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12 July 2022

NSW Government
Via hunting.stakeholders@dpi.nsw.gov.au

Remaking the Game and Feral Animal Control Regulation

Thank you for this opportunity to contribute to the important discussion and development of the 2022 **Remaking the Game and Feral Animal Control Regulation**.

FOUR PAWS is the global animal welfare organisation for animals under direct human influence, which reveals suffering, rescues animals in need and protects them. With offices worldwide, including Australia, our vision is a world where humans treat animals with respect, empathy and understanding. FOUR PAWS is also a core member of the Australian Alliance for Animals.

As part of the Proposals, we welcome the introduction of greater penalties for offences including releasing animals in the wild in order to hunt them or their descendants and hunting native game birds without proper licence and testing.

We also welcome proposed changes to convictions that licence applicants must declare when applying for a game hunting licence, the proposed change to allow licences to be suspended or cancelled if a licence holder is convicted in court of one of the specified offences, or is no longer a fit and proper person during the term of their licence, and the written permissions becoming a legislative requirement such as not harassing or harming livestock on public land and not laying bait or other attractants on public land.

We would like to emphasise, however, the following concerning key developments within the proposed regulations.

Proposal 4. A clause in the 2012 Regulation prohibits persons under 12 from applying for a game hunting licence. It is proposed this clause be removed to allow families to educate their children about safe hunting practices from a young age while ensuring their knowledge of the regulated hunting system in NSW (e.g. completing mandatory training).

Do you agree with the proposed change to the minimum age for game hunting licences?

FOUR PAWS Australia does not support this proposal.

The regulatory impact statement says that allowing children under 12 to hunt will strengthen family bonds and improve animal welfare by teaching children early in life how to hunt.

From an animal welfare perspective, however, it is alarming to consider that children under 12 will be responsible for the killing of an animal. This approach presents very high risk for prolonged animal suffering, as children are very young and inexperienced, nor will they have the physical capabilities to

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be entrusted with such a violent action and hunting alongside dogs who are trained to be aggressive in these situations.

The risk for body shots, for animals to be injured but not killed effectively, is very high.

Further, children using hunting weapons such as a bow-and-arrow and hunting alongside dogs who have been trained to be aggressive in these situations presents further high risks of the child injuring themselves, the dogs, and any person who is accompanying them.

There is also great concern of the impact exposing children to such violence will have on their mental health and behaviour.

Proposal 12. The current Regulation 2012 specifies that individuals under the age of 18 years must be supervised while hunting on public land, by a hunter who holds the same type of licence and written permission. It is proposed to lower the age for supervision to 16 years, but only for hunters using bows or dogs. Young people using bows or dogs to hunt do not have supervision requirements on private land.

Do you agree with the proposed change to allow hunters over the age of 16 who use bows or dogs to hunt unsupervised on public land?

FOUR PAWS Australia does not support this proposal.

It is well documented that teenagers are prone to risk-taking behaviour, that is why there are important restrictions around their participation in high-risk activities such as driving and consuming alcohol, to protect themselves and the public.

It is alarming to consider that children aged 16-18 years of age would be left responsible in a violent situation such as hunting, to not only be responsible for their own safety along with the safety of those with them, but to also be responsible for handling dogs who have been trained to be aggressive in these situations, and for the welfare of animals who they are hunting.

Individuals under the age of 18 should not have unsupervised access to weapons, as this is a great risk to the public.

Regarding Proposals 3, 5, 10, and 21

We are concerned that these Proposals will reduce oversight and regulatory control over hunting activities and compliance. Given the nature of hunting activities and the use of weapons, there should be greater regulatory oversight, not less. This is especially pertinent for areas of public land.

Additional Items for Consideration

Under The Game and Feral Animal Control Regulation (GFAC) 2012, Schedule 2 contains three important items that do not appear in this proposed version. These items should be included as they are important animal welfare considerations.

They are:

Schedule 2:

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5. Obligation to avoid suffering

An animal being hunted must not be inflicted with unnecessary pain. To achieve the aim of delivering a humane death to the hunted animal:

- a) it must be targeted so that a humane kill is likely, and**
- b) it must be shot within the reasonably accepted killing range of the firearm and ammunition or bow and arrow being used, and**
- c) the firearm and ammunition, bow and arrow, or other thing used must be such as can reasonably be expected to humanely kill an animal of the target species.**

6. Lactating females with dependent young

If a lactating female is killed, every reasonable effort must be made to locate and humanely kill any dependent young

7. Wounded animals

If an animal is wounded, the hunter must take all reasonable steps to locate it, so that it can be killed quickly and humanely.

FOUR PAWS believes that humans have a duty to at minimum take responsibility for and humanely address issues they have initiated or caused, including managing populations of introduced non-native animals who are considered to be damaging the local environment and impacting native animals.

When population control is required for the protection of biodiversity and animal welfare, humane and non-lethal methods of population control, such as fertility control, must be used when available. Lethal control should not be pursued, as it leads to significant animal suffering and does not have a lasting impact. Especially considering the scale of the issue in Australia. FOUR PAWS does not support the use of culling animals as a form of population management.

The development and use of humane, non-lethal methods of population control should be encouraged and supported by government, the scientific community and those concerned with animal welfare and the environment.

FOUR PAWS urges governments to work in collaboration with local animal protection organisations, to create long term and wholistic animal management plans which take a balanced view of the welfare of introduced species, alongside the welfare and conservation of native species.

Thank you for your consideration and the opportunity to contribute to this important regulation.

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