



NSW Inquiry into the Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill

Submission of the
Australian Veterinary Association Ltd

August 2025

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About the Australian Veterinary Association (AVA)

The AVA is the peak professional body representing veterinary professionals and students across Australia. For more than 100 years we have been the united voice of the veterinary profession.

Veterinarians are among Australia's most trusted and respected professionals, dedicated to safeguarding animal health and welfare and supporting the communities they live in.

Our vision and purpose

Vision A thriving veterinary profession

Purpose Building a vibrant future for veterinary professionals.

At the AVA we champion the veterinary community, advance professional excellence, foster connectivity, and deliver exceptional member experiences to achieve our vision of a thriving profession.

Essential role of the veterinary profession

Veterinary services are essential to Australia's animal health, food security, and economy. They help secure Australia's animal health and livestock supply chain, protecting hundreds of thousands of jobs and easing cost of living pressures through a safe and reliable food supply.

Beyond agriculture, veterinarians support companion animals and their owners, strengthening the human-animal bond and promoting the associated mental and physical health benefits of pet ownership. Animals are not just a part of the Australian way of life; they are deeply embedded in it - socially, culturally, environmentally, and economically, and veterinarians are an essential part of every vibrant Australian community.

Veterinarians play a pivotal role in maintaining the social licence of animal industries, ensuring animal health and welfare meets community expectations. Like human healthcare and education, veterinary services provide both private benefits to individuals and critical public benefits to society, in areas like biosecurity surveillance, wildlife treatment and health and emergency animal disease management.

Recognised among Australia's most ethical and trusted professionals, veterinarians are highly respected and trusted members of their communities. The Governance Institute of Australia's 2023 Ethics Index ranked veterinarians among the nation's top 10 ethical occupations¹.

INDUSTRY SNAPSHOT



¹ Meat and Livestock Australia State of the Industry Report 2022



Introduction

The Australian Veterinary Association (AVA) welcomes the opportunity to provide feedback to the Inquiry into Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill 2025.

Inquiry Terms of Reference are that:

- (1) the Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill 2025 be referred to the Standing Committee on State Development for inquiry and report.
- (2) That the committee report by 10 October 2025.

The objects of the Bill are:

- (a) to amend the Game and Feral Animal Control Act 2002 to—
 - (i) abolish the Game and Pest Management Advisory Board and replace it with the Conservation Hunting Authority, and
 - (ii) recognise and make provision for a right to hunt, and
 - (iii) abolish restricted game hunting licences and replace those licences with conservation hunting licences, and
 - (iv) provide that national park estate land must not be declared as land on which hunting is permitted,
- (b) to amend the Crown Land Management Act 2016 to establish the Crown land that is available for hunting and the mechanisms by which Crown land may be made available for hunting.

The submission draws on key AVA policies, including:

- AVA Statement of principles – animal welfare and ethics
- Hunting
- Control of native and introduced animals causing damage to agriculture or habitat
- Considering welfare of target and non-target animals in planning vertebrate control programs
- Control of feral horses and other equidae

This AVA submission was developed through consultation with the AVA NSW Division Committee, the Australian Veterinarians for Animal Welfare and Ethics (AVAWWE) Committee, the Australian Veterinary Conservation Biology (AVCB) Committee, the AVA NSW membership, and existing AVA policies.



Key Statements from AVA Policies

AVA Statement of principles – Animal welfare and ethics

Animals are sentient beings that are conscious, feel pain, and experience emotions²³. Animals and people have established relationships for mutual benefit for thousands of years.

Humans have a responsibility or duty of care to protect animals. Where a person does not meet his or her obligations to animals in his or her care, animals may suffer. When this happens, the law must be able to adequately intervene to enforce compliance and prevent suffering.

Animals have intrinsic value and should be treated humanely by the people who benefit from them. Owned animals should be safe from physical and psychological harm. They need access to water and species-appropriate shelter and food and should be able to fulfill their important behavioural and social needs. They must receive prompt veterinary care when required, and have as painless and stress-free a death as possible.

Animals can be used to benefit humans if they are humanely treated, but the benefit to people should be balanced with the cost to the animal. They should not be used in direct combat or for purposes where suffering, injury or distress is likely to be caused.

Humans should strive to provide positive experiences to promote a good life for the animals in their care. We should strive for continuous and incremental improvement in the treatment and welfare of animals.

Humans have a responsibility to care for the natural environment of free-living native animals. People should take steps to preserve endangered species, and protect native animals from disease where possible.

AVA Policy - Hunting

Terrestrial animals including birds should not be hunted purely for sport or recreation.

Where animals are killed for food, or as part of a government mandated feral animal control program, this must be regulated and conducted humanely. In these circumstances the Codes of Practice for the Humane Control of Vertebrate Pests and associated Standard Operating Procedures must be strictly adhered to and enforced.

Background: In general, recreational hunting and commercial harvesting alone have not been effective in limiting populations of pest animals or overabundant wildlife in Australia⁴⁵⁶⁷ or overseas⁸⁹¹⁰. Formal government feral animal control programs that are regulated and conducted humanely are the appropriate control mechanism.

AVA Policy - Control of native and introduced animals causing damage to agriculture or habitat

- 1. Control programs to protect the environment, social amenity and agriculture from invasive animals must be carried out humanely. They must use best practice methods based on scientific research, and must include monitoring and assessment for continual improvement.*
- 2. Humane control standards must be enshrined in legislation and methods known to be inhumane must not be used in Australia.*
- 3. Continual research must be undertaken to identify more humane options for control of pest animal species.*



Background: A large number of introduced animal species cause damage to natural ecosystems and agricultural lands. There are potential economic, conservation and welfare consequences if we fail to control these pest species.

Harvesting, culling and biological control are common tools used in management programs for animals regarded as pests. These controls are defined as follows:

- Harvesting is the taking of free-living animals for commercial, community or personal use. Scientific literature suggests that recreational hunting and commercial harvesting alone have not been effective in limiting populations of pest animals or overabundant wildlife in Australia (Gentle et al. 2011, Grigg & Pople 2001, Pople & Froese 2012, Pople & Grigg 1998) or overseas (Simard et al. 2013, VerCauteren et al. 2011, Sinclair 1997). However, in certain circumstances, targeted hunting may be effective in keeping populations in check (Hall & Gill 2005).*
- Culling is a procedure used primarily to reduce the population size of free-living animal species, and may or may not involve the utilisation of some or all of the animals that are killed.*
- Biological control generally implies the use of microorganisms or vertebrate or invertebrate predators, but can also include modified reproduction methods.*

At present, eradication of the major feral animal species is unlikely, except on off-shore islands and in predator-proof enclosures. The development of a wider range of effective and humane control options for pest animals is the subject of significant research effort in Australia and results are published and disseminated through State Governments and the Pest Smart website.

Recommendations

All control must be consistent with the Model codes of practice for the humane control of pest animal species and these codes should be adopted into all State government animal welfare legislation.

Control programs must have a firm scientific basis and take account of animal welfare. Methods should be rigorously evaluated and subjected to community consultation before being implemented and should be specific for the target species.

Control programs should aim to identify and minimise the unwanted impact of the pest species rather than simply controlling the species itself. The number of animals culled is not an indication of outcomes. Programs must be subject to monitoring and assessment of outcomes, including any unintended consequences, with a view to reassessing and updating controls accordingly. This in order to ensure efficacy and compliance with humane principles at all times.

Where possible, programs should be planned around seasonal breeding to minimise welfare impacts on unweaned offspring.

Decisions about the method of control should be guided by the Model for assessing the relative humaneness of pest animal control methods (Sharp and Saunders, 2008)

It is noted that rodent control is not covered in this model and there are no Codes of Practice or Standard Operating Procedures for rodents. Therefore, the AVA advocates the development of guidance documents for rodents.

Methods used to kill animals must be rapid and humane; participants in harvesting and/or culling operations must be adequately trained and demonstrate competency and methods used must have minimal effect on non-target species. Operators should also be aware of, and take precautions against diseases that can be transmitted from feral animals to humans or domestic animals (eg Brucella suis can be transmitted to humans or domestic dogs).

Landholders should be encouraged to undertake control programs in conjunction with neighbouring landholders (including crown lands) to maximise the effectiveness of the control program.



Biological control agents must have minimal effect on the normal behaviour and demeanour of the animal (unless such effects are part of the control objective). Where agents will cause death of some animals, death should be as rapid and as free from pain, apprehension or disorientation as possible. The level of these undesirable effects should be comparable with, or less than, effects caused by non-biological control agents. Individuals that recover should be minimally affected.

There are five methods of control currently available that have been assessed as inhumane (Sharp and Saunders 2008) and should not be used in Australia. These are

- *CSSP (yellow phosphorus) for pig control*
- *Strychnine bait for dogs, foxes and cat*
- *Unmodified serrated jawed traps*
- *Warfarin bait for pigs*
- *Chloropicrin fumigation for rabbits*

The use of glue boards or drowning for rodent control is also inhumane (Mason and Litten 2003) and should not be used.

Policy references¹¹

AVA Policy - Considering welfare of target and non-target animals in planning vertebrate control programs

1. *Welfare assessment of vertebrate control programs should aim to quantify the welfare impacts on all target and non-target animals likely to be affected.*
2. *Consideration should be given to the number of individual animals involved and the magnitude of both positive and negative impacts.*
3. *Control programs should aim to maximise the net welfare of all target and non-target animals, rather than simply considering the direct effect on the program's target species.*
4. *Management techniques that have higher levels of public acceptance, but poor animal welfare outcomes, should not be chosen over less popular but more humane techniques.*
5. *Animal welfare should not be compromised by economic factors.*

Background

Introduced vertebrate animals have negative environmental, economic and social impacts. There are economic, conservation and welfare consequences to both inaction and human intervention.

The effects on the welfare and habitats of all individual animals that may benefit from a problem animal control program should be considered with equal regard to any negative welfare effects on the target and non-target animals.

Management of interspecific competition for an optimal outcome may in some cases require the reintroduction of native predators extinct from a control area, or the translocation of native predators to balance other anthropogenic change^{12 13}. Use of native predators for the management of introduced and overabundant animals would be appropriate where scientific assessment predicted a net positive effect on the welfare of all animals in the landscape and defined safeguards to be followed.

It should be acknowledged there are animal welfare consequences to delaying or failing to control problem animals¹⁴.



Best practice pest animal control incorporates community engagement and involvement in planning and initiation of a control program¹⁵.

Non-lethal removal methods or ex situ killing methods should not be assumed to be more humane than in situ killing methods. Management techniques that have higher levels of public acceptance (for example translocation) but poor animal welfare outcomes should not be chosen over less popular techniques that can be demonstrated to be more humane (for example, shooting). To maximize animal welfare control, programs should include proactive and scientifically designed peer reviewed audits and the use of independent observers¹⁶.

Whether directly by predation or competition, or indirectly by behavioural or habitat effects, invasive or over-abundant animals can impact the welfare of livestock and sympatric wildlife.

Algorithm: For the community of animals in a problem animal control program area

$$([Population\ sympatric\ animals] \times [positive\ effect\ on\ sympatric\ animal\ welfare]) - ([Population\ target\ animals] \times [negative\ effect\ on\ target\ animal\ welfare]) = net\ welfare\ change\ (in\ welfare\ /animal)$$

Because suboptimal control of target species will have an ongoing negative affect on many animals in the landscape, time can be included as a factor, and inactivity is compared with intervention.

$$([Population\ sympatric\ animals] \times [positive\ effect\ on\ sympatric\ animal\ welfare]) \times years\ inactivity) - ([Population\ target\ animals] \times [negative\ effect\ on\ target\ animal\ welfare]) \times years\ duration\ of\ program = net\ welfare\ change\ (in\ welfare-years\ / animal)$$

Guidelines

Harvesting, culling, trapping, shooting and biological control programs must have a firm scientific basis and take account of the net welfare of all individual animals affected, whether of the target species or not.

While biological control agents should have minimal effect on the normal behaviour and demeanour of the target animal (unless such effects are part of the control objective) the other vertebrate animals living in the area of the control program should equally have their welfare taken into consideration.

Welfare of all individuals in the affected biological community should be considered when the benefits and risks of a biological or non-biological control agent are evaluated.

Mistakes have been made with biological controls in the past so management programs using biological controls should use scientifically accepted principles.

AVA Feedback on the Bill Objects

The AVA does not support this Bill and the hunting of animals for sport or recreational purposes. The AVA does support the restriction of shooting activities to those conducted as part of government invasive species control programs, conducted by competent professional shooters, aimed at protecting and conserving native wildlife.

Conservation and Pest animal management programs should be grounded in ethical principles, guided by sound impact assessments, and evaluated for effectiveness. These programs must employ competent operators to achieve long-term outcomes¹⁷ and ensure animal welfare.

In his second reading speech, the Hon. Robert Borsak MLC said that: *The primary objectives of these amendments are to better enable conservation hunting on private and public lands to assist with control and management of introduced species of animals and to recognise hunting as a cultural*



activity by both Indigenous and non-Indigenous citizens of New South Wales that has a significant social and economic impact in the State.

Schedule 1

- (a) provide for a right to hunt for cultural, recreational or invasive species management purposes, in accordance with other relevant laws*

The AVA does not support the recognition of a general 'right to hunt' clause, as such recognition is unnecessary. Shooting should only occur within the context of authorised invasive species management programs.

Currently, individuals may hunt on private land where they have appropriate landholder permission and comply with regulatory requirements, including animal welfare laws. This level of access is considered reasonable and already provides ample opportunity for hunters.

The AVA does not support recreational hunting on Crown Land. However, it acknowledges that, where justified, government-mandated and supervised invasive animal control programs may be required in these areas.

With respect to cultural hunting, the AVA does not have a policy on Indigenous hunting practices but maintains that all hunting practices should aim to reduce stress, harm, and animal welfare impacts to the greatest extent possible, ensuring that any hunting is carried out using the most humane and effective methods to avoid unnecessary pain and suffering when an animal is killed.

The Inquiry Committee is encouraged to review existing legislation permitting cultural hunting, and engage in meaningful consultation, particularly with Traditional Custodians, to ensure cultural perspectives and practices are appropriately understood and respected. This is especially important in relation to activities impacting native species and in recognising the value of traditional ethnoecological knowledge when considering hunting activities.

- (b) require land managers when making a land management decision to consider hunting rights and whether hunting is feasible on the land.*

The AVA does not support the proposed amendment. It is not considered necessary or appropriate to legislate a requirement for land managers to consider hunting rights as part of land management decision-making processes.

Land managers already consider a broad range of environmental, biosecurity, animal welfare, and operational factors when determining appropriate land use. Embedding a legislative requirement to consider hunting rights risks unduly elevating a recreational activity above these evidence-based considerations. There is no demonstrated need to compel land managers through legislation to assess or accommodate hunting.

- (c) dissolve the Game and Pest Management Advisory Board, establish the Authority, and outline the membership, procedures and functions of the Authority. The Authority's functions would include advising on game and feral animal management, representing licensed hunters, and promoting research into feral and game animals, including the benefits of hunting.*

This amendment is not supported by the AVA. The proposed Conservation Hunting Authority is not necessary. Rather, the existing Game and Pest Management Advisory Board functions already includes;

- providing advice on game and feral animal control,
- representing the interests of licenced game hunters in matters arising under the *Game and Feral Animal Control Act 2022*.



- provide advice on expenditure for research from the Game & Pest Management Trust Fund,
- provide advice on education courses relating to hunting.

Available information suggests the proposed Conservation Hunting Authority may shift the balance of influence towards hunting interests, with potential for majority representation by hunting groups and authority to advise the Minister on matters such as the allocation of public funds.

Currently, the Game and Pest Management Advisory Board includes individuals with expertise, skills, or knowledge in veterinary science. Should a Conservation Hunting Authority be established (noting that AVA does not support this), it is strongly recommended that the membership structure be designed to support balanced, evidence-based, and informed decision-making.

To achieve this, membership should be limited to a maximum of three representatives from hunting organisations, with additional representation to include:

- One veterinarian nominated by the NSW Division of the Australian Veterinary Association (AVA), with expertise in conservation and animal welfare;
- One representative from an animal welfare organisation; and
- One individual with recognised expertise in invasive species management.

This broader representation would help ensure that public interest, animal welfare, and ecological management considerations are adequately reflected. Consideration could also be given to including provisions that members of the Authority are independent and not affiliated with any political party, to safeguard impartiality and public trust in its governance.

(d) prohibit the declaration of national park estate land as being available for hunting.

It is noted that National Parks are to be excluded under this proposal. However, clarification is sought regarding how this amendment would interact with joint management arrangements, such as those in place at Mutawintji National Park. Specifically:

- Would this affect existing rights or practices related to cultural hunting in jointly managed National Parks?
- Could it place unintended restrictions on land management activities in other National Parks across NSW?
- What are the potential implications for animal welfare and the broader environmental impact of opening additional public land to hunting?

Schedule 2 proposes to amend the Game and Feral Animal Control Regulation 2022 to insert references to general game hunting licences and conservation hunting licences.

The proposed amendment to the *Game and Feral Animal Control Regulation 2022* to insert references to general game hunting licences and conservation hunting licences, replacing the current Restricted licence (R-Licence) system, raises concerns regarding oversight, regulation, and public safety.

The existing R licence framework includes established controls and oversight mechanisms that help ensure licensed hunters meet required standards, including training and compliance with animal welfare and firearm safety regulations. Replacing this system with new licence categories, particularly if they are broader in scope or less clearly defined, risks weakening these safeguards.

A key concern is that a shift to general and conservation hunting licences may reduce the level of regulatory oversight, training requirements, and accountability currently associated with the R licence. Without clearly defined eligibility criteria, conditions, and enforcement mechanisms, there is potential



for misuse or non-compliance, which could have serious implications for animal welfare, environmental sustainability, and community safety.

If a new licensing system is to be introduced, it must be accompanied by robust regulatory frameworks that maintain or exceed the current standards. This includes:

- Mandatory competency-based training;
- Ongoing licence monitoring and enforcement;
- Clear definitions and conditions for each licence type;
- Transparent reporting and auditing of hunting activity.

Until such safeguards are assured, we do not support the transition away from the current R licence system. Any licensing reforms should be evidence-based, support best-practice wildlife and land management, and prioritise animal welfare and public interest.

Schedule 3 proposes to amend the Crown Land Act to enable hunting on designated areas of Crown land, including to:

(a) prescribe areas of Crown land to be reserved for hunting and set criteria for identifying suitable land

(b) require hunters on Crown land to hold a relevant licence and have the Minister's permission

(c) require land managers to consider hunting when preparing or reviewing management plans for designated land

(d) set out a list of designated land available for hunting.

The proposed Bill amendment to prescribe areas of Crown land to be reserved for hunting and set criteria for identifying suitable land raises several concerns regarding its necessity, implementation, and potential impact.

Currently, hunters can access privately owned land with the appropriate landholder consent, and this arrangement appears to be functioning effectively. Expanding access to public land is unnecessary.

Where appropriate, government agencies, forestry managers, and local councils already have the discretion to engage licensed hunters through formal and regulated programs. Mandating the use of public land for hunting or requiring land managers to incorporate hunting into their land management strategies, appears to remove this discretion and may not align with the goals of effective land or wildlife management.

Given these concerns, it is recommended that a more comprehensive risk assessment be undertaken to evaluate the necessity and implications of this proposal. Priority should be given to protecting animal welfare, supporting culturally significant land use, and ensuring that decisions around land use remain evidence-based and locally informed.

Schedule 4 proposes to amend the Forestry Act 2012 to include promoting hunting in forestry areas as an objective and requiring consultation with the Authority on certain management plans. It also proposes to amend the Weapons Prohibition Act 1998 to recognise conservation hunting as a genuine reason for possessing or using a weapon.

As outlined in our objection to the proposed expansion of hunting on Crown land (Schedule 3), we also object to the promotion of hunting on further public land, including NSW State Forests.

Public land should be managed in the broader public interest, with a primary focus on conservation, biodiversity protection, cultural values, and public safety. Elevating the promotion of hunting to a



statutory objective risks undermining these core values and may reduce flexibility for land managers to make evidence-based decisions.

Overall, these proposed amendments appear to promote hunting as an elevated objective in public land regulation, rather than maintaining its role as one of several tools within tightly regulated and evidence-based wildlife and land management programs. It is recommended that these proposed amendments not proceed.

Matters for Further Consideration

The following matters should be considered by the Inquiry Committee in its review of proposed amendments to the Game and Feral Animal Control legislation.

Animal Welfare

Recreational hunting poses significant animal welfare risks, particularly when conducted by individuals without appropriate training or oversight. One of the most critical concerns is the high potential for non-fatal wounding. Inaccurate shots can result in severe injury and prolonged suffering, especially for animals that escape and are not promptly euthanised. Chest shots, commonly used, particularly in the pursuit of 'trophy' species are less likely to cause immediate death compared to head shots, which require a higher level of skill and precision.

Only highly competent shooters, who can reliably deliver a fatal head shot, should be permitted to shoot animals under any circumstances. The need for high standards of marksmanship is critical to minimise pain and distress. This approach aligns with the principles outlined in [the relative humaneness model](#), which evaluates both the animal's experiences prior to death and the humaneness of the killing method itself.

In addition to the risks of wounding, there are broader welfare concerns associated with recreational hunting, including:

- Limited regulation of hunting methods and techniques: In many cases, there are inadequate controls over how hunting is conducted, with a lack of mandatory training or assessment of practical competency prior to participation.
- Orphaning of dependent young: Hunting during breeding seasons or without sufficient knowledge of animal biology may lead to the killing of lactating females or parental animals, resulting in the death of dependent offspring due to starvation or predation.

Wounding rates vary between species, weapon types, and the skill level of the shooter. There is a need for more robust, evidence-based data collection and reporting in this area to inform appropriate regulation and risk mitigation strategies. Hunting practices should be continually assessed against welfare benchmarks and current scientific knowledge, with animal welfare considerations prioritised above recreational objectives.

Effectiveness of Recreational Shooting on Invasive Species Management

Effective invasive animal management relies on integrated strategies tailored to the species and specific environmental context. Ground shooting is just one of many available control methods and should not be relied upon in isolation. In some cases, it may even be counterproductive. For example, in the management of feral pigs, recreational shooting has been shown to disperse populations, undermining coordinated control efforts.



Research by Bengsen and Sparkes (2016)¹⁸ found insufficient evidence that recreational hunting of pigs on public land is an effective population control method. Such findings reinforce the need for structured, professionally managed control programs rather than ad hoc recreational hunting.

Ground shooting programs on public lands should only be conducted under government supervision using trained and competency-assessed operators. These operators must adhere to the relevant codes of practice and standard operating procedures, which are publicly available through PestSmart and apply to key invasive species including pigs, deer, goats, feral cats, and horses. Mandatory compliance with these standards is critical to ensuring that invasive species control efforts are both humane and effective.

In the case of feral cats and dogs, lethal control methods may also disrupt social structures, potentially increasing negative impacts such as aggression or predation. A growing body of literature, particularly from Canadian and northern hemisphere contexts, shows that culling of feral cats and dogs is not a sustainable long-term strategy. These approaches often fail to address the underlying human-related drivers of population growth, such as abandonment, lack of desexing, and inadequate regulation of ownership.

This highlights the importance of holistic management strategies that target both symptoms and root causes of invasive species issues. Successful programs must incorporate effective monitoring and evaluation frameworks that assess actual outcomes such as reductions in environmental or public health impacts rather than simply measuring outputs like the number of animals culled.

In summary, invasive species management must be strategic, humane, and evidence based. Overreliance on recreational hunting methods is not only ineffective but may exacerbate existing problems.

Legislative Harmonisation

Any amendments to the Game and Feral Animal Legislation must ensure harmonising with existing NSW environment, land management, and animal welfare legislations, such as aligning the *Prevention of Cruelty to Animals Act 1979* (POCTA). For hunting and invasive species management laws it is essential to ensure consistency, avoid regulatory gaps, and uphold animal welfare standards.

Furthermore, consistency with other Australian states and territories is also important. Invasive species management requires cross-border coordination, and shared standards to help prevent loopholes, improve enforcement, and support more effective, humane outcomes. Any legislative reform should be informed by national best practice, scientific evidence, and a commitment to ethical management of animals across all jurisdictions.

Categories for Hunting Purposes: Recreation, Food, Cultural, Invasive Species Control

Hunting encompasses a wide range of activities, including recreational hunting, hunting for food, cultural hunting, and conservation hunting for invasive species population control. These hunting purposes are fundamentally different and should not be treated as equivalent from a legislative or policy perspective.

Each form of hunting involves distinct motivations, methods, and expected outcomes. Recreational or sport hunting is often motivated by personal enjoyment or challenge, while hunting for food may reflect cultural practices or subsistence needs. Invasive species population control, on the other hand, is typically conducted as part of strategic invasive species or wildlife management programs.

These differing purposes require separate frameworks for assessing effectiveness, risk, and animal welfare. Importantly, the welfare of the animals involved, whether they are hunted, wounded, or killed



must remain a primary consideration in every context. Humane killing outcomes cannot be assumed simply because hunting occurs under a particular ‘conservation’ label.

Without clear definitions and distinctions between these purposes, there is a risk of regulatory confusion, misapplication of standards, and compromised animal welfare. Such clarification would support more coherent policy development, informed public debate, and better outcomes for both animal welfare and environmental management.

Bounties for Pest Control

Bounties have recently been raised in the media as a potential tool for invasive species management. However, there are significant concerns regarding their effectiveness, animal welfare implications, and vulnerability to misuse. Evidence from Australia and overseas has demonstrated that bounty systems are largely ineffective in achieving long-term pest control outcomes and are prone to fraud¹⁹.

Rather than supporting strategic, evidence-based approaches grounded in impact assessment, bounty schemes incentivise individuals to simply provide proof that a target species has been killed regardless of how, where, or why. This can result in substandard and often inhumane killing methods, increasing the risk of animal suffering and unintended ecological consequences.

Financial incentivisation may also alter the profile of participants, shifting from recreational or sport hunters with some level of skill and experience, to individuals primarily motivated by financial reward. This increases the likelihood of unskilled or unethical practices, further undermining animal welfare and public safety.

Importantly, funds allocated to bounty programs divert limited resources away from coordinated and humane pest management strategies that are scientifically informed and more effective in the long term. Integrated programs involving habitat management, monitoring, community engagement, and professional control methods are far more likely to achieve sustainable outcomes.

Even within the broader context of vertebrate pest control, recreational hunting presents well-documented limitations in terms of efficacy. The use of bounty schemes exacerbates these issues and has been explicitly criticised by expert bodies, including the Invasive Species Council.

Attachment A provides a short literature review on the use of bounties for pest animal control.

Bow Hunting

Some recreational hunters use a bow and arrow to hunt animals; however, this method raises serious animal welfare concerns. Bow hunting is generally considered inhumane due to high wounding rates and delayed death. Chest shots are typically used, resulting in death from blood loss rather than immediate loss of consciousness followed by brain dysfunction, which is the standard for humane killing²⁰. Unlike firearms, which can reliably deliver a fatal head shot when used by a skilled shooter, bow hunting rarely achieves an immediate and humane death.

It is recommended that bow hunting of animals not be permitted under any conservation or recreational hunting frameworks.

There is a need for further research and review of current literature to understand wounding rates, species-specific impacts, and potential risks to non-target animals. While bow hunting may reduce audible disturbance and thus minimise stress to nearby fauna, these potential benefits do not outweigh the ethical and welfare concerns associated with its use.

In summary, bow hunting poses unacceptable risks to animal welfare and should not be permitted as a method of recreational or conservation hunting in NSW or elsewhere in Australia.



Hunting Using Dogs

The use of dogs in recreational hunting, particularly for species such as deer and pigs, poses significant animal welfare and biosecurity risks. Welfare concerns arise not only for the target species, many of which may suffer severe injury or distress during pursuit and capture but also for non-target wildlife and the dogs themselves²¹.

This practice can result in prolonged chases, physical trauma, and increased stress for animals, and may lead to injuries to dogs during confrontations with large or aggressive species such as feral pigs. Additionally, the use of dogs increases the risk of disturbing native fauna, including protected or threatened species, and raises serious concerns regarding the humane treatment of all animals involved.

There is also a risk of zoonotic disease transmission, both to humans and among animals. Close contact between dogs and wild animals during hunts can facilitate the spread of pathogens, including *Brucella suis*, *Leptospira spp.*, and other infectious agents, posing public health and animal biosecurity concerns.

The AVA Hunting Policy States: *Dogs should not be used in the hunting of animals, except where they are used purely to locate or flush out animals and as part of a formal government control program (e.g. dogs used in island eradication campaigns to find the last few individuals in a population of feral animals). Dogs must not be permitted to pursue, corner or attack the animals. The use of dogs to hold or bring down feral pigs has adverse welfare effects for both dogs and pigs and must not be permitted. The killing of feral pigs using dogs and knives or arrows is inhumane. Additionally the use of dogs to hunt pigs is usually an ineffective method of control.*

In summary, the use of dogs in recreational hunting should be prohibited due to the associated risks, and permitted only in tightly controlled, professional contexts as part of strategic pest management programs.

Lead ammunition

The continued use of lead ammunition in NSW presents significant risks to wildlife and the environment. Lead fragments left in carcasses or scattered in the environment can be ingested by scavenging or predatory animals, resulting in toxic exposure. This is particularly concerning for birds such as raptors and waterfowl, which are highly susceptible to lead poisoning. Sub-lethal exposure can also impair reproduction, behaviour, and immune function, compounding conservation challenges for vulnerable species.

Internationally, jurisdictions are increasingly moving to ban or restrict lead-based ammunition due to these well-documented impacts. The United Kingdom, for example, recently announced a ban on lead bullets, a move expected to prevent the deaths of tens of thousands of birds annually from lead poisoning²².

In addition to wildlife impacts, lead ammunition poses risks to domestic animals, human health (particularly in cases where hunted meat is consumed), and soil and water contamination. Non-toxic alternatives, such as copper or steel ammunition, are readily available and increasingly affordable, offering a more sustainable and responsible approach.

Given these risks, the use of lead ammunition in NSW should be reviewed with a view to phasing out its use across all hunting activities. This would align with international best practice and contribute to improved environmental and animal welfare outcomes.



Public Safety

The Australian Gun Safety Alliance (AGSA) has raised serious concerns that the proposed Bill poses a significant threat to public safety.

The Bill's proposal to expanding hunting access on public land risks undermining Australia's strong firearm safety framework established under the National Firearms Agreement.

Allowing more individuals to hunt on public land increases the risk of accidental injury or death, especially in areas also used by bushwalkers, campers, and other recreational users. The risk is compounded if hunting is permitted without strict oversight and competency checks.

International experience reinforces these risks. In New Zealand, multiple fatalities have occurred due to misidentification, accidental shootings, and dangerous terrain²³.

Public land should be managed for the use and safety of all users. Expanding hunting on public lands compromises this principle and puts the broader community at risk.

Kangaroos and other native fauna

The Bill is not explicitly about kangaroos, its provisions for hunting for cultural purposes could potentially include them. These risks undermining the existing, regulated commercial framework involving First Nations people. Although cultural hunting is a recognised and valued practice, further evidence is needed to determine its contribution to conservation and pest management outcomes.

Whilst the proposed Bill does not reference existing regulations under the NSW Kangaroo Management Plan, nor the requirement to adhere to the *National Code of Practice for the Humane Shooting of Kangaroos and Wallabies*. Without this, recreational or cultural hunting of kangaroos on public lands may occur outside humane standards, leading to poor welfare outcomes, including inhumane killing and harm to dependent young.

It is essential that all forms of kangaroo hunting remain subject to clear legislation and regulatory integrity.

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Attachment A: Short Literature Review On The Use of Bounties for Pest Animal Control

The effectiveness of bounties has been extensively reviewed.

In the mid **1970's** the national Vertebrate Pests Committee and a Committee of Inquiry into Animal and Plant Pests in Queensland both recommended the phasing out or abolition of existing bounties.

A later report (Smith **1990**) concluded that bounties:

- Are counter-productive to more efficient, longer term control options;
- Utilise funds better spent elsewhere;
- Financial accountability is difficult to enforce under this type of system;
- Provide financial incentive not to participate in more effective programs;
- Can result in no appreciable reduction in number of pest animals

A **1995** commonwealth publication on fox management reported the ineffectiveness of a bounty scheme for foxes in Western Australia 1928–56. Over this period there was a marked upward trend in the number of animals being submitted for bounty payments each year indicating that the fox population was not being reduced.

A **1998** review by Hassall and Associates confirmed that bounties had limited value for controlling wide-spread pest species, provided poor return on investment and were often counterproductive. Only on small isolated populations of pest animals had bounties been a successful management tool and even then required a high level of supervision.

The review of the **2002/2003** Victorian fox bounty trial found that bounties had no effective impact on fox numbers, had a number of serious inherent problems and recommended that bounties not be continued. There were considerable administration costs associated with the scheme and “fraud” associated with fox tails being submitted from stockpiled furs, roadkills and interstate. The bounty review recommended that the scheme be discontinued and replaced with coordinated regional baiting programs.

These and other reports have concluded that bounties are a clumsy and inefficient tool requiring considerable supervision and are unlikely to deliver long-term reductions in pest animal populations and related damage.

Summary of Problems with Bounties

- Susceptibility to fraud – e.g. taking animals/scalps from areas where they are easier to obtain rather than the target area.
- Failure to produce a significant decrease in pest animal populations
- Long-term bounties can promote the deliberate spread of pest animals and facilitation of pest animal breeding (e.g. releasing female and young animals)
- Bounties have to be very high to induce participation and have to increase if pest animal density becomes lower and search time increases. This makes them a potentially expensive approach to pest control.

Positive attributes of Bounties

The **2004 Economic Assessment of the Impact of Wild Dogs** noted that:

No-one is claiming that a bounty, on its own, can seriously reduce wild dog numbers.

However, a bounty could be a useful part of a robust strategy that attempts to address the full array of circumstance. Apart from its capacity to act on ‘problem’ dogs, a bounty is seen to have desirable



social impacts. For example, bounty payments are directly proportional to effort, and there can be little doubt that most payments would go to people in financial need and, possibly, to people with 'bush skills' (skills that Australia should be trying to preserve and propagate). At the margin, bounty payments should help to keep people in outback areas.

The 2008 Wild Dog Management Review found that:

A key issue that was raised at all public meetings and from many written submissions to this review was the inconsistency across the state regarding the use of bounties as a tool to control wild dogs. There was unanimous agreement on the use of incentive based programs, but disagreement arose as to how, when and where they should be used.

It was suggested by a grazier in Charleville that the bounty money being used by local governments is money that could be better used for baiting and other control programs.

There is a real opportunity for misuse and corruption in areas where bounties are a considerable amount of money, such as \$100 or more for a scalp. For example it was reported in public meetings that bounties are being used to subsidise incomes of roo shooters on cattle properties by harvesting wild dogs on properties that don't participate in coordinated control programs.

While the State Government does not promote the use of bounties, Local Governments are generally supportive of them in areas that are reporting wild dog problems due to public pressure and a misguided sense that 'a dead dog is a good dog'. Bounties should be used to support those people suffering from predation and investing a great deal of time and effort into reducing wild dog numbers as part of a wild dog control group or syndicate.

It is recommended therefore, that should local governments wish to continue using bounties as a form of wild dog management, guidelines be developed with input from a range of stakeholders and wild dog managers and implemented at a state level. In doing so, a more consistent and uniform approach will be achieved by local governments and perhaps bounties will be used much more effectively in reducing wild dog impacts. Bounties are best used as a 'clean up' tool, to rid the environment of those dogs difficult to capture using other control methods.

Extracts from Additional References

Source	Species	Detail
Allen, L. and Sparkes, E. (2001), The effect of dingo control on sheep and beef cattle in Queensland. <i>Journal of Applied Ecology</i> , 38: 76–87.	Dingo	This study examined five decades of historical data to evaluate the use and effect of dingo control on the distribution of sheep and beef cattle in Queensland. This paper cautions the use of bounties as a measure of relative abundance and illustrates how people's perception of a pest and the type of livestock they produce can affect their level of control effort and the control methods they use.
Choquenot, D., McIlroy J. and Korn, T. (1996) Managing Vertebrate Pests: Feral Pigs. Australian Government Publishing Service, Canberra.	Feral Pigs	Bounties have been viewed favourably at various times as providing several benefits. These include providing: • additional income for farmers, graziers and trappers, who in some cases depend on the extra income for a living (Laun 1971); • assistance to farmers and graziers by meeting part of the cost of control (Tomlinson 1957); • data on distribution, numbers, food habits, taxonomy and other important scientific information (Laun 1971);



		• an incentive to agricultural workers/employees to become more involved in animal pest control than may otherwise be the case (Smith 1990); • an incentive for individual 'killer pigs' to be destroyed (Tomlinson 1957); and • a measure of effectiveness or otherwise of current and past control programs (Smith 1990). It has been recognised for some time, however, that bounties have a substantial number of weaknesses as a means of controlling vertebrate pests. These include: • susceptibility to fraud (for example, transferring scalps from other areas where there is no (or less) bounty paid and substituting scalps of other animals) (Balser and Moyle 1958; Latham 1960; Rolls 1969; Breckwoldt 1988; Smith 1990; Hassall and Associates 1996); • failure to cause a significant decrease in pest animal populations (Balser and Moyle 1958; Rolls 1969; Smith 1990; Hassall and Associates 1996); • deliberately spreading pest animals (for example, rabbits) throughout the continent (Rolls 1969); • deliberately setting free females and young to provide future income (Balser and Moyle 1958; Rolls 1969); and • bounties have to be very high to induce participation, at which point costs exceed the total predation losses (Laun 1971). Bounties may be effective in managing feral animals if bounty payments increase in value substantially as the pest population decreases, thereby inducing hunters to seek out the few remaining animals before dishonest and fraudulent practices creep in (Jacobsen 1945; Gosling and Baker 1989; Smith 1990). For example, bounties could jeopardise more effective management programs if some landholders wish to try other less successful control measures in order to claim the bounty (Smith 1990). Governments now generally recognise that traditional bounties are ineffective as a pest control method.
Bureau of Resource Sciences and Australian Nature Conservation Agency Managing Vertebrate Pests: Feral Goats John Parkes, Robert Henzell and Greg Pickles Scientific editing	Feral Goats	Bounties on goats' ears have been paid in Western Australia to induce people mustering goats to kill unmarketable animals instead of releasing them. In 1977, the bounty was 50 cents (approximately equivalent to \$1.50 in 1994-95 values), increased to \$1 in 1978 (\$3.00 in 1994-95 values), but discontinued in 1985 as the scheme was considered of doubtful value. Over 120 000 bounties were paid between 1977 and 1985 (G. Pickles, APB, Western Australia, pers. comm. 1994).



JD Coleman - 2007 - envirolink.govt.nz	Mammals	Bounty Systems have been trialled against a range of mammal pests in New Zealand, including feral pigs, possums, goats and wild deer. Unfortunately, the effectiveness of most bounty systems relates to the cost of catching the pest. Consequently, they rarely lead to the targeting of low-density, critical areas, and do little to reduce numbers let alone eradicate local populations (Warburton et al 2000) All bounty systems established in New Zealand for use in the management of vertebrate pests have now been abandoned.
Solving Tree Squirrel Debarking Problems In Taiwan- -A Review <i>Proceedings Of The Tenth Vertebrate Pest Conference,</i> 1982 - Pao-Chang Kuo,	Tree Squirrels	The red-bellied tree squirrel has become a serious problem in forest protection, especially in the national forests, therefore measures have been taken to control their populations. Firstly, as an immediate action of squirrel control, a bounty for squirrel tails was instituted by the Taiwan Forestry Bureau for more than fifteen years. There was no evidence that the bounty helped very much. At least it did not stop the squirrel debarking problem.
Makundi, R., Ouge, N., Mwanjabe, P. (1999) Rodent pest management in East Africa – an ecological approach. Ecologically-Based Management of Rodent Pests (eds G.Singleton, L.Hinds, H.Leirs & Z.B.Zhang), pp. 460– 476. ACIAR, Canberra, Australia.	Rodents	Bounty schemes These were organised to control rodents, especially in plague outbreak areas. In Kilimanjaro region, Tanzania, Lurz (1913) reported a bounty scheme to control rodents in the 1912 plague outbreak. The scheme was introduced also to the Rukwa Valley in Tanzania to control rodent outbreaks in the late 1960s (Mkondya 1975). The bounty schemes were not sustainable for two main reasons—(i) financial resources were scarce and (ii) they made villagers less responsible for rodent control in the absence of payment. In addition, villagers viewed bounty schemes as an economic activity and, therefore, those who participated in killing rodents were not interested in altering the conditions that enabled rodents to multiply. This resulted in bounty schemes being successful in reducing numbers of rodents temporarily, but did not change the carrying capacity of suitable habitats for rodents within the villages
RM Timm <i>Wildlife Damage Management</i> 2007	Coyote	Board of Supervisors approved a \$1 bounty for every coyote taken, at the behest of Police Superintendent Leland Ford. This program was in effect from November 1937 through June 1938 and was one of the first formal efforts to control coyotes in the Los Angeles area. This program was begun in response to the concern that coyote depredation was having an impact on the region's poultry, livestock, and wild game. More than 650 coyotes were taken during this 8-month period (Anonymous 1938b). Gill (1965:66) noted this was a large number of coyotes considering the small amount paid, but the program was considered ineffective (Gill and Bonnett 1973:104).



Bartel, R.A. & Brunson, M.W. (2003) Effects of Utah's coyote bounty program on harvester behavior. <i>Wildlife Society Bulletin</i> , 31, 738–743.	Coyote	The effectiveness of bounty programs for predator control has been questioned for decades. In Utah a survey of 131 hunters who collected bounties found that motivation was to increase hunting opportunities. Most respondents turned in < 5 coyotes. Nearly half of the respondents reported increasing expenditures for coyote harvest as a result of the bounty system.
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Attachment A References²⁴

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² Footnote: Animals that are known to be both conscious and sentient include all of the vertebrates, and some classes of invertebrates such as cephalopods and some crustacea. Ongoing research may lead to inclusion of additional groups within this definition. Sentience is the capacity to experience emotions: pain, suffering, negative and positive affective states.

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