

Why I oppose recreational duck shooting and why it must be banned

Lynn Trakell
Secretary
Coalition Against Duck Shooting

Submission for the inquiry into Victoria's recreational native bird hunting

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Background

The announcements of recreational duck shooting seasons have caused me anguish and tears every year from when I first became aware that this activity took place, probably over 50 years ago. It was, and is, extremely upsetting to know that innocent native birds are going to be legally shot down purely for pleasure.

In 2000 I was in a position to act and felt compelled to do whatever I could to help. It is ethically and legally wrong to leave any sentient animal to suffer and although illegal to help native waterbirds prior to 10am on shooting wetlands, it is the right thing to do ethically, especially since there is no one else helping the wounded, suffering birds, not even the government which sanctions this barbaric activity.

Cruelty

The 2000 duck shooting opening weekend I attended with the Coalition Against Duck Shooting (CADS) left me totally dumbfounded. I couldn't believe that a civilized society could condone and even encourage its citizens to be involved in such disgusting behaviour. Witnessing young men cheering and shouting 'go Rambo' as defenceless and gentle birds fell into the water, wounded and writhing in agony, left me totally traumatised. The horror of this experience and all the subsequent years I have attended duck rescue have only strengthened my resolve to do everything I possibly can to help stop this atrocity.

Shooters say the badly behaved amongst them are just a very small minority but over my 22 years of attending duck rescue (and in 2003, 2007 and 2008 when moratoriums were called in Victoria I accompanied CADS to the Tasmanian openings) I have always seen shooters acting illegally, ie. shooting before and after the legal shooting times; shooting over the bag limit (and hearing shooters brag about doing this); shooting protected and threatened species; not bothering to recover wounded birds and leaving them to suffer on the wetlands; barbaric and cruel treatment of wounded birds such as ineffectively twirling birds by the head in attempts at killing (see photo example at right) and stuffing live birds into their bags or hanging them on their belts; allowing dogs to maul birds and leaving behind spent cartridge shells, camping rubbish, unburied toilets and used toilet paper to litter our wetlands.

When fired, shotguns scatter some 200 small pellets. At least one in four birds shot are wounded [*GMA and US ballistics expert Tom Roster*]. They suffer fractured or broken legs or legs/feet shot off entirely, shattered bills, splintered wings, pellets through eyes and shot lodged in organs, muscles and tendons.





Above: *Blinded by shotgun pellets*



Broken bones

Below:

Shattered bill

Foot injuries



Duck shooters had a chance to reduce the wounding rate by undertaking accuracy training in recent years. But fewer than 200 of the 25,000 licensed duck shooters bothered to improve their skills, so the program is now defunct. *[Info via FOI.]* GMA is now trying to use a Danish program to reduce wounding rates. But the Danes have been trying for 30 years and their best effort to date is a 10 per cent wounding rate. That would mean more than 30,000 native waterbirds writhing in pain in Victoria each year, which is unacceptable.

Reports of cruelty to birds are dismissed by the GMA who claim that because of nerve responses in dead birds, it is impossible to prove that flapping or moving birds are still alive and suffering when they are stuffed into shooters' bags or hung on their belts. But surely it should be up to the shooter to prove that the bird is dead and not suffering rather than witnesses having to prove that moving birds are still alive.

Waterfowl Wounding Reduction Action Plan (WWRAP)

Due to a successful FOI request, we are aware of the GMA's proposed Waterfowl Wounding Reduction Action Plan (WWRAP). This is quite a technical area so we asked one of our supporters for an analysis of the report (please see Attachment A). We conclude that the WWRAP will be an ongoing waste of money for Victorian taxpayers, and a smokescreen for ongoing cruelty to our native waterbirds.

Unregulated and uncontrolled

An assessment of the GMA's compliance and enforcement function by Pegasus Economics in 2017 was damning. This report was commissioned after the 2017 massacre of thousands of birds at the Koorangie Marshes near Kerang when GMA officers were present.

This year there are 21 GMA compliance officers to regulate duck shooting, but they can't possibly monitor all of the 20,000 Victorian wetlands [GMA figure] where duck shooting can take place in Victoria.

On the few wetlands that the GMA do monitor, they can't be present all of the time (from 8am to 30 minutes after sunset this year). Shooters do whatever they like if they think they aren't being watched.

But even when compliance officers are present, shooters still break the law. In 2015 at Lake Bullrush, CADS' rescuers saw a shooter take aim and illegally shoot a threatened Freckled Duck while a compliance officer was standing right beside him. Having to pass a one-off waterfowl identification test (which was introduced in 1990 to protect threatened Freckled Ducks) does not mean shooters can identify birds. When I attended the BirdLife Conservation Committee meetings some years ago, very experienced birdos told me that even they would have trouble distinguishing between flying game and threatened species.

In 2017 at the Koorangie Marshes and at Lake Murphy last year and this year at Lake Koynock in western Victoria, rescuers found un-breasted 'game' birds buried by shooters, presumably to hide the evidence of shooting above the bag limit. Yet compliance officers had visited at least the Koorangie Marshes and Lake Murphy and had presumably seen nothing.



Left: Illegally buried un-breasted birds recovered from Lake Koynock on the opening of the 2023 duck shooting season.

Some rescuers have reported illegal shooter behaviour to compliance officers who ignore the reports and instead book the rescuers for being on the wetlands before 10am.

Again this year, from just the small area around the north western town of Donald that our rescue team could monitor during the 5-day opening period, and despite a strong GMA presence, we once again witnessed illegal shooter behaviour, and this at a time when the shooters know their 'sport' is on the line and when there were a remarkably low number of shooters present.

We heard illegal shooting before the legal 8am opening time, we recovered shot threatened species (Blue-winged Shovelers, Hardhead and Freckled Duck), protected species (Black-tailed Native hen, Grebes, Eurasian Coot), we found a breasted illegally shot threatened Blue-winged Shoveler hidden in a tree hollow, collected spent shotgun cartridges left littering the wetlands, found shooters toilets less than 50m from the shoreline, saw shooters walking with unbroken guns, 'windmilling' birds to kill them, flushing birds into the air with a boat, wounding birds and failing to retrieve them before targeting other birds and not collecting dead shot birds. Please watch this short video of a rescuer at Lake Wooroonook on the opening of this year's duck shooting season: <https://youtu.be/YUOL9pfJIXE>

As mentioned, this was from a very small area over just five days when very few shooters were active. Altogether we recovered close to 100 birds, including those confiscated by the GMA. The carnage and suffering that goes unseen and unreported across the whole of Victoria during duck shooting seasons is incalculable.

Unsustainable

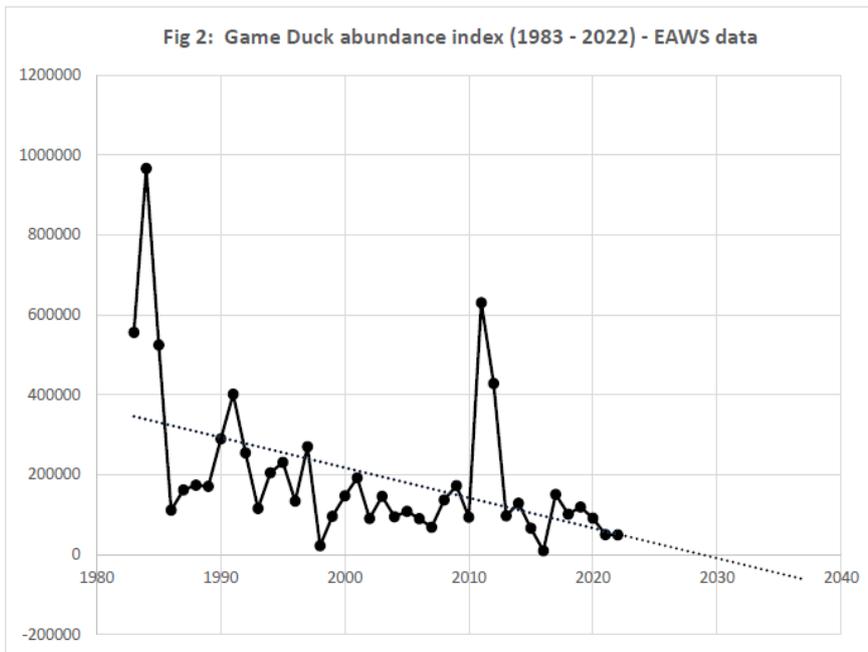
The GMA rely on feedback from shooters to determine the numbers of birds shot annually. When I first became involved in the early 2000s the estimated number was over 600,000 annually whereas today the average number over the last 14 years stands at 320,000 (which includes Covid years when there was very little shooting).

However, we know that most shooters across Victoria are un-monitored and that in their telephone surveys from the GMA they would not include any birds illegally shot above the bag limit or any illegally shot protected species. We also know that when a shooter pulls the trigger when targeting one bird, the fanned out shot can wound nearby birds that the shooter may not even notice. These birds (which should be included in the shooter's bag limit) will fly away and most likely suffer and die over time. So in reality, no one has any idea of the actual number of birds that are destroyed annually by duck shooters.

In this catastrophic era of climate change and extinctions it is ludicrous to state that duck shooting is sustainable and has no impact on bird numbers. The very fact that two game species (the Hardhead and Blue-winged Shoveler) have gone straight from the 'game' list onto the Victorian Flora and Fauna Guarantee Act 1988 threatened list speaks for itself.

There are desperate claims by shooters that duck shooting is sustainable with references to the new and unproven Adaptive Harvest Management Strategy and helicopter surveys of Victorian bird numbers etc, but there is absolutely no scientific reason for calling duck shooting seasons in the first place. The seasons are unnecessary, cruel and unpopular and are purely held for the recreational benefit of shooters.

We have no idea how many birds are shot annually, but what we do know (from Prof Richard Kingsford's annual aerial surveys since 1983) is that waterbird numbers are on a steady and dangerous decline due to a whole range of factors including climate change, hunting, wetland draining/deterioration, irrigation, pollution, human expansion etc (see graph below). Obviously banning duck shooting would only help slow this decline.



All birds should be fully protected 100% of the time to help avoid any species from spiralling onto the threatened list. According to Birdlife Australia, 31 Australian birds had gone extinct by 1990 and one in six Australian birds are currently threatened.

Source: Data from UNSW Eastern Australia Waterbird Survey (EAWS). Graphs from Animals Australia submission to Game Management Authority, Jan 2023, available from GMA website.

Environmental vandals

In their fervour to retain the ability to kill our native waterbirds, shooters try to hood-wink the public into believing they are so-called 'environmentalists', by rehabilitating wetlands and erecting nest boxes. But they only work on wetlands if they're allowed to shoot the birds attracted there. They were asked to help with the restoration of the Winton Wetlands but would only do so if allowed to shoot the birds. When this was denied they refused their help.

Nest boxes emblazoned with 'Field & Game Australia' can be seen on some wetlands, yet when bird numbers breed up the shooters say waterbirds are in plague proportions and must be controlled, despite having contributed to these numbers themselves through erecting nest boxes. They try to have it both ways. But many shooters don't understand that recreational duck shooting has nothing to do with controlling bird numbers. In the unlikely event that farmers have problems with native waterbirds they can apply for culling permits (but often ducks eat the blood worms and invertebrates that destroy crops, which is why Asian rice farmers encourage ducks onto their farms).

Australia's native waterbirds are perfectly adapted to the environment and require no interference from humans. They have existed for millions of years – well before any humans first inhabited this continent.

Shotguns have only been used for less than 250 years in Australia but the millions of birds shot during that time are impossible to determine.

Prior to the opening of the 2009 duck shooting season, the Coalition Against Duck Shooting caught Field and Game Australia illegally diverting water from the Latrobe River onto their private shooting property, Heart Morass near Sale. Farmers couldn't get irrigation water and were walking off the land at that time because of the devastating drought, but FGA stole the water because they'd sold shooting positions to their members for the opening weekend and Heart Morass was dry. They needed to attract birds to be shot. FGA's Gippsland wetland manager, Gary Howard, pleaded guilty to illegal diversion of water in the Sale Magistrates' Court on 23rd June 2009. He was fined \$1,500 (without conviction) and ordered to pay costs of \$1,500.

Apart from driving through farmers' fences and even shooting livestock, shooters also disrespect Indigenous heritage sites. They have chopped down scar trees to burn in their camp fires and camped on middens. They litter the wetlands with spent cartridges, general camping rubbish such as plastic or glass bottles and plastic wrapping and leave behind duck remains and unburied toilets.

All birds, animals and humans are terrorised on wetlands where duck shooting takes place. On the opening day last year when the guns went off at Lake Bael Bael, many thousands of birds took to the air, screeching in terror, including nesting swans which circled the wetland and then flew away – abandoning their eggs or young cygnets.

People living nearby hate duck seasons because of the noise, the injured birds, the litter, and because gunshot falls onto their rooves.

Killing for fun

Prior to farming, hunting was necessary for early man's survival (albeit without shotguns). But farming replaced hunting long ago and today no one in our culture needs to hunt to survive. Those who do hunt do so for fun - because they enjoy killing living creatures and this is sanctioned by the states still allowing recreational duck shooting. But because of a change in public opinion and in our culture, duck shooting is now regarded by the majority of Victorians as barbaric, unnecessary and unethical.

After paying for petrol, ammunition and all the paraphernalia involved in duck shooting it is far cheaper to buy food in supermarkets than to shoot native waterbirds for food and today shooters risk PFAS poisoning, botulism, and zoonotic pathogens, either bacterial, viral or parasitic when consuming wild birds.

At least one in four birds shot is wounded [*ballistics expert Tom Roster and GMA*]. Abattoirs with a one in four kill rate would be quickly closed down.

It is only in recent years and after rescuers exposed what takes place on the wetlands that shooters are now required to remove the breasts of all birds shot, or take them home, and also to collect shot birds before targeting other birds. But despite this requirement, we continually see shot birds left illegally on the wetlands because first and foremost, shooters enjoy the thrill of the kill.

Duck shooting is not sport. Sport is a contest between equals as in golf or tennis. Dressing in camouflage, hiding in hides, using decoys and duck callers and powerful shotguns against small defenceless birds is not sport.

Shooter intimidation

Many people who oppose duck shooting are intimidated by shooters and fear speaking out, especially in regional country areas, and with good reason.

Laurie Levy always knew how well the campaign was progressing from the number of threats he received from shooters.

Around 1986 he was warned by a contact in the Arthur Rylah Institute that a group of shooters with baseball bats were coming after him to put a stop to the campaign. A week later he received a call to say the baseball brigade had been called off because it would have been bad publicity for duck shooters. This was confirmed a number of years later after he was interviewed on Channel 10 together with a senior member of a shooting organisation, regarding the upcoming duck season. The shooter was upset by the outcome of the interview and while walking out with Laurie to the car park, amongst other abuse, he said that the biggest mistake he'd made in his life was calling off the baseball brigade. Levy agreed with him as his mistake had probably changed the course of the duck shooting issue.

In the 1990s, *Lock Stock and Barrel*, a Queensland hard-core shooters' militia magazine, specifically made public the home address of the late John Crook from Gun Control Australia and Levy from the Coalition Against Duck Shooting. The outcome was a few dead birds and human faeces stuffed in Levy's letterbox.

Later in the 1990s five cars and a motorbike were torched at 5am under the unit Levy was living in at that time. He assumed it was a couple of drunks but although not discovering the perpetrators, the police believed it was an attack on him because the sprinkler system had been turned off. The police advised him to park his car in different locations every night and to always check around inside his unit on returning home. He later discovered that the Police Force Special Branch had continued investigations for some time after the incident.

Levy was always listed in the phone book in order to receive important tip-offs and information from the public but also received many hundreds of harassing phone calls from shooters, especially leading up to opening weekends. This continues to this day.

Levy sees this abusive behaviour from the shooters as just part and parcel of the campaign but many people are intimidated by the shooters' bullying tactics and are reluctant to speak out – especially in small country areas.

Children and violence

Twelve year olds can legally handle lethal weapons and shoot ducks on our wetlands, even though they are too young to drive a car or vote.

Our youngsters should be learning to be compassionate and kind - not encouraged, and often bullied by their fathers (which rescuers have witnessed on the wetlands) into shotgun violence to native birds.

Prof. Eleonora Gullone, (Monash University) says *"The relationship between animal cruelty and human violence has been shown from childhood right through to adulthood. Killing for recreation exacerbates violence in the community. Children are particularly vulnerable to developing anti-social personality characteristics, compromised empathy and concern for others, when they are exposed to cruelty."*

Banned in WA (1990), NSW (1995), Qld (2005)

Nomadic 'game' species fly across state borders. When other states are in drought, native waterbirds fly from protection in those states, to Victoria to take sanctuary on our many wetlands – only to be shot by duck shooters.

The decision to ban duck shooting should reflect community concern about cruelty which is why duck shooting is illegal in WA, NSW and Qld. The ACT has never allowed duck shooting. Surely Victorians don't have less empathy for animals in pain.

Duck shooter numbers

The campaign to end the recreational shooting of native waterbirds commenced in 1986 when there were more than 100,000 Victorian duck shooters. Today, because our culture and public opinion has changed, there are around 25,000 licenced duck shooters, but of these, less than 11,000 are active (ie 0.16% of Victorians).

Thirty-seven years ago duck shooting was an accepted activity and two Victorian Premiers (Bolte and Hamer) were duck shooters. The Age published duck shooting lift-outs and duck shooting gear was sold in K-mart.

Today duck shooting is seen as cruel and depraved and the majority of Victorians want it banned. See 2007 Morgan Research Poll here: <https://www.duck.org.au/roy-morgan-poll-2007/>

Duck shooting over rice

Duck shooting over rice takes place under a culling permit system with quotas, which is so exploited and abused by shooters that they see it as a second Opening. It has nothing to do with recreational duck shooting. There are very few rice farms in Victoria (less than 1%), but once recreational duck shooting is banned, unless this exploited culling system is cleaned up, shooting on rice will continue as it does in NSW.

Economic benefits myth

Millions of taxpayer dollars are used to promote hunting and shooting in Victoria. Former Nationals Minister Peter Walsh set up a lucrative grants scheme for gun clubs and this largesse has continued under the current Victorian Labor government.

This flow of public money into the pockets of the gun lobby is justified by the myth that hunting is good for the regional economy. But it is the shooters themselves who say this and there have been no cost-benefit studies for duck shooting, only shooter-surveys where shooters claim to spend huge amounts; no one asks for receipts to check this! Other tourism activities suffer during duck shooting seasons. Taxpayers heavily subsidise duck shooting because hunting licences are far too cheap. Taxpayer-funded surveys of hunters have produced astronomical estimates of the amount of money that shooters allegedly spend.

In 2013 the first hunting survey claimed duck shooters injected \$99m into the economy. When averaged out among the number of ducks killed that year, shooters must have spent \$235 for each duck on their plate – an expensive way to eat! Perhaps no one checked the figures before printing the report.

The same survey claimed that hunting of all types contributed \$437m to the economy. But even the hunting lobby group Field and Game Australia wrote in their annual report: “The estimates in the [survey] report were far greater than anyone expected.”

The reality is that hunting deters non-hunting tourism, destroys the wildlife that visitors appreciate and shatters the rural peace that so many seek. In 2012 The Australia Institute published a report that found tourists were less likely to visit a region where duck shooting takes place and other Australian states suffered no economic loss after duck shooting was banned.

In 2020-21, tourism in Victoria was estimated to be worth \$10.7 billion to the economy. It completely dwarfs any inflated claims about the economic value of hunting.

During the life of the Andrews government, taxpayers have dug deep to support this cruel pastime (\$10.6m for the Sustainable Hunting Action plan; \$21.48m in grants to gun clubs; subsidies to GMA estimated at more than \$30m; \$11m to clean up lead pollution from shooting). The shooters have had a free ride for too long.

When there were 100,000 duck shooters in Victoria, they did contribute to the economy, but today there are so few duck shooters that some regional towns near once popular shooting areas (eg Boort, Donald etc) struggle to survive.

Last week the caretaker of the Donald caravan park told me he could remember large numbers of shooters turning up in Donald during duck shooting seasons in the late 1980s but because their numbers have dropped so much these days they make no impact on the town's economy at all.

Finally

After the 2017 opening weekend, I drove Laurie Levy to Harcourt near Bendigo, where he had arranged to speak with a Win TV news crew. Afterwards, when we stopped at a local café for a cup of tea before driving back to Melbourne, a tall, well-set man approached Laurie. He shook Laurie's hand and thanked him for all his efforts for native waterbirds. He said that he was a local landowner with a dam and had enjoyed watching a family of Wood Ducks grow from tiny fluff-balls into fully grown birds. But then tears rolled down his cheeks as he said that shooters had illegally entered his property that weekend and shot every single one of them. He was absolutely devastated.

It is now time to bring Victoria in line with the other three states that have banned recreational duck shooting. With the devastating impacts of climate change looming, our beautiful, sentient native waterbirds urgently need full protection and the recreational shooting of our native waterbirds by callous duck shooters must stop. It is now time to bring Victoria in line with the other three states that have banned recreational duck shooting.

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Thank you for considering my submission.

Lynn Trakell
8 May 2023



Female Mountain Duck – a 'game' species

Attachment A

Comments on the proposed Waterfowl Wounding Reduction Action Plan (WWRAP)

Introduction

The first observation relates to the secrecy of this WWRAP (referred to as “the Plan” from here on). Why was the Plan redacted in full from the Ministerial briefing for the 2023 duck season, available on the GMA website?

Fortunately a supporter of CADS had the foresight and persistence to make an FOI request to access the Plan and it was released.

The Plan purports to follow the Danish approach to wounding reduction for their hunted geese, namely the Pink-footed Geese. **The critical issue is whether the Plan would work here, and would it end the shocking cruelty that CADS observes on the wetlands every year. The answer is a very clear NO.** If the GMA had been impartial, it would have seen the futility of trying to import this Danish approach to our Victorian situation.

It is 3 years since two GMA executives travelled to Denmark in March 2020 to learn about this Danish approach. Information available from research papers (especially Clausen et al, 2017) would have been sufficient to show that the approach will not work in Victoria. There was no need for this taxpayer-funded travel.

In the three years since then, there has been no change in shooter skill or behaviour, so CADS continues to see shocking rates of wounding at the wetlands. Even when a bird is not immediately “downed,” you can see it “dip” in flight as the steel pellets hit the small body.

What did the Danes achieve and how long did this take?

The Danes commenced this work nearly 30 years ago in response to public concern about the high rate of geese carrying shrapnel from shotguns. An important part of the Danish program was that shooters were told they would not be allowed to hunt these geese unless there was significant improvement. However there is no mention of sanctions in the Plan. Instead, Victorian shooters are to be given “incentives” to encourage them to do some accuracy testing. The Danes did not offer any rewards.

It took more than 20 years to see a clear downward trend for the wounding in Denmark. **The Victorian community is not prepared to wait that long, or to fund it. The economical, humane and effective way to reduce wounding is to end the recreational shooting of native birds.** But the Danish achievement was to reduce the “crippling ratio” (see below) to 10%, meaning that one bird is crippled for every ten birds bagged. If Victoria reduced its “crippling ratio” to 10% that would mean 32,000 wounded, abandoned birds every year – an animal welfare abomination.

What has GMA done so far?

In a report recently released (referred to as “the wounding report” from here on), GMA describes its live-trapping of 596 ducks at five locations - three in the north-east (near Wangaratta) and two near Geelong, immediately after the shooting ended, from June to August 2022. Refer

https://www.gma.vic.gov.au/_data/assets/pdf_file/0010/938548/Wounding-Results-Report-2022-Final-Artwork-Low-Res-Email.pdf The ducks were x-rayed for shotgun pellets in their bodies.

The *Executive Summary* is misleading, as it confuses “infliction rate” (the percentage of x-rayed birds that carry shotgun pellets) with the more central issue of the number of birds that are wounded for every bird that is bagged (known as the “crippling ratio”). Not surprisingly, shooters have been on social media claiming that the average infliction rate of 3.4 per cent (from GMA’s field work) shows wounding is not a problem. Towards the back of the wounding report it is noted that young birds (that survived only one shooting season) had a higher infliction rate of 7.5 per cent.

Clausen et al (2017) provides the basis of the Danish approach. He pointed out that the percentage of birds with shrapnel will be influenced not just by shooters' skill but by *the proportion of the bird population that is being shot*. In Victoria, hunter participation is quite variable, as is the size of the duck population (our waterbirds are highly mobile), so the proportion of population being shot will vary year to year. The x-ray results on their own will not reveal the extent of the wounding problem.

Clausen proposed a method of calculating the "crippling ratio", defined as the number of birds wounded for every bird bagged. He divided the "infliction rate" (% of x-rays with pellets) by the "harvest rate" where:

Harvest rate = Harvest/bird population

For the 2022 season, the harvest rate = 262,567 / 2.9m = 0.09

(using the 2.9m population estimate from the Victorian helicopter survey in Oct-Nov 2021).

So the Crippling Ratio for young birds = 7.5 per cent / 0.09 = 0.075/0.09 = 0.83 or **83 per cent**

That is a shocking result, meaning that 8 birds are wounded for every ten birds bagged. No wonder GMA has declined to release this result. According to the Plan, GMA is not yet confident of its helicopter surveys of ducks and won't release the results of this "crippling ratio" calculation until 2025. This is the first time that GMA has expressed any doubts about the accuracy of its population estimates from aerial surveys of ducks in Victoria.

The 83% Crippling Ratio is a serious underestimate of the wounding (see p13):

*"The method of assessment used here can only sample the portion of birds that are sub-lethally wounded and survive. A limited number of studies have shown that **the majority of wounded birds will die and, as a consequence, are not available to be sampled.**"*

Other concerns with the WWRAP

- **It depends on shooters achieving "a strong culture of leadership and no tolerance for engaging in wounding-type behaviours," "raising hunter awareness" of the wounding issue and "ensuring hunter knowledge and proficiency."** Our observations since the 1980s suggest many shooters have no interest in reforms to improve animal welfare. This is shown by their behaviour at the wetlands, their abysmal attendance rate at the Shotgunning Education Program (SEP) and subsequent Masterclass, the abysmal results of GMA's 2020 Hunter Knowledge Survey, their resistance to testing existing licence holders, and their dismissive comments regarding GMA's wounding report. The reason authorities failed to hold anyone accountable for waterbird massacres at Box Flat (2013) and Koorangie Marshes (2017) is that shooters stayed loyal to the mates who engaged in wounding behaviours.
- **There is no proposal to test existing licence holders for shooting accuracy.** Only new shooters will be tested. But the existing shooters are the ones whose wounding behaviour has prompted this program. There will be "incentives" to entice existing shooters to pass tests. But the worst shooters won't want to do any tests, and they will perpetuate the worst behaviours. The proposed **online knowledge test for all** is easily flouted by getting "help" from friends.
- **Progress (if any) will be painfully slow:**
 - Despite clear evidence that wounding rates are significant, GMA will not include any estimate of wounding losses in "harvest" calculations for season arrangements – until 2026!
 - GMA will not release any calculation of the "crippling ratio" (number of birds wounded for each bird bagged) - until 2025!
 - Each year's calculation of the "crippling ratio" will inevitably be subject to dispute if it produces an unfavourable result (as it did this year); for example, claims that the sampled birds were not representative; the population estimate was wrong, etc.

- If there is no evidence of a trend of improvement, the WWRAP says mandatory training might be considered. Presumably the whole process would then have to be repeated...
- The Plan does not claim to achieve any changes quickly. It states (p5) that it will pursue an “incremental improvement strategy” because “*incremental improvement strategies are more likely to be successful in achieving behavioural change.*” Painfully slow progress, if any.
- Taxpayers will be funding this for years on end. There is no mention of costs. **The best way to stop the wounding is to stop the shooting!**

CONCLUSION

The WWRAP is an expensive smoke-screen to deflect valid community concerns about the cruelty of recreational bird shooting. It must be called out for what it is. No wonder it was kept secret. The only way to stop the cruelty is to end recreational bird hunting, as most other states have done.