



Vegan Australia  
301/49 York Street, Sydney 2000  
Email: [info@veganaustralia.org.au](mailto:info@veganaustralia.org.au)  
Phone: 0400 492 157  
Web: [veganaustralia.org.au](http://veganaustralia.org.au)

29 July 2024

## **Submission on the proposed Victorian Wildlife (Game) Regulations 2024**

Vegan Australia is pleased to have the opportunity to provide a submission as part of the public consultation into the proposed Victorian Wildlife (Game) Regulations 2024. We hope this submission assists in the preparation of the final Regulations.

Vegan Australia is a national organisation that advocates for the rights of our fellow animals by informing the public about animal rights and veganism and presenting a strong voice for veganism to government, institutions, corporations and the media. Vegan Australia envisions a world where all animals live free from human use and ownership. The foundation of Vegan Australia is justice and fairness, for our fellow animals as well as for humans and the planet. The first step each of us should take to put this into action is to become vegan and to encourage others to do the same. Veganism is a rejection of the exploitation involved in commodifying and using sentient beings.

This consultation is an opportunity for the community to reflect on how the rights of our fellow free-living animals are violated by the practice of hunting for pleasure. It is an opportunity to consider alternative ways we can enjoy ourselves which do not involve the suffering and killing of these sentient animals.

### **Introduction**

This submission is based on the principle that all animals have the right to their own bodies, lives and freedom and no one else has the right to take these from them. We all have an obligation to respect and protect these rights.

This principle of animal rights should be the foundation of a remade Wildlife (Game) Regulations 2024. The focus should be on abolishing the use and exploitation of all animals, including the banning of hunting, both of native and non-native animals. All forms of hunting are unethical and unjust and violate the rights of our fellow animals. Vegan Australia suggests that the vision of the remade Regulations be

"To establish and uphold a society in which people respect the rights of all animals to their own bodies, lives and freedom and enable those animals to live their lives free of human exploitation, use and ownership."

The Regulations should focus on abolishing the use of animals (including hunting) instead of improving their welfare. Focusing on welfare improvement means failing to

address the underlying ethical issue, which is the belief that humans have the right to exploit our fellow animals for human benefit.

## **Animal welfare**

The Regulatory Impact Statement states that one of the major concerns of the Regulations is to "maximise animal welfare outcomes" for the animals being hunted and shot. For the Regulations to do what is best for the welfare of these animals, they should be remade to plan for the end of hunting.

The Impact Statement contain a number of areas that highlight the contradiction between the goal of "maximising animal welfare outcomes" and the practice of hunting. One example is the proposed requirement for a hunter to "make reasonable efforts to immediately" kill a deer they have shot and injured. This is a clear admission that being shot, injured or killed is not in the best interests of the welfare of the deer concerned. For however short or long the process might take, the deer will suffer and their right to their own life and bodily integrity will be violated. A better way to "improve animal welfare outcomes" for the deer would be to stop humans from attempting to kill them.

The Impact Statement also states that sometimes the killing of hunted animals may "not be as quick and humane as possible, leading to unnecessary pain and prolonged distress to the animal" and recommends that "wounded game should be dispatched as quickly as possible." It also states that the current Regulations require a hunter to "make all reasonable efforts to recover a downed bird immediately after it is struck. This is intended to improve the animal welfare outcomes."

All of the statements above (and many others in the Impact Statement) indicate that some level of pain and distress is inherent in the process of shooting and killing free-living animals. The best way to "minimise adverse animal welfare outcomes" would be to ban all hunting. This would also have a positive impact on the welfare of the dogs used in hunting.

None of the activities involved in hunting are 'necessary' and so in reference to the phrase "unnecessary pain" used above, it is evident that the pain and distress caused by hunting is all 'unnecessary' and hence should not be allowed.

Another contradiction is the recommendation to "protect gamebird populations" (by some limited measure). Again, to maximally protect gamebird populations, the hunting of the birds should be banned.

## **The violent nature of hunting**

Hunting is inherently a violent practice that is based on getting pleasure from brutally violating the rights and bodies of our fellow animals. The Victorian government should not be encouraging this behaviour, particularly when at the same time it is trying to stop other violence in the community, particularly violence perpetrated by men. Instead, the government should be educating and encouraging people to enjoy the beauty and wonder of nature without causing needless harm to our fellow animals simply for 'recreation'. It should promote a world where people treat others with respect and justice.

## **Evidence-based - sentience**

The remade Regulations should have a strong focus on evidence and science. There is now an overwhelming body of scientific evidence demonstrating that animals are sentient and can experience pain and pleasure. In light of this evidence, it is important that the Regulations recognise that animals are not merely objects to be used, hunted and kill, but living beings who deserve to be treated with respect and justice.

## **Governance and conflicts of interest**

The Impact Statement states it was "developed in consultation with hunting groups, firearm wholesalers and firearm retailers". These groups have a vested interest in continuing the legal status of hunting and so should be excluded from discussions determining the future of the Regulations. There is a clear conflict of interest here and these industries and groups should have no part in setting regulations about animal welfare.

The Regulations should plan to protect the rights of all animals by establishing independent agencies that uphold the rights of our fellow animals and ensure strong enforcement mechanisms against violations of their rights. These governance structures must be free of industries and groups that are the source of violence against the animals concerned.

## **Economy and employment**

The Impact Statement states that government policy is to grow the value of hunting in the Victorian economy. There is a clear conflict of interest here between growing the economic value of hunting and the welfare of the free-living animals harmed by it.

In addition, the Impact Statement gives estimates for the economic value and employment numbers for recreational hunting. These figures represent about 0.01% of the Victorian economy. This negligible contribution does not outweigh the costs to the individual animals affected by hunting.

## **Community expectations and education - animals**

On the matter of community expectations and education, currently the inherent cruelty of hunting is generally hidden from the Australian public. Even so, surveys show that 99% of Australians are opposed to animal cruelty. The remade Regulations should provide education resources to raise public awareness about the reality for the animals affected by hunting. When the public understands how much suffering is involved they will quickly extend their opposition to animal cruelty to cover all animals, including those who are hunted for pleasure. These education resources should also increase the public's awareness of concepts such as the rights of animals and the speciesism embedded in most aspects of Australian society.

## **Welfare 'improvements'**

The Regulations should focus on the abolition of the use of animals (including hunting) and not on ways to improve the welfare of animals in the current system. Doing this still accepts the fundamental premise that humans have the right to exploit animals for human benefit.

Thank you for considering the submission from Vegan Australia. We look forward to seeing these views represented in the final Regulations.

Greg McFarlane  
Managing Director  
Vegan Australia