



**Biodiversity
Council**

Submission to Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill 2025 Parliamentary Inquiry

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About The Biodiversity Council

The Biodiversity Council brings together leading experts including Indigenous knowledge holders to promote evidence-based solutions to Australia's biodiversity crisis. The Council was founded by 11 universities with the support of Australian philanthropists.



Introduction

The Biodiversity Council welcomes the opportunity to provide feedback to the [Standing Committee on State Development's inquiry into the Game and Feral Animal Legislation Amendment \(Conservation Hunting\) Bill 2025](#).

Overall, the Biodiversity Council does not support the bill as the assumptions upon which it is based are not supported by the best available evidence. If enacted the proposed amendments to the *Game and Feral Animal Control Act 2002* risk substantial harm to environmental, social, cultural and economic values, including public safety and amenity.

Our understanding

The Bill amends the *Game and Feral Animal Control Act 2002* to:

- abolish the Game and Pest Management Advisory Board and replace it with the Conservation Hunting Authority,
- recognise and make provision for a right to hunt,
- abolish restricted game hunting licences and replace those licences with conservation hunting licences, and
- provide that national park estate land must not be declared as land on which hunting is permitted.

The Bill also amends 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 second reading speech for the Bill, states that the primary objectives of the 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.

As outlined in the second reading speech, the rationale for the amendments assume that recreational hunting plays an important role in controlling invasive species and that bounty schemes are a proven and effective tool to incentivise the community to control pest species. These assumptions are not supported by best available evidence.

This submission responds to these assumptions in the form of overarching comments, and outlines concerns with specific sections of the Bill.

Overarching comments

Recreational hunters do *not* play an important role in controlling invasive species such as feral pigs, European rabbits, red foxes and feral deer species in New South Wales.

Extensive evidence demonstrates that recreational hunting is not an effective method for sustained and effective population control of invasive species and preventing or minimising their associated impacts. While hunting kills individual invasive animals it does not occur at a scale or with sufficient coordination and strategy to produce significant population reduction of invasive animals and hence, nor their impacts. This is especially challenging for widespread species that reproduce rapidly, such as feral pigs, deer, foxes, goats and cats.

To be effective, [invasive species programs must reduce populations below their growth rate](#), and sustain efforts long-term or to the point of eradication. In the case of deer this means removing between a third and half the population (depending on the species), and for pigs it is approximately 70% of the population. This is simply not achievable through recreational shooting, especially for species that occur in dense vegetation and may also be cryptic in behaviour and hard to locate. The [RSPCA reports](#) that recreational hunting removed roughly the same number of feral pigs over a 6-year period in New South Wales that a well-planned feral pig management program did over several weeks.

[Effective and efficient management](#) requires different combinations of techniques depending on local context. Across most public land, coordinated baiting, trapping and aerial culling programs for invasive and feral species are the best way to achieve large population reductions and prevent or reduce environmental impacts. It is therefore critical that nothing is introduced that could impede these kinds of professional coordinated invasive animal management programs.

Rather than support invasive species management, recreational hunting can interrupt and disrupt professional control measures. Some hunters also deliberately maintain and spread invasive animal populations for the benefit of their future hunting opportunities.

The 2013 [Dunn Review](#) into the governance of the Game Council noted that

The review was advised feral animal control programs can have a variety of goals including removing whole populations, or controlling breeding populations. Sport hunting however is generally quite random and selective in terms of its target (for example large trophy males) and in some instances has a goal of leaving some for next time.

In 2024, the [Natural Resources Commission](#) reviewed invasive species management in NSW. In its over 140 page report, the Commission makes one reference to the role of recreational hunting, simply noting that

...while recreational hunting by itself does not result in effective pest management, it needs to be recognised that ground shooting can contribute to integrated control programs when used in conjunction with other major control techniques like aerial shooting and baiting.

The Biodiversity Council supports the use of professional shooting as part of well-planned and integrated control programs.

The Biodiversity Council does not support the use of recreational hunting as means of controlling invasive species.

Bounty schemes are *not* a proven and effective tool to incentivise the community to control pest species.

In the context of recreational hunting within invasive animal control, it is also important to note that bounties are [proven](#) to be [ineffective](#), are open to fraud and can [worsen](#) feral animal problems and animal [welfare](#).

An economic [evaluation](#) of the role of bounties in vertebrate pest management in Australia undertaken for the Australian Government's Bureau of Agricultural and Resource Economics and Sciences found:

Bounty schemes have been condemned by their implementing agencies as a costly, misguided and ineffective tool for addressing pest problems. Fraud has become synonymous with all bounty systems with well documented evidence of widespread abuse by scheme participants. Such payments are often introduced in the absence of an adequate assessment of alternative solutions to a perceived pest problem and as a response to political pressure. Such financial incentives also impede the implementation of potentially more efficient control tools such as poisoning and harbour destruction.

The Biodiversity Council does not support the introduction of bounty schemes.

Concerns with specific aspects of the Bill

Key aspects of the Bill that are of concern to the Biodiversity Council are:

- legislating the 'right to hunt'
- creating a Conservation Hunting Authority to replace the existing Game and Pest Management Advisory Board
- requiring public land managers to consider any impacts on recreational shooting before making land management decisions.

Legislating the 'right to hunt' (section 4A)

The Bill proposes to establish a 'right to hunt'.

Unlike Queensland, Victoria and the Australian Capital Territory, New South Wales has not enacted legislation specifically aimed at [protecting human rights](#). Basic rights, like the right to life, vote and equality before the law are not currently protected by legislation. It is incongruous, that the NSW Parliament would legislate a 'right to hunt' before any [internationally recognised human rights](#).

The 'right to hunt' sets an expectation that hunting should be given precedence over other considerations.

The Biodiversity Council does not support establishment of a 'Right to hunt'.

Conservation Hunting Authority (sections 7, 8 & 9 and definitions in section 4)

The Bill proposes replacing the existing Game and Pest Management Advisory Board with a Conservation Hunting Authority.

The Advisory Board is a skills-based board with representatives from regional NSW with expertise or skills in the “areas of pest management, wildlife, veterinary science, hunting, education and community engagement”. The current seven member board includes two hunters, two experts in wildlife and invasive species management, two farmers and a vet.

In contrast, the Conservation Hunting Authority will be dominated by recreational hunting interests. Of the seven voting members,¹ four are to be from hunting organizations identified in the regulations, with one wildlife management scientist, one person nominated by the Minister administering the *Aboriginal Land Rights Act 1983*, and one member of the public.

The Bill would create additional functions for the Authority including: making recommendations to the Minister about what public lands should be open for hunting, to liaise with public agencies about pest animal management and to promote research into “game, feral and pest animal management issues” and “the benefits of hunting, including for the development of regional economies, and the conservation of the natural environment and native animals, and the preservation of cultural practices.”

The inclusion of the term ‘conservation’ within the proposed authority name effectively amounts to greenwashing and will mislead the public. The object of the authority is not conservation.

The Biodiversity Council does not support replacing the Game and Pest Management Advisory Board with the Conservation Hunting Authority, including the name change, the change of membership and the additional function of researching the benefits of hunting.

Public land manager decision-making (section 4B)

The Bill would require managers of State Forests and Crown land reserves to consider the right to hunt and the practicability of facilitating hunting on the land when making land management decisions.

This requirement would apply to public agencies such as the Forestry Corporation of NSW and Local Land Services, and local councils, Aboriginal Land Councils and Committees of Management who manage Crown land.

[Plans of management](#) that guide decision-making for Crown land reserves are complex and include a variety of factors including the purpose of the public land, legislative restrictions, the value of cultural and natural assets and management of natural hazards. The community must be consulted in their development. It is inequitable and burdensome to elevate hunting, above any other considerations, in this decision-making context.

Even limiting this requirement to invasive species management programs is problematic. In its invasive species management review, the Natural Resources Commission stressed the importance of strategic planning and prioritisation, regional coordination to support

¹ The Bill specifies that the Conservation Hunting Authority would include a public servant as a non-voting member.

cross-tenure management and improved monitoring, evaluation and reporting. Requiring consideration of hunting rights in invasive species management programs has the potential to undermine the effectiveness of collaborative, cross-tenure approaches. For instance, if private landholders and national parks managers invest in significantly reducing the population of deer, but it is determined that a population be maintained in adjoining State Forest due to a 'right to hunt'. Given the economic and environmental impacts of invasive species, legislation should not be passed that prevents land managers from undertaking effective invasive management programs.

The Biodiversity Council does not support the additional obligations on land managers to consider hunting in their decisions.