

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

Organisation: Animal Care Australia Inc.

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Standing Committee on State Development

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Inquiry into Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill 2025

Animal Care Australia is a national incorporated association established to consult with government in advocating for real animal welfare by those who keep, breed and care for animals. Our goal is to promote and encourage high standards in all interactions with the animals in our care.

Animal Care Australia would like to thank the Standing Committee on State Development for the opportunity to provide this submission.

Animal Care Australia's core focus is on pet ownership and where broader matters of animal welfare may infringe upon a person's right or ability to keep animals. The current mismanagement and neglect by the government and in particular the NSW National Parks & Wildlife Service (NPWS) to control feral animals has a continued impact on those of us who keep animals.

The over abundance of foxes and feral cats results in aviaries, small mammal enclosures, chicken coops and more constantly being ravaged despite the best efforts of the animal owners to prevent and protect. Measures currently being utilised to control feral animals such as the mis-used and over-used 1080 baiting has resulted in a tragic increase in the unnecessary deaths of domestic pets, particularly dogs. The release of biological controls (viruses) to remove wild rabbits and hares without first developing and releasing strain-specific vaccines continues to result in pet rabbits suffering and dying unnecessarily.

Animal Care Australia does not believe Federal and State governments provide sufficient incentive, funding, or support in securing alternative methods, vaccines against currently used methods, and up to date scientific reviews of those methods and relies far too heavily on one particular organisation to justify the continued use of most of these methods.

With this in mind, **Animal Care Australia supports ethical and sustainable hunting where high animal welfare standards are practiced, reviewed, and regulated - where those regulations are adhered to.**

Animal Care Australia supports the use of licensed, professionally trained, and regulated hunting as a method of feral animal control, also known as conservation hunting.

Therefore, Animal Care Australia supports the Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill 2025, with the following recommendations:

Recommendation 1: Existing Standard Operating Procedures and Codes of Practice are reviewed and updated.

As members of this Standing Committee are aware, the recommendations from the *NSW Inquiry into the proposed aerial shooting of brumbies in Kosciuszko National Park* included:

Recommendation 3

That the training required of aerial shooters, as well as the type of firearms and ammunition (including both the calibre and the cartridge size of the ammunition) being used to aerially cull brumbies should be reviewed to ensure best practice.

and,

Recommendation 4:

That the New South Wales Government should have an appropriate, independent third party review the Standard Operating Procedure regularly to ensure it continues to reflect best practice and is as robust and humane as possible.

Animal Care Australia contends these two recommendations that were supported by the Government MUST be extended to include all existing Standard Operating Procedures, particularly given the proposed addition of camels to the list of non-indigenous game animals - the hunting of which on public land requires a licence.

Animal Care Australia notes the existing Code of Practice and Standard Operating Procedures for control of camels ¹ however it stipulates the same requirements as those for control of feral horses and yet it was ascertained (proven) the incorrect calibre and ammunition was being used by the Team undertaking the brumby culls AND being overseen by a 'so-called independent vet' and approved by the RSPCA NSW.

Recommendation 2: Broad consultation for review of Standard Operating Procedures

Animal Care Australia DOES NOT support the Government's response to the above Report recommendations 3 & 4 which included exclusive control of the review into Standard Operating Procedures and Codes of Practice by the National Parks & Wildlife Service with input from the RSPCA. We note an independent third party is included, however this is insufficient and should be expanded, particularly if the same independent party involved in the brumby cull is allocated by NPWS to meet this need.

Both organisations demonstrated an inability to correctly grasp what appropriate animal welfare outcomes should be.

Additionally, the current SOP's being utilised for control of different feral species are both national and state-based (the latter being predominantly Department of Primary Industries).

Therefore, the Department of Primary Industries, in partnership with the (newly assented) Conservation Hunting Authority, should conduct ALL reviews in consultation with key stakeholders. This must include animal welfare organisations, and other relevant organisations (which would include NPWS and RSPCA.) All previous and current government reliance on the RSPCA and NPWS is what created the outcomes outlined in the Report from the *NSW Inquiry into the proposed aerial shooting of brumbies in Kosciuszko National Park*.

Additional comments:

It is disappointing to note that regulated hunting of feral animals within national parks is not under consideration as a part of this Bill. Animal Care Australia notes proposed amendments that could change this.

We understand many new and remote national parks, when in private hands, had their feral animal populations managed by hunters and that this free service will no longer be permitted.

Animal Care Australia and our members are skeptical that NPWS has the resources to manage feral populations in these remote parks, especially in a manner that places animal welfare front and centre. A blanket ban on hunting in national parks has little to do with sound park management and more to do with curtailing to animal rights extremism and the need for NPWS to control rather than manage the parks.

Should you require further details please do not hesitate to reach out.

This submission can be publicly listed.

On behalf of the Animal Care Australia Committee,

Michael Donnelly
President

¹ [Code of Practice and Standard Operating Procedures for control of camels](#)