

**INQUIRY INTO GAME AND FERAL ANIMAL
LEGISLATION AMENDMENT (CONSERVATION
HUNTING) BILL 2025**

Organisation: Cat Protection Society of NSW
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Submission from the Cat Protection Society of NSW

Standing Committee on State Development Inquiry into Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill 2025

Thank you for the opportunity to provide a submission.

About the Cat Protection Society of NSW

Our mission is to work with the community at all levels for the mutual benefit of cats, people and the natural environment. We do this by:

- Finding loving and responsible homes for cats in need
- Improving the quality of life for cats by educating the community about socially and environmentally responsible cat care
- Actively working with government and non-government agencies to promote and improve cat welfare
- Honouring the unique relationship between people and cats.

Submission summary

As an animal protection charity, we are concerned with animal welfare generally. One of our guiding principles is that every animal deserves to be treated humanely and with respect for their sentence. Any strategies seeking to promote conservation of native ecosystems must be humane.

The Cat Protection Society of NSW **objects** to the Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill 2025 because:

- Hunting is not an ethical or evidence-based conservation method, and bounties are widely discredited as costly, inhumane, and prone to corruption
- The proposed amendments to the Game and Feral Animal Control Act 2002 will put people and animals at risk
- Abolishing the Game and Pest Management Advisory Board and replacing it with the Conservation Hunting Authority will repeat the mistakes of the former Game Council of NSW
- This Conservation Hunting Bill is misleading and inconsistent with the Government's NSW Nature Strategy commitment because:
 - recreational hunting is not an effective or science-based method for animal population control and,
 - the Bill only furthers the interests of recreational hunters, not the broader public interest in conservation, cultural preservation, animal welfare or community recreation.

The Bill should be rejected.

Animal population management approaches must be ethical and evidence-based

The proposed amendments to the Game and Feral Animal Control Act 2002 will put people and animals at risk and do not offer an effective or humane animal population management approach.

The inherent cruelty of hunting, and its ineffectiveness as an animal population management strategy, are clearly detailed in *Recreational hunting and animal welfare, An RSPCA Australia Information Paper, (2017)*¹.

A One Welfare framework should be the approach in conservation policy development, which recognises the interconnection between animal welfare, human wellbeing and the environment, including biodiversity².

In considering the management of so-called pest or feral animal populations – animals introduced into the environment intentionally by humans – it is essential to take a One Welfare approach. A One Welfare approach is required because no animal species can be isolated as a separate entity; their lives are entwined with people, other animals and the environment around them. This means that there can be no generic approach to animal populations because they live in different circumstances and environments.

Conservation policies need to recognise that habitats are highly specific, and situations are unique. Justifications for controls, like hunting, must be based on real, not perceived harms, and consider the ethical implications.

Climate change and habitat loss are the major threats to Australian flora and fauna (and people), yet these threats are subsumed by moral panic around cats, and other animal populations labelled as pests or feral.

Government effort should be directed to local research and strategy development by animal population management specialists through the existing government biodiversity and conservation framework, not people who kill for sport. This is the only way to ensure a non-biased, ethical, safe and effective approach. A multifaceted, humane approach is needed, that respects sentience of all animals, prioritises the safety of all land users and is evidence-based ecological management.

We don't disagree there is an urgency to protecting our environment, we do disagree with elevating the interests of those who hunt for recreation into the sphere of conservation, where it does not belong.

¹ *Recreational hunting and animal welfare, An RSPCA Australia Information Paper*, December 2017, accessed on 2 August 2025 at <https://kb.rspca.org.au/wp-content/uploads/2018/11/Recreational-hunting-RSPCA-Information-Paper-Dec-2017.pdf>

² One Welfare, access on 2 August 2025 at <https://www.onewelfareworld.org/faq.html>

It is telling that recognised authorities on animal population control oppose this Bill, including the Invasive Species Council³, the Nature Conservation Council and the National Parks Association of NSW⁴ and the Biodiversity Council⁵.

Cats and other animal species do not belong in all environments but demonising them by sanctioning killing for sport distracts from the human-caused drivers of biodiversity loss. Allowing more public land to be accessed by recreational hunting poses a further risk to native animals, as there will be more incursion and risk of damage from humans into vulnerable habitats, and intentional or unintended injury and killing of native animals and damage to native flora.

A true conservation effort would be focussed on habitat protection – as the Government has committed to do in the NSW Plan for Nature.

Hunting can disrupt legitimate animal population management strategies, by dispersing animal populations to land not covered by population interventions, such as private land. It can also negatively impact on non-target species, such as native animals and agricultural animals.

Bounty hunting is known to be cruel and ineffective in reducing feral animal numbers, and subject to fraudulent practices⁶.

The proposed amendments to the Game and Feral Animal Control Act 2002 will put people and animals at risk

There is no way the Government can ensure increased hunting over the vast areas of land proposed by this Bill can be done humanely, safely or in accordance with any regulatory requirements. Effective monitoring and enforcement would be impossible, meaning that the

³ NSW government urged to reject Shooters Party deal over 'dangerous and misleading' hunting bill, Invasive Species Council, Media Release, 2 June 2025, accessed 2 August 2025 at <https://invasives.org.au/media-releases/nsw-government-urged-to-reject-shooters-party-deal-over-dangerous-and-misleading-hunting-bill/#:~:text=The%20Invasive%20Species%20Council%20is,state%20forests%20and%20crown%20land>

⁴ Shooting Lobby's Bill Puts Public Safety and Nature at Risk, Nature Conservation Council, Media Release, 4 June 2025, accessed on 2 August 2025 at https://www.nature.org.au/shooting_lobbys_bill_puts_public_safety_and_nature_at_risk

⁵ Science does not support proposed NSW hunting legislation – Bounties waste taxpayer dollars, Biodiversity Council, Media Release, 3 June 2025 accessed on 2 August 2025 at <https://biodiversitycouncil.org.au/news/science-does-not-support-proposed-nsw-hunting-legislation-1>

⁶ Should bounties be used in wild animal management programs?, RSPCA Knowledge Base, accessed on 2 August 2025 at <https://kb.rspca.org.au/knowledge-base/should-bounties-be-used-in-wild-animal-management-programs/> and *Economic Evaluation Of The Role Of Bounties In Vertebrate Pest Management*, Prepared for the Bureau Of Resource Sciences by Hassall & Associates P/L (1998), accessed on 2 August 2025 at <https://pestsmart.org.au/wp-content/uploads/sites/3/2020/06/Economic-evaluation-of-the-role-of-bounties.pdf>

Government cannot guarantee the people of the NSW that they are safe to use those lands, that hunters are competent or compliant, or that animal welfare practices are undertaken.

Hunting includes the use of guns, bows and arrows, knives and chasing animals with dogs and vehicles. Hunting is not a humane activity because⁷:

- Killing methods may not cause quick and painless deaths. Animals are often not killed instantly and suffer either because they are not retrieved by hunters, and therefore die of starvation or their untreated injuries, or suffer until they die from predation or a second round of gun or arrow shots, or stabbing by hunters
- Not all hunters will have the knowledge or motivation to minimise or end the suffering of animals they hunt
- Dependant young are left abandoned when parents are killed
- Animals are chased to the point of exhaustion by dogs or vehicles.

This Bill also increases the risk of violence towards people, either by accidental shooting in the act of hunting, or by the associated increase of gun ownership and use. The proposed permitted use of suppressors or silencers increases risks to other land users, such as bushwalkers and pets, who will be unable to hear the threat of guns nearby.

The links between gun ownership and domestic violence against women, in particular in regional and remote communities, is well researched and recognised internationally⁸. If the Government supports this Bill, then they can't say they care about women's safety. The Government cannot pretend it is prioritising preventing domestic and family violence when they are prioritising guns.

Public land should be safe and accessible for the whole community, and the interests of one group should not be elevated in the guise of conservation at the expense of the safe use by others. Rushing through legislation without properly considering the risks to public safety and existing animal population management strategies will not achieve the purported objectives. There are plenty of proven alternatives to hunting to humanely manage animal populations that should continue to be explored, such as habitat conservation and restoration, and fertility control.

⁷ *Recreational hunting and animal welfare*, An RSPCA Australia Information Paper, (2017), Ibid

⁸ *Factors associated with Family, domestic and sexual violence (FDSV)*, Australian Government Australian Institute of Health and Welfare, last updated 30 July 2025, accessed 4 August 2025 at <https://www.aihw.gov.au/family-domestic-and-sexual-violence/understanding-fdsv/factors-associated-with-fdsv#:~:text=People%20living%20in%20Australian%20regional,Tayton%202015%3B%20Noonan%20et%20al>

Intimate Partner Violence, Firearm Injuries and Homicides: A Health Justice Approach to Two Intersecting Public Health Crises, National Library of Medicine, National Centre for Biotechnology Information, Tobin-Tyler E. Intimate Partner Violence, Firearm Injuries and Homicides: A Health Justice Approach to Two Intersecting Public Health Crises. *Journal of Law, Medicine & Ethics*. 2023;51(1):64-76. doi:10.1017/jme.2023.41

Abolishing the Game and Pest Management Advisory Board and replacing it with the Conservation Hunting Authority will repeat the mistakes of the former Game Council of NSW

The Bill seeks to establish a Conservation Hunting Authority, while NSW continues to have no independent authority or responsible Minister for animal welfare, reflecting that the true motivations in this proposal are in the interest of a minority yet influential interest group, not in the broader public interest.

Instead of promoting the interests of those who kill for sport, the government should establish an independent animal welfare agency, unfettered by industry influence.

The proposed Conservation Hunting Authority would be dominated by recreational hunting interests who will use their power to influence how animal population control is undertaken on public land. Any consideration of conversation strategies should be made in a One Welfare context, with conservation experts through the frameworks, and in accordance with the principles of, the NSW Nature Strategy and the Australia's Strategy for Nature 2019-2030.

The government needs to draw on the learnings from the independent Governance Review of the Game Council of NSW undertaken for NSW Department of Primary Industries that highlighted governance issues that were deemed “unacceptable” and the “inherent conflict of interest associated with its functions to both represent the interests of hunters, and to regulate their activities”⁹.

There is an inherent conflict of interest for allowing recreational hunting to be undertaken in the name of conservation, as the goal of recreational hunting is to be able to continue to have animals to kill for sport, not to eradicate, reduce or otherwise manage the animal populations. This conflict of interest is clearly apparent in the hunting tourism industry, where the abundance of available animals to kill is promoted¹⁰.

Proposed section 9A.4¹¹ of the Bill, a Henry VIII provision, would allow this biased Authority with an inherent conflict of interest – reporting to a Minister for Hunting, not to a Minister for conservation, after consulting with the Conservation Hunting Authority, to unilaterally, without Parliamentary or community consultation, make decisions about what Crown land is designated as land on which hunting is permitted. This is an outrageous and dangerous overstep of authority of a statutory body.

⁹ Governance Review of the Game Council of NSW for NSW Department of Primary Industries, IC Independent Consulting, submitted 14 June 2013, Accessed 2 August 2025 at <https://invasives.org.au/wp-content/uploads/2014/07/Game-Council-Governance-Review-S-Dunn-14-June-2013.pdf>

¹⁰ Examples:

Hunting Trips Australia <https://huntingtrips.com.au/hunting-trips-tours-new-south-wales/>
High Country Hunting <https://www.highcountryhunting.com.au/>

¹¹ Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill 2025, <https://www.parliament.nsw.gov.au/bill/files/18752/First%20Print.pdf>

Hunting is a not a practice that should be protected or promoted by law

The Bill makes provision for the right to hunt and for a Minister for Hunting and Fishing, but no provision for the rights of animals as sentient beings or for a Minister of Animal Welfare. The Bill proposes an Authority that would report to a Minister for Hunting and Fishing, not a Minister with responsibility for the environment or conservation, or responsibility for community use of public lands. The Bill proposes the primary function of the Conservation Hunting Authority is to “represent the interests of licensed game hunters¹²”.

The proposed members of the Conservation Hunting Authority¹³ do not include identified positions for Indigenous people to provide advice on Aboriginal cultural hunting practices, nor an expert in animal welfare to provide advice on killing methods.

This shows that the Bill is entirely about furthering the interests of recreational hunters, not the broader public interest in conservation, cultural preservation, animal welfare or community recreation.

The Bill is misleading and inconsistent with the NSW Nature Strategy commitment

The Bill prioritises recreational killing over humane, inclusive land management.

Nowhere in the Government’s NSW Plan for Nature is recreational hunting mentioned in relation to the Government’s commitment to data-informed whole-of-government approaches to biodiversity¹⁴. The NSW Government committed to working with the community to design and deliver the wide range of the NSW Nature Strategy initiatives to ensure natural resources are managed in the social, economic and environmental interests of the state, not in the interests of the Shooters, Fishers and Farmers Party.

To refer to this Bill as a conservation initiative is entirely misleading.

Thank you to the Committee for your time and consideration.

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¹² Part 2, Section 9

¹³ Part 2, section 8

¹⁴ NSW plan for nature NSW Government response to the reviews of the Biodiversity Conservation Act 2016 and the native vegetation provisions of the Local Land Services Act 2013, July 2024, <https://www.nsw.gov.au/sites/default/files/noindex/2024-07/NSW%20plan%20for%20nature%20NSW%20Government%20response%20to%20the%20reviews%20of%20the%20Biodiversity%20Conservation%20Act%202016%20and%20the%20native%20vegetation%20provisions%20of%20the%20Local%20Land%20Services%20Act%202013.pdf>