australia have banned native bird hunting up to three decades ago.<sup>21</sup> As stated by Premier Carmen Lawrence when recreational duck shooting was banned in Western Australia:

*Duck shooting runs counter to the environmental sensitivity to which our community increasingly aspires... There is widespread opposition throughout the community to the cruelty and environmental damage caused by shooters.*

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<sup>15</sup> Select Committee Report, p 125.

<sup>16</sup> GMA Survey.

<sup>17</sup> Select Committee Report, p 18.

<sup>18</sup> Ibid, p 91.

<sup>19</sup> ABC News, *Environmental Watchdog Investigating 'Elevated' Lead Levels in Ducks from Victorian Wetlands* (3 August 2022) <https://www.abc.net.au/news/2022-08-03/victoria-duck-hunting-lead-poisoning/101292288>.

<sup>20</sup> RSPCA Victoria engaged market research firm, Kantar, to assess Victorians' attitudes towards duck and quail hunting: [https://rspcavic.org/wp-content/uploads/2023/05/RSPCA-Vic-submission-to-recreational-native-bird-hunting-inquiry\\_ver-002.pdf](https://rspcavic.org/wp-content/uploads/2023/05/RSPCA-Vic-submission-to-recreational-native-bird-hunting-inquiry_ver-002.pdf).

<sup>21</sup> Western Australian since 1990, New South Wales since 1995 and Queensland since 2005.

28. During hunting season, a significant portion of public land is also used exclusively by hunters, preventing other members of the public from entering and using this land for alternative purposes, including nature-based tourism, First Nations led cultural tours and other outdoor recreation. Further, local residents have reported feeling unsafe and anxious, impacts on employment and distress caused to other animals due to bird shooting occurring near their residence.

## **Conclusion**

29. The shooting of native birds for recreational purposes is cruel, threatens declining populations and threatened species and is ineffectively monitored. The legality of this practice is also highly undemocratic, as it prioritises the interests of a miniscule portion of the population (approximately 0.26%), over the preference and concerns of the majority of Victorians.

30. The balance of the above-mentioned significant harms should be assessed against the benefit of maintaining this practice in Victoria, being simply recreation for a small percentage of Victorians. This recreation comes at the expense of irreparable harm to individual animals, entire species, the environment and the community. We note that there are numerous alternative activities available to native bird hunters involving similar skills and recreational elements, including clay target shooting, bird monitoring, eco-tourism and bushcraft.

31. Thank you for considering this submission. Should there be any queries, please do not hesitate to contact us via the email below.

Yours faithfully,

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