

# The limitations of conservation hunting

Submission to the inquiry into the  
Game and Feral Animal Legislation  
Amendment (Conservation Hunting)  
Bill 2025

---

*The use of hunting as a conservation method, which the Bill proposes, has been generally unsuccessful and sometimes counterproductive. Invasive species policy requires a level of care and rigour that is not reflected in the proposed approach. Additionally, the Bill risks undermining Australian gun control through establishing a “right to hunt” in NSW.*

Submission

Skye Predavec

Alice Grundy

Bill Browne

July 2025

## **The Australia Institute - Research that matters**

Established in 1994, The Australia Institute is an independent public policy think tank based in Canberra that provides intellectual and policy leadership across a broad range of economic, social and environmental topics. We conduct research that drives the public debate and secures policy outcomes that make Australia better – research that matters.

The Australia Institute is funded by donations from philanthropic trusts and individuals, as well as grants and commissioned research from business, unions and non-government organisations. We do not accept donations or commissioned work from political parties. With no formal political or commercial ties, the Institute maintains its independence while advancing a vision for a fairer Australia.

Donations to our Research Fund are tax deductible, and can be made via our website or by calling the Institute:

Tel: (02) 6130 0530

Email: [mail@australiainstitute.org.au](mailto:mail@australiainstitute.org.au)

Website: [www.australiainstitute.org.au](http://www.australiainstitute.org.au)

PO Box 3839

Manuka

ACT 2603

## **Acknowledgement of Country**

The Australia Institute recognises the ancestral connections and custodianship of Traditional Owners throughout Australia. We pay respect to Aboriginal and Torres Strait Islander cultures and to Elders past and present.

# Contents

- Summary..... 1
  - Recommendations..... 2
- Introduction..... 3
- The Bill and the NFA ..... 5
  - The right to hunt..... 6
  - Prohibited weapons..... 6
  - Genuine reasons ..... 7
- Economic impacts of hunting ..... 8
- Hunting as a conservation tool..... 10
  - Evaluating “conservation hunting” ..... 11
  - A potential bounty scheme ..... 13
- The proposed Conservation Hunting Authority ..... 17
  - Functions and membership ..... 17
  - Ability to nominate ..... 18
- Conclusion ..... 20



# Summary

The Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill 2025 would be a step backwards for gun control, regional economies and invasive species management.

The “right to hunt” that it proposes would represent an erosion of the position all Australian governments have agreed to for 29 years: that the use of firearms is a privilege conditional on public safety.

The proposed expansion of hunting on public land brings little potential economic benefit, while threatening existing activities such as bushwalking and camping in those areas that do generate revenue for local businesses.

Invasive species management approaches like the one proposed have a largely unsuccessful history in Australia. Worse, such methods can result in *growth* of invasive species populations.

Commentary surrounding the Bill has flagged that changes to legislation could be accompanied by cuts to existing invasive species management programs, something that would affect conservation efforts in NSW.

The Conservation Hunting Authority that the Bill provides for would be controlled by the hunting lobby and act primarily in the interests of hunters. Its focus is not proper conservation efforts on public land. Groups such as the Australian Natives Association, an extremist white-nationalist organisation, would have the ability to nominate members.

NSW would benefit from a considered, coordinated strategy for invasive species management that incorporates several approaches. This Bill does not represent such a strategy.

# RECOMMENDATIONS

---

## Firearms control

- **Recommendation 1:** The proposed “right to hunt” should not be implemented.
- **Recommendation 2:** Conservation hunting should not be added as a genuine reason for the acquisition of a prohibited weapon.

## Conservation and economic impacts

- **Recommendation 3:** Due to the potential damage to local economies and conservation efforts from the expansion of hunting, it should not be expanded on NSW public land.
- **Recommendation 4:** The NSW Government should not proceed with plans to establish a bounty system for feral animals in NSW.
- **Recommendation 5:** The NSW Government should fund strategic, systemic and ongoing programs for invasive species management.

## The Conservation Hunting Authority

- **Recommendation 6:** The ability for extremist groups to become approved hunting organisations in NSW should be reviewed.
- **Recommendation 7:** The proposed Conservation Hunting Authority should not be established.
- **Recommendation 8:** If the authority is established, its membership, objects and functions should be amended to balance the needs of conservation with other elements of the proposed Conservation Hunting Authority.
  - **8a:** Representatives of hunting organisations should not constitute a majority of the voting members of the Authority.
  - **8b:** A majority of the Authority’s membership should have expertise in conservation and land management.

# Introduction

The Australia Institute welcomes the opportunity to make this submission to the Standing Committee on State Development's inquiry into the Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill 2025.

The Institute would welcome the opportunity to discuss research findings in further detail at any committee hearing, should there be one.

This Bill would introduce changes to legislation surrounding firearm ownership and use, conservation, hunting, and public land, as well as creating a "Conservation Hunting Authority" to provide advice on these issues.

Since the Port Arthur Massacre, successive federal, state and territory governments have been party to the National Firearms Agreement (NFA), which establishes an Australia-wide approach to gun control. Prime Minister Anthony Albanese credits the policies within the agreement – though still not fully enforced – with halving firearms deaths across the country.<sup>1</sup> When all states and territories, including NSW, reaffirmed the agreement in 2017, their opening statement's summary of its purpose was that "The Agreement affirms that firearms possession and use is a privilege that is conditional on the overriding need to ensure public safety".<sup>2</sup>

By contrast, a key feature of the Bill is the proposed "right to hunt" which it would enshrine in NSW law.<sup>3</sup> This right, though largely symbolic, represents a shift away from the underpinnings of firearms policy as defined in the NFA.<sup>4</sup>

Invasive species present a significant and growing threat to all of Australia, and NSW is no exception. There are several invasive vertebrates that cause damage to NSW's natural and built environments. For example, while it is difficult to determine the exact size of feral cat and pig populations, some recent estimates show there are 2.1–6.3 million feral cats<sup>5</sup> and

---

<sup>1</sup> Alannah & Madeline Foundation (2024) "Australian Parliament House displays letters that impelled national reform on gun control", <https://www.alannahandmadelaine.org.au/news/australian-parliament-house-displays-letters-that-impelled-national-reform-on-gun-control>

<sup>2</sup> Council of Australian Governments (2017) *National Firearms Agreement*, <https://www.ag.gov.au/crime/publications/2017-national-firearms-agreement>

<sup>3</sup> Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill 2025 (NSW), p4 [1-20], s4A

<sup>4</sup> Council of Australian Governments (1996, 2017) *National Firearms Agreement*, <https://www.acic.gov.au/sites/default/files/2022-03/1996%20National%20Firearms%20Agreement.pdf>; [https://www.resources.qld.gov.au/\\_\\_data/assets/pdf\\_file/0010/1399510/17-257.pdf](https://www.resources.qld.gov.au/__data/assets/pdf_file/0010/1399510/17-257.pdf)

<sup>5</sup> Legge, et al. (2017) "Enumerating a continental-scale threat: How many feral cats are in Australia", Abstract, <https://www.sciencedirect.com/science/article/pii/S0006320716309223>

2.4–4 million feral pigs<sup>6</sup> nationwide. Feral cats represent a significant threat to native flora and fauna, especially ground birds and small native mammals, which they kill in the hundreds of millions every year.<sup>7</sup> Feral pigs impact both agricultural production and the natural environment by degrading natural areas and killing a range of native animals.<sup>8</sup> Control of the population of these species is necessary for any approach to conservation of the natural environment in NSW to succeed.

Approaches to invasive species management that rely on sporadic, uncoordinated culling by hunting have a largely unsuccessful history in Australia. Programs that focus on the elimination of individual animals, rather than on mitigating their impacts, are generally ineffective outside of limited circumstances (such as islands), which do not apply to this Bill.<sup>9</sup> Without coordination and management of hunting for conservation, the Bill also risks unintended consequences through disruptions to the existing ecosystem, including increases in the number of invasive species after hunting has taken place in an area.<sup>10</sup>

NSW would benefit from a considered, coordinated strategy for invasive species management that incorporates several approaches. This Bill places disproportionate emphasis on hunting and would put the interests of hunters above the conservation needs of NSW's public lands.

---

<sup>6</sup> Hone (2019) *How many feral pigs in Australia? An update*, <https://researchprofiles.canberra.edu.au/en/publications/how-many-feral-pigs-in-australia-an-update>

<sup>7</sup> Invasive Species Council (n.d.) "Feral cats in Australia", <https://invasives.org.au/our-work/feral-animals/cats-in-australia/feral-cats/>

<sup>8</sup> Department of Primary Industries (n.d.) "Feral pigs", <https://www.dpi.nsw.gov.au/biosecurity/vertebrate-pests/pest-animals-in-nsw/feral-pigs/feral-pig-biology>

<sup>9</sup> Bureau of Resource Sciences (1998) "Economic Evaluation of the role of bounties in Vertebrate Pest Management", p44, <https://pestsmart.org.au/wp-content/uploads/sites/3/2020/06/Economic-evaluation-of-the-role-of-bounties.pdf>

<sup>10</sup> Johnson (2015) "Culling pest animals can do more harm than good", <https://theconversation.com/culling-pest-animals-can-do-more-harm-than-good-40702>



# The Bill and the NFA

After the tragic Port Arthur Massacre in 1996, where 35 people were killed and 23 wounded by a single perpetrator, the Commonwealth and all eight state and territory governments came to a consensus on the National Firearms Agreement (NFA), which set nationwide standards for gun control laws.<sup>11</sup> When that agreement was reaffirmed by all parties – including NSW – in 2017, it opened with this summary of the NFA’s effects: “that firearms possession and use is a privilege that is conditional on the overriding need to ensure public safety”, not a right.<sup>12</sup> This is more than a semantic difference, it is the fundamental underpinning of the Australia-wide control on firearms.

This Bill, through the introduction of an individual’s “right to hunt”, risks undermining the NFA.

There are more guns in Australia than ever before. With over four million licenced firearms, there is one gun for every seven Australians.<sup>13</sup> There is still no national firearms register, and the National Firearms Agreement is not being fully enforced even though 29 years have elapsed since it was agreed by all Australian governments.<sup>14</sup>

Australian firearm legislation is a point of pride, something that separates Australia from the United States and their high rate of firearm violence. Key to that separation is that the United States has an enshrined right to “bear arms” [possess and use firearms], and Australia does not.<sup>15</sup> In 1992, the Australian gun lobby claimed, like its American counterparts, that a right to bear arms existed in Australia.<sup>16</sup> The NFA repudiates that stance, and states that “firearm possession and use is a privilege”, a principle that is key to ensuring firearms are only accessed by those who need them. The NFA requires that all firearms be registered and held by a licenced owner, who must prove a “genuine reason” for having a gun or other prohibited weapon, such as a flamethrower or silencer.<sup>17</sup> Notably, the NFA sets out the “genuine reasons” that count for the purposes of a firearms licence in

---

<sup>11</sup> Council of Australian Governments (1996) *National Firearms Agreement*, <https://www.acic.gov.au/sites/default/files/2022-03/1996%20National%20Firearms%20Agreement.pdf>

<sup>12</sup> Council of Australian Governments (2017) *National Firearms Agreement*, [https://www.resources.qld.gov.au/\\_\\_data/assets/pdf\\_file/0010/1399510/17-257.pdf](https://www.resources.qld.gov.au/__data/assets/pdf_file/0010/1399510/17-257.pdf)

<sup>13</sup> Gottschalk, Clarke, Chollet and Grundy (2025) *Gun Control in Australia*, <https://australiainstitute.org.au/report/gun-control-in-australia/>

<sup>14</sup> Predavec, Grundy & Campbell (2025) *Australian gun control: 29 years after Port Arthur*, pp1-2

<sup>15</sup> Peters (2022) “Gun ownership is not a right”, <https://www.humanrights.unsw.edu.au/research/commentary/gun-ownership-not-right>

<sup>16</sup> Peters (2022) “Gun ownership is not a right”

<sup>17</sup> Council of Australian Governments (1996, 2017) *National Firearms Agreement*

Australia, and states that “personal protection” is not one of them.<sup>18</sup> If firearm ownership were a right, as is the case in the United States, these restrictions may not be possible.

## The right to hunt

While this Bill does not seek to enact an American style right to bear arms, the “right to hunt” that it proposes would erode the position all Australian governments have agreed to for 29 years.<sup>19</sup> Instead of formulating hunting as a conditional privilege, the Bill states that an individual “must not act in a way that poses a risk to public safety” in exercising their “right to hunt”.<sup>20</sup> The consequence of violating the conditions of a privilege is clear: the privilege is extinguished. However, the consequences for not complying with what an individual “must do” for their “right” to hunt are not set out in this Bill. The Bill includes clauses that would likely prevent its “right to hunt” provisions from impacting administrative decisions, rendering the proposed right largely symbolic.<sup>21</sup> However, even a symbolic move away from the National Firearms Agreement has implications for gun control in Australia.

## Prohibited weapons

The Bill would also amend the *Prohibited Weapons Act 1998*, purportedly to make conservation hunting a genuine reason for the purposes of acquiring a firearm silencer.<sup>22</sup> This is potentially damaging on its own: Silencers make gunshots harder to hear the sound of gunfire or see the flash of the bullet when it comes out of the muzzle, making it more difficult for other people, and police, to identify shooting activity.<sup>23</sup>

In addition, the amendment does not specify that the reason only applies to the acquisition of silencers, and conservation hunting could therefore be used as a reason to acquire other weapons in the same class such as flamethrowers, rocket launchers, spear guns, and other prohibited weapons.<sup>24</sup>

Making prohibited weapons such as silencers easier to access would be a step backward for gun control in NSW.

---

<sup>18</sup> Council of Australian Governments (1996, 2017) *National Firearms Agreement*

<sup>19</sup> Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill 2025 (NSW), p4 [3-20] Sch. 1

<sup>20</sup> Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill 2025 (NSW), p4 [21-32] Sch. 1

<sup>21</sup> Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill 2025 (NSW), p4 [33-37] Sch. 1

<sup>22</sup> Borsak (2025) “Second Reading Debate”,

<https://www.parliament.nsw.gov.au/Hansard/Pages/HansardResult.aspx#/docid/HANSARD-1820781676-99657>

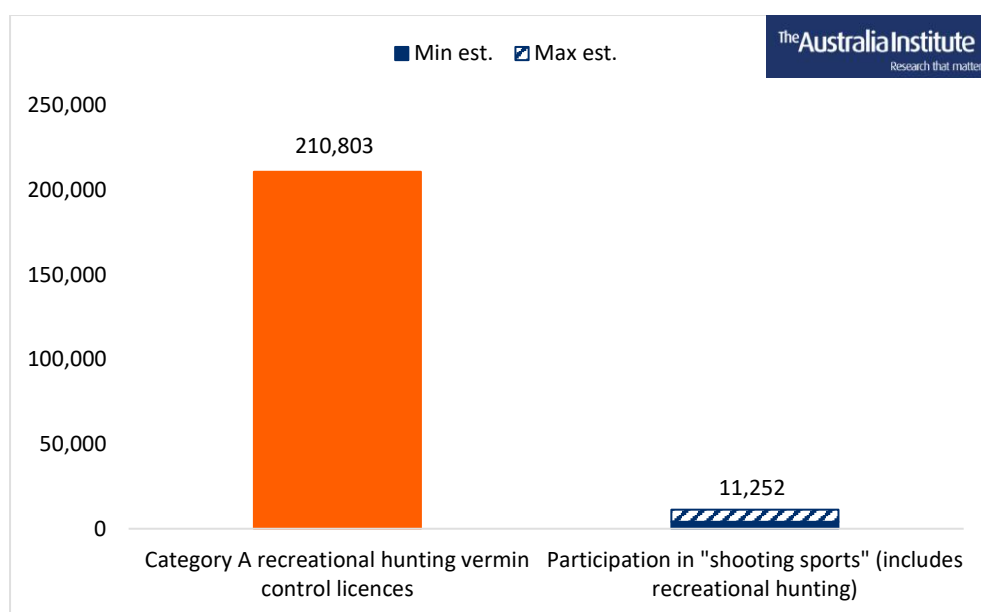
<sup>23</sup> Giffords Law Centre (n.d.) “Silencers”, <https://giffords.org/lawcenter/gun-laws/policy-areas/hardware-ammunition/silencers>

<sup>24</sup> Weapons Prohibition Act 1998 No 127 (NSW), Schedule 1; Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill 2025 (NSW), p 14 [18-23] Schedule 4

## Genuine reasons

Existing genuine reason requirements for firearms that are not in the *Prohibited Weapons Act* require little proof, meaning they do not adequately ensure that the person applying for a firearms licence requires one. Since genuine reason requirements have been introduced, membership in shooting organisations has surged, but actual participation remains low.<sup>25</sup> There are over 200,000 Category A hunting licences in NSW, but only 11,000 people participate in recreational hunting each year. In other words, there is already a significant number of people who do not use their firearms for the stated purpose on their licence. An increase in the number of genuine reasons would likely widen this.

**Figure 1: Hunting licences vs participation in NSW (2024, min/max)**



Source: NSW Police Force (2024) Firearms Licensing and Ownership Statistics Dec 24, 1.2, [https://www.police.nsw.gov.au/about\\_us/information\\_of\\_interest\\_to\\_the\\_community/firearms\\_data](https://www.police.nsw.gov.au/about_us/information_of_interest_to_the_community/firearms_data) ; AusPlay (2024) NSW data tables – January to December 2024, Participation by activity (adults) <https://www.ausport.gov.au/clearinghouse/research/ausplay/results>

**Recommendation 1:** The proposed “right to hunt” should not be implemented.

**Recommendation 2:** Conservation hunting should not be added as a genuine reason for the acquisition of a prohibited weapon.

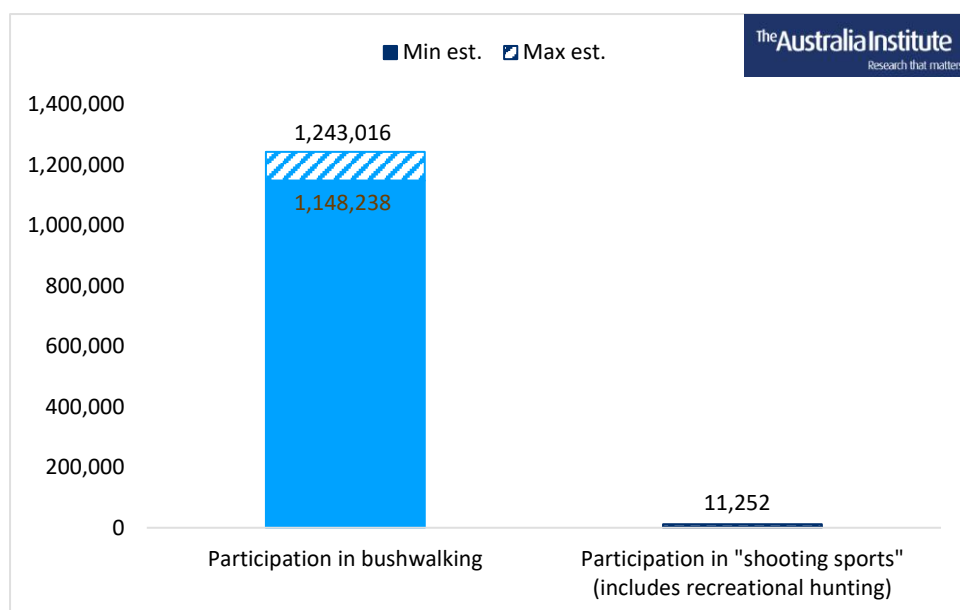
<sup>25</sup> Alpers & Ghazarian (2019) *Successful Public Policy*, “The ‘perfect storm’ of gun control: From policy inertia to world leader”, <https://press-files.anu.edu.au/downloads/press/n5314/html/ch09.xhtml?page=16>

# Economic impacts of hunting

One of the motivations for the Bill stated in the second reading speech was that it would yield economic benefits.<sup>26</sup> The expansion of hunting risks reducing economic activity in regional areas by discouraging other forms of tourism. It is not clear why hunting warrants special consideration as a “right” to the use of NSW public land, while other activities such as bushwalking or camping, which have significantly larger economic benefits for regional NSW, are not afforded the same recognition.

*AusPlay* is a large-scale national population tracking survey that informs government investment, policy and programs.<sup>27</sup> According to the *AusPlay* survey, just over 11,000 people in NSW participated in “shooting sports” in 2024, a category that includes but is not limited to hunting. For the same period, 1.2 million people went bushwalking. *AusPlay*’s figures were used by the NSW Department of Primary Industries to estimate the economic impact of hunting in NSW, the results of which were cited by MLC Robert Borsak as being a key reason to support this Bill.<sup>28</sup>

**Figure 2: Number of participants in bushwalking and recreational hunting in NSW (2024)**



<sup>26</sup> Borsak (2025) “Second Reading Debate”,  
[https://www.parliament.nsw.gov.au/Hansard/Pages/HansardResult.aspx#/docid/"HANSARD-1820781676-99657](https://www.parliament.nsw.gov.au/Hansard/Pages/HansardResult.aspx#/docid/)

<sup>27</sup> Clearinghouse for Sport (n.d.) *AusPlay*, <https://www.ausport.gov.au/clearinghouse/research/ausplay>

<sup>28</sup> Borsak (2025) “Second Reading Debate”,  
[https://www.parliament.nsw.gov.au/Hansard/Pages/HansardResult.aspx#/docid/"HANSARD-1820781676-99657](https://www.parliament.nsw.gov.au/Hansard/Pages/HansardResult.aspx#/docid/)

The NSW Department of Primary Industries estimates that hunting contributes \$508.9 million in gross state product (GSP) to NSW, only 11% of which (\$56.3 million) is from hunting on public land.<sup>29</sup> In contrast, Tourism Australia data shows that the two million visitors to public campgrounds in NSW spent \$2 billion in 2024.<sup>30</sup> Australia Institute research has shown that the presence of hunting generally discourages other activities in regional areas, including bushwalking.<sup>31</sup> Our research in 2012 found that a majority of Victorians would probably or definitely avoid holidaying in areas where duck hunting was taking place in 2012.<sup>32</sup> A similar survey in 2023 found that 71% of South Australians agreed that the presence of duck and quail shooters would deter them from visiting an area.<sup>33</sup>

Additionally, the potential for growth in tourism is much higher with bushwalking than it is with hunting. More than 90% of people are interested in walking in national parks according to the NSW Department of Climate Change, Energy, the Environment and Water.<sup>34</sup> Australia Institute polling of South Australia in 2023 found that only 8% of respondents who had not participated in duck or quail hunting would ever consider doing so, and that most of those who had participated were not planning on doing so again.<sup>35</sup>

The millions of bushwalkers in NSW are a much larger share of tourism in regional areas than NSW's 11,000 recreational hunters. If even a small share of bushwalkers – let alone a majority as polling suggests – were to be turned off from a regional area due to the expansion of hunting, it could have significant negative impacts on the local economy. There is no evidence to suggest that these negative impacts would be outweighed by the comparatively small economic benefits of hunting.

**Recommendation 3:** Due to the potential damage to local economies and conservation efforts from the expansion of hunting, it should not be expanded on NSW public land.

---

<sup>29</sup> Department of Primary Industries (2023) *Economic contribution of recreational hunting in NSW*, p30, [https://www.dpi.nsw.gov.au/\\_\\_data/assets/pdf\\_file/0020/1490033/economic-contribution-2021-22.pdf](https://www.dpi.nsw.gov.au/__data/assets/pdf_file/0020/1490033/economic-contribution-2021-22.pdf)

<sup>30</sup> Tourism Australia (2025) "Caravan and camping data" (non commercial), <https://www.tra.gov.au/en/domestic/caravan-and-camping-data>

<sup>31</sup> Campbell, Denniss & Baker (2012) *Out for a Duck: An analysis of the economics of duck hunting in Victoria*, <https://australiainstitute.org.au/report/out-for-a-duck/>

<sup>32</sup> Campbell, Denniss & Baker (2012) *Out for a Duck: An analysis of the economics of duck hunting in Victoria*, p7

<sup>33</sup> Morison, Campbell & Schultz-Byard (2023) *Crying Fowl: Submission to the South Australian Select Committee on Hunting Native Birds*, p4, <https://australiainstitute.org.au/post/sa-duck-hunting-ban-backed-by-majority-of-voters-would-have-minimal-economic-impact/>

<sup>34</sup> Department of Climate Change, Energy, the Environment and Water (2025) *NSW Great Walks*, p4, <https://www.environment.nsw.gov.au/publications/nsw-great-walks-factsheet>

<sup>35</sup> Morison, Campbell & Schultz-Byard (2023) *Crying Fowl: Submission to the South Australian Select Committee on Hunting Native Birds*, p3

# Hunting as a conservation tool

The stated purpose of the Bill, indeed part of its name, is hunting as conservation practice. Two reviews of invasive species management practices in Australia have found that approaches in line with those proposed by the Bill have a largely unsuccessful history in Australia. Nationals MLC Scott Barrett noted that previous approaches to invasive species management have led to “terrible mistakes” that could have been avoided with more “consideration, care and rigour” when he referred this Bill to an inquiry.<sup>36</sup> Incorporating hunting into attempts to exterminate or control invasive species in Australia could represent such a mistake.

The Bill seeks to legislate hunting as a key plank of conservation efforts on public land in NSW. It would open up at least 23 crown land areas of greater than 400 hectares to recreational shooting.<sup>37</sup> It would allow subordinate legislation to expand the areas where “conservation hunting” is allowed on public land – avoiding the need for parliamentary scrutiny. This lack of scrutiny prompted the Legislative Review Committee, which reviews proposed Bills on their impact on personal rights and liberties, to recommend that NSW Parliament should consider the matter.<sup>38</sup>

The Bill seeks to amend the *Forestry Act* to ensure a land manager’s objective to conserve fauna living in a forestry area includes “promoting the use of the forestry area for hunting”.<sup>39</sup> Similarly, it proposes to amend the *Crown Land Management Act* to ensure land managers “must consider the use of the designated land for hunting ... as a way to encourage the conservation of the natural environment and native species”. As a justification for this, the Bill proposes to amend the objects of the act, inserting “to recognise hunting on public and private land as a way to encourage the conservation of the natural environment and native species”<sup>40</sup> before the existing object of “effective management of introduced species of game animals”.<sup>41</sup> Regardless of how the Bill may

---

<sup>36</sup> Barrett (2025) “Second Reading Debate”, <https://www.parliament.nsw.gov.au/Hansard/Pages/HansardFull.aspx#/DateDisplay/HANSARD-1820781676-100054/HANSARD-1820781676-100138>

<sup>37</sup> Invasive Species Council (2025) “NSW government urged to reject Shooters Party deal over ‘dangerous and misleading’ hunting bill”, <https://invasives.org.au/media-releases/nsw-government-urged-to-reject-shooters-party-deal-over-dangerous-and-misleading-hunting-bill/>

<sup>38</sup> Legislative Review Committee (2025) *Legislative Review Digest*, pp31–32, <https://www.parliament.nsw.gov.au/bills/Pages/bill-details.aspx?pk=18752>

<sup>39</sup> Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill 2025 (NSW), p14 [1-17] Sch. 4

<sup>40</sup> Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill 2025 (NSW), p3 [1-10] Sch. 1 [1]

<sup>41</sup> Game and Feral Animal Control Act 2002 No 64 (NSW), 3

define the proposed hunting-as-conservation strategy, available evidence suggests such an approach has rarely, if ever, been successful on a large scale in Australia.

In his second reading speech for the Bill, MLC Robert Borsak stated that by expanding access to public land for hunting, NSW can “improve environmental outcomes” and “reduce government expenditure”.<sup>42</sup> The latter point implies not only that hunting would be a successful means of conservation, but that hunting could replace existing government programs for the management of invasive species. Invasive species management in NSW is already hampered by “often insecure, short-term funding” according to the Natural Resources Commission’s *Invasive Species Management Review*.<sup>43</sup> Reducing the funding of existing programs would likely exacerbate the issue. However, even without the cancellation of existing management programs, this Bill is unlikely to improve NSW’s ability to reduce feral animal populations.

As part of the Bill’s proposal to introduce amateur hunting into conservation policy, the NSW Government has discussed a bounty scheme,<sup>44</sup> something which MLC Robert Borsak gave prominence in his second reading speech.<sup>45</sup> However, the Bill does not create a bounty program. The potential impact of the Bill, both with and without a hypothetical bounty scheme, is the subject of the following sections of this submission.

## Evaluating “conservation hunting”

Regardless of the addition of a bounty program, the Bill would not be effective for conservation. The sporadic, uncoordinated culling which this Bill would provide for with a “conservation hunting strategy” does not align with best practice for pest management and could have negative unintended consequences.

Before 1990, the main focus of pest management in Australia was the reduction of the number of pests, and if possible, their eradication.<sup>46</sup> The Bureau of Rural Sciences (BRS) conducted a critical review of past programs in 1991, finding that “despite concerted effort over many decades supported by strong legislation requiring land managers to continually

---

<sup>42</sup> Borsak (2025) “Second Reading Debate”

<sup>43</sup> Natural Resources Commission (2024) *NSW Invasive Species Management Review*, p96, <https://www.dpi.nsw.gov.au/dpi/bfs/independent-biosecurity-commissioner>

<sup>44</sup> Vidler (2025) “‘Waste of money’: Farmers, environmentalists clash over feral animal bounty”, <https://www.9news.com.au/national/bounty-on-pest-animals-nsw-premier-chris-minns-reaction/af8e0250-96fd-4ba4-b31e-0ad16f865b81>

<sup>45</sup> Borsak (2025) “Second Reading Debate”

<sup>46</sup> Braysher et al (2012) “Principles Underpinning Best Practice Management of the Damage due to Pests in Australia”, p300, [https://www.researchgate.net/publication/237138274\\_Managing\\_vertibrate\\_pests\\_principles\\_and\\_strategies](https://www.researchgate.net/publication/237138274_Managing_vertibrate_pests_principles_and_strategies)



suppress and destroy pests, all ... well-established pests in 1900 were still pests in 1990”.<sup>47</sup> The review found that eradication is only achievable under specific conditions where a program can target all reproductive individuals faster than they can reproduce, and migration to the area is not possible.<sup>48</sup> Because of this, the report concluded that in Australia, eradication is only likely to be practical “on small islands off the mainland or in special local areas”. In light of the difficulty of eradication, the review set out national guidelines, recommending a strategic approach to managing the impact of pest animals, and that “management needs to focus on reducing damage and not just pest numbers”.<sup>49</sup> The strategic approach has since been endorsed by national, state and territory pest management strategies.<sup>50</sup> The BRS review’s recommendations continue to influence invasive species management in Australia, and were reaffirmed as best practice by the NSW Natural Resources Commission’s State-wide review of pest animal management in 2016.<sup>51</sup>

The Bill would allow recreational hunting as a conservation tool, but without a clear objective in terms of mitigating the impacts of invasive species. Instead, as stated by MLC Robert Borsak in his second reading speech, the Bill is intended to provide “sustained pressure on pest populations”.<sup>52</sup> This focuses on reducing pest populations, rather than the best-practice approach of mitigating pest animals’ impacts.

Sporadic and uncoordinated culling programs can have negative unintended consequences for controlling invasive species populations. As the BRS review notes: “recreational hunting is usually not concentrated in any particular area and, given the independence of hunters, their actions are difficult to coordinate and focus”.<sup>53</sup>

Only a certain share of any animal population will survive into adulthood under ordinary circumstances due to predation and lack of food or habitat.<sup>54</sup> A culling program that does not kill a large enough share of the target population will free up resources for other animals, changing which creatures are killed rather reducing the size of populations.<sup>55</sup> The

---

<sup>47</sup> Braysher et al (2012) “Principles Underpinning Best Practice Management of the Damage due to Pests in Australia”, p300

<sup>48</sup> Braysher et al (2012) “Principles Underpinning Best Practice Management of the Damage due to Pests in Australia”, p302

<sup>49</sup> Braysher (1993) *Managing Vertebrate Pests: Principles and Strategies*, p5, <https://pestsmart.org.au/resources/?title=managing-vertebrate-pests-principles-and-strategies>

<sup>50</sup> Braysher et al (2012) “Principles Underpinning Best Practice Management of the Damage due to Pests in Australia”, p301

<sup>51</sup> Natural Resources Commission (2016) *State-wide review of pest animal management*, pp21–22

<sup>52</sup> Borsak (2025) “Second Reading Debate”

<sup>53</sup> Braysher (1993) *Managing Vertebrate Pests: Principles and Strategies*, p33

<sup>54</sup> Invasive Species Council (2012) “Recreational hunting NSW: claims v facts”, [https://invasives.org.au/wp-content/uploads/2014/02/fs\\_rehunt\\_NSWvfacts.pdf](https://invasives.org.au/wp-content/uploads/2014/02/fs_rehunt_NSWvfacts.pdf)

<sup>55</sup> Bureau of Resource Sciences (1998) “Economic Evaluation of the role of bounties in Vertebrate Pest Management”, p8, <https://pestsmart.org.au/wp-content/uploads/sites/3/2020/06/Economic-evaluation-of-the-role-of-bounties.pdf>



widespread, uncoordinated, culling by amateur hunters that this Bill would provide for would be unlikely to reliably achieve the level of culling required to avoid these potential unintended consequences.

A 2013 attempt to cull the feral cat population in Tasmania, for example, had the opposite effect, increasing the abundance and activity of feral cats in the cull-sites.<sup>56</sup> A study into the culling program found that most of the removed cats were dominant adults, and their exit allowed young cats from surrounding areas – not all of which would have ordinarily survived to adulthood – to fill the gap.<sup>57</sup> The study found that that, if culling is to be effective, “it should be part of a multi-faceted approach and may need to be strategic, systemic and ongoing”.<sup>58</sup> This situation is not unique to Tasmania. A 2011 study found the same phenomenon occurred with a ferret removal program on Rathlin Island in the UK, highlighting how “partial or localised management may prove ineffective, and at worst might exacerbate the problems that management was designed to avert”.<sup>59</sup>

Available evidence on the use of hunting as a conservation strategy points to it being ineffective and potentially counterproductive. The Bill would allow for sporadic, uncoordinated culling with the potential for unintended consequences.

## A potential bounty scheme

From the perspective of the Bill’s authors,<sup>60</sup> a bounty scheme would represent a best-case scenario for the hunting-as-conservation approach that is proposed with the Bill, as it could encourage greater participation in “conservation hunting” activities.

A 1998 study by the BRS reviewed the record of bounty schemes in Australia and found that “the use of bounty payments as a pest control mechanism has been largely unsuccessful in addressing the damage caused by vertebrate pests”.<sup>61</sup> It further found that traditional bounty schemes are “unsuitable for the control of animals that are present in large numbers, are widely distributed or have high reproductive rates”.<sup>62</sup> The study stated that

---

<sup>56</sup> Lazenby, Mooney & Dickman (2014) “Effects of low-level culling of feral cats in open populations: a case study from the forests of southern Tasmania”, <https://www.publish.csiro.au/wr/WR14030>

<sup>57</sup> Lazenby, Mooney & Dickman (2014) “Effects of low-level culling of feral cats in open populations: a case study from the forests of southern Tasmania”

<sup>58</sup> Lazenby, Mooney & Dickman (2014) “Effects of low-level culling of feral cats in open populations: a case study from the forests of southern Tasmania”

<sup>59</sup> Bodey, Bearhop & McDonald (2011) “Localised control of an introduced predator: creating problems for the future?”, Abstract, <https://link.springer.com/article/10.1007/s10530-011-9965-2>

<sup>60</sup> Borsak (2025) “Second Reading Speech”

<sup>61</sup> Bureau of Resource Sciences (1998) “Economic Evaluation of the role of bounties in Vertebrate Pest Management”, p44, <https://pestsmart.org.au/wp-content/uploads/sites/3/2020/06/Economic-evaluation-of-the-role-of-bounties.pdf>

<sup>62</sup> Bureau of Resource Sciences (1998) “Economic Evaluation of the role of bounties in Vertebrate Pest Management”, p44

“Despite [failings] and with little evidence of the past success or potential of such schemes, pressure to introduce bounty schemes to address certain pest animal problems still occurs”, and that “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”.

This sentiment is echoed by many individuals involved in invasive species control, including current NSW Agriculture Minister Tara Moriarty.<sup>63</sup> In response to proposals of a bounty system for foxes, a spokesperson for Moriarty told the *Daily Telegraph* in 2024 that bounties “encourage the use of control techniques such as ground shooting and trapping” that, for most pest animals, “are relatively ineffective techniques”.<sup>64</sup>

Such a system already operates in Victoria but has not achieved measurable success in managing foxes. While there are no regular estimates of the size of Victoria’s fox population, or the effect the bounty scheme has had on that population, there are up to 16 foxes per square kilometre in Melbourne and 4–8 per square kilometre in regional areas according to the Victorian Department of Agriculture.<sup>65</sup> Applying these population densities to Victoria as a whole equates to an estimated 1–1.9 million foxes in the state. In 2024, 92,308 fox bounties were collected,<sup>66</sup> representing 5–9% of Victoria’s fox population, well short of the approximately 65% of foxes that would have to be killed every year to halt population growth.<sup>67</sup>

Even if all foxes claimed in the program would not have been killed otherwise, the program has never left a significant dent in the fox population. As shown in Figure 3, despite 2024 having the highest number of bounties claimed since 2018 it was still far from the 65% required to halt population growth.<sup>68</sup> In fact, a Victorian Institute of Animal Science evaluation of a previous iteration of the program found that it had “little effect on fox populations in Victoria and may result in an increase in reproduction rates during the next

---

<sup>63</sup> McGowan & Maddison (2025) “Premier opens the door on feral pig bounties. Now the Shooters’ Party wants a ‘right to hunt’”, <https://www.smh.com.au/politics/nsw/premier-opens-the-door-on-feral-pig-bounties-now-the-shooters-party-wants-a-right-to-hunt-20250529-p5m37u.html>

<sup>64</sup> Birdjan (2024) “Dubbo landholders, producers push for NSW Government to introduce fox bounty”, <https://www.dailytelegraph.com.au/newslocal/dubbo/dubbo-landholders-producers-push-for-nsw-government-to-introduce-fox-bounty/news-story/7b816e87a2ec83500f998ac3c2a56760>

<sup>65</sup> Agriculture Victoria (n.d.) “Red fox”, <https://agriculture.vic.gov.au/biosecurity/pest-animals/established-pest-animal-species/red-fox>

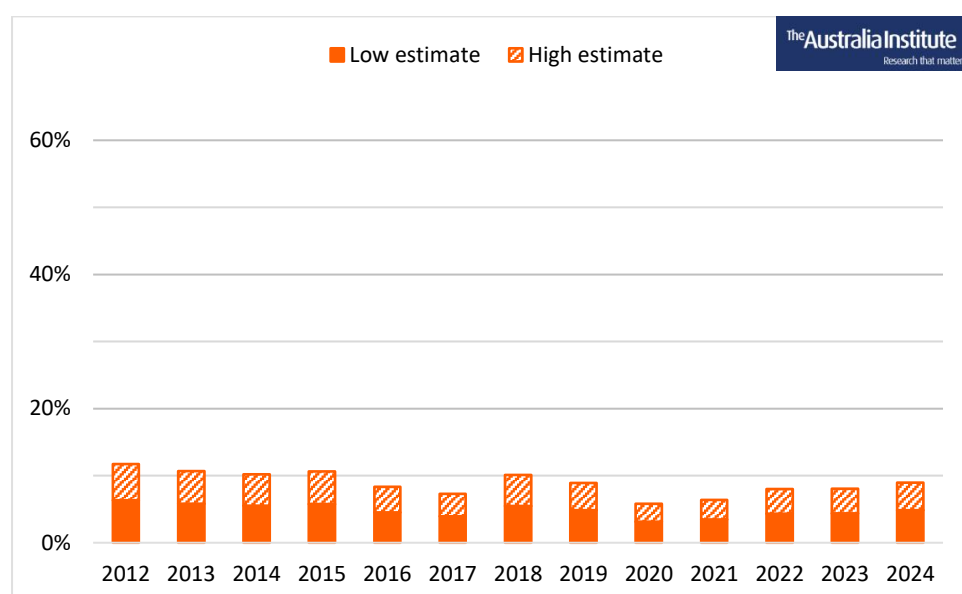
<sup>66</sup> Williams (2025) “Bounty hunters return to target invasive species”, <https://cosmosmagazine.com/nature/the-bounty-hunters-return/>

<sup>67</sup> Invasive Species Council (2012) “Recreational hunting NSW: claims v facts”, [https://invasives.org.au/wp-content/uploads/2014/02/fs\\_rehunt\\_NSWvfacts.pdf](https://invasives.org.au/wp-content/uploads/2014/02/fs_rehunt_NSWvfacts.pdf)

<sup>68</sup> Rogers (2024) “Farmers and conservationists locked in a ‘never-ending and unwinnable’ battle against foxes”, <https://www.abc.net.au/news/2024-04-04/farmers-conservationists-fox-eradication-never-ending-battle/103553400>

breeding season in some areas.”<sup>69</sup> Despite its lack of success, the Victorian scheme continues to cost the state millions of dollars in bounty payments at time of writing.<sup>70</sup>

**Figure 3: Estimated share of Victorian fox population claimed as bounties each year**



Source: Rogers (2024) *Farmers and conservationists locked in a “never-ending and unwinnable” battle against foxes*; Williams (2025) *Bounty hunters return to target invasive species*

Foxes are far from unique in terms of invasive species management challenges. In order to halt population growth, 57% of feral cats and 70% of feral pigs would have to be killed annually.<sup>71</sup> The most recent population estimates show there are between 2.1–6.3 million feral cats<sup>72</sup> and between 2.4–4 million feral pigs<sup>73</sup> nationwide. While a successful bounty program in NSW would not have to kill all of those animals, it would have to consistently eliminate large numbers of animals to contribute to their management. Additionally, if the numbers killed were too low, such a program would run the risk of counterproductively assisting the growth in population numbers in some areas. That would involve the less than 11,000 recreational hunters in NSW shooting hundreds of thousands of animals per year,

<sup>69</sup> Victorian Institute of Animal Science Vertebrate Pest Research Department (2003) *Evaluation of the 2002/03 Victorian fox bounty trial*, p26, <https://vgls.sdp.sirsidynix.net.au/client/search/asset/1009931>

<sup>70</sup> Dahlstrom (2021) “‘Waste of public funds’: Call to end Victoria’s fox scalping scheme”, <https://au.news.yahoo.com/waste-of-public-funds-call-to-end-victorias-fox-scalping-scheme-020526054.html>

<sup>71</sup> Invasive Species Council (2012) “Recreational hunting NSW: claims v facts”

<sup>72</sup> Legge, et al. (2017) “Enumerating a continental-scale threat: How many feral cats are in Australia”, Abstract, <https://www.sciencedirect.com/science/article/pii/S0006320716309223>

<sup>73</sup> Hone (2019) “How many feral pigs in Australia? An update”, <https://researchprofiles.canberra.edu.au/en/publications/how-many-feral-pigs-in-australia-an-update>

every year.<sup>74</sup> Even if a bounty scheme were introduced alongside – rather than instead of – existing measures, for the program to be successful it would need high participation.

The use of amateur hunting as part of conservation efforts is not a novel idea in Australia, and the lesson of past attempts is that bounties are a generally ineffective and sometimes hazardous, policy setting. NSW faces significant conservation threats from invasive species, which require a considered and scientifically backed approach. This Bill does not appear to represent such an approach.

**Recommendation 4:** The NSW Government should not proceed with plans to establish a bounty system for feral animals in NSW.

**Recommendation 5:** The NSW Government should fund strategic, systemic and ongoing programs for invasive species management.

---

<sup>74</sup> AusPlay (2024) *NSW data tables – January to December 2024*, Participation by activity (adults)

# The proposed Conservation Hunting Authority

One key aspect of the Bill is a “Conservation Hunting Authority” to replace the now-abolished Game Council. The proposed Authority risks creating some of the same issues highlighted in a “scathing” review of Game Council’s governance, which led to the Council’s abolition.<sup>75</sup>

## Functions and membership

The proposed Conservation Hunting Authority largely mirrors the objects and functions of the Game Council and could replicate its shortcomings along with them.

The Game Council was abolished following an independent review that found serious governance failures and that public safety “[did] not receive a high level of attention”.<sup>76</sup> A key issue identified in the review was an inability to resolve the “inherent conflict of interests” between its dual purposes of “representing the interests of hunters” and regulating their activities through “administering a licencing system for hunters”.<sup>77</sup>

Like the Council, the Conservation Hunting Authority’s first object would be “to represent the interests of licenced game hunters in matters arising under this Act”.<sup>78</sup> Unlike the Council it would not administer a licensing system, but it would still fulfill an advisory role in regulating hunting activities, including the function “to make recommendations [on the land to be made available for hunting] to the responsible minister”.<sup>79</sup> Simultaneously, it would have the purpose of representing the interests of hunters, and giving advice on the expansion of the land available to them for hunting for the purposes of conservation.

This is in line with other proposed functions of the Authority, including “to promote research into the benefits of hunting for the development of regional economies and the conservation of the natural environment and native animals”.<sup>80</sup> This mirrors a key function of the Game Council, “providing education services, and undertaking research”.<sup>81</sup> As

---

<sup>75</sup> Nicholls (2013) “Game Council to be abolished”, <https://www.smh.com.au/national/nsw/game-council-to-be-abolished-20130704-2pdte.html>

<sup>76</sup> Nicholls (2013) “Game Council to be abolished”

<sup>77</sup> Dunn (2013) *Governance Review of the Game Council of NSW*, pp3, 19, <https://invasives.org.au/wp-content/uploads/2014/07/Game-Council-Governance-Review-S-Dunn-14-June-2013.pdf>

<sup>78</sup> Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill 2025 (NSW) p5 [33-41] 9 (1)(a, b)

<sup>79</sup> Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill 2025 (NSW) p5 [33-41] 9 (1)(a, b)

<sup>80</sup> Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill 2025 (NSW) p6 [3-9] 9 (1)(f)

<sup>81</sup> Dunn (2013) *Governance Review of the Game Council of NSW*, p19

discussed in this submission, previous Australia Institute research shows that hunting has been neutral or harmful for the development of regional economies and scientific research generally shows that recreational hunting is ineffective or harmful for conservation efforts.<sup>82</sup> The proposed Authority does not include promotion of such research in its functions, only that which aligns with the view that hunting is beneficial.

A majority of the Authority's seven-person voting membership would be nominees of hunting organisations.<sup>83</sup> The other three members would be a qualified wildlife management scientist, a person nominated by the Minister for Aboriginal Affairs and Treaty, and a person who is not a public servant or member of a hunting organisation. The presence of only a single expert on wildlife management would not adequately equip the Authority to provide accurate advice on game and feral animal management, as it is required to do.<sup>84</sup> The Authority represents an even greater skew towards hunting organisations than the Game Council, on which a minority of members were nominated by hunting organisations (8 of 18).<sup>85</sup>

In mirroring the abolished Game Council in its objects, functions, and membership, the Conservation Hunting Authority would risk suffering the same issues that led to the Council's abolition.

## Ability to nominate

A further issue lies with the ability of "prescribed hunting organisations" to nominate members.<sup>86</sup> At present, this would likely mean that any approved hunting organisation in NSW would be able to nominate members. However, the requirements for becoming such an organisation do not currently prevent approval for extremist groups.

For example, one approved hunting organisation in NSW is the Australian Natives Association (ANA), which is listed as an extremist organisation by the Global Project Against Hate and Extremism for its "Anti-Immigrant, White Nationalist, [and] Anti-Woman" ideology.<sup>87</sup> When asked in 2023 about the group's approved hunting status by the *Sydney Morning Herald*, NSW Department of Primary Industries declined to comment, stating that approved hunting organisations must "prove their adherence to the NSW Game Hunting Licence Code of Practice".<sup>88</sup> This Code of Practice only includes clauses on the safe handling

---

<sup>82</sup> Campbell, Denniss & Baker (2012) *Out for a Duck: An analysis of the economics of duck hunting in Victoria*

<sup>83</sup> Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill 2025 (NSW) p5 [8-32] 8

<sup>84</sup> Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill 2025 (NSW) p5 [8-32] 8

<sup>85</sup> Dunn (2013) *Governance Review of the Game Council of NSW*, p11

<sup>86</sup> Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill 2025 (NSW) p6 [3-9] 9 (1)(f)

<sup>87</sup> GPAHE (n.d.) "Far-Right Hate and Extremist Groups, Australia", <https://globalextrémism.org/australia/>

<sup>88</sup> McKenzie & Galloway (2023) "Senior neo-Nazi slips out of Australia hoping to fight Russian army", <https://www.smh.com.au/national/senior-neo-nazi-slips-out-of-australia-hoping-to-fight-russian-army-20230322-p5cudj.html>

of firearms and prevention of animal cruelty.<sup>89</sup> In response to the same query, NSW Police said “it would not comment on specific investigations, individuals, or groups, but was monitoring the activities and rhetoric of racist and extremist groups”.<sup>90</sup> At the time of writing, over two years after concerns about the ANA were raised, the group remains an approved hunting organisation.<sup>91</sup> Most approved hunting organisations are unlikely to hold the extreme views of the ANA, but any influence available to such an organisation is not in line with the NSW Government’s stated opposition to extremism.<sup>92</sup>

The proposed Conservation Hunting Authority would be equipped to represent the interests of hunters, but it does not appear that it would be equipped to promote the overall objective of conservation in NSW. The Authority risks repeating some of the “severe governance failures” that led to the abolition of the Game Council which it seeks to replace. The ability of extremist groups to nominate members of the Authority is concerning.

**Recommendation 6:** The ability for extremist groups to become approved hunting organisations in NSW should be reviewed.

**Recommendation 7:** The proposed Conservation Hunting Authority should not be established.

**Recommendation 8:** If the authority is established, its membership, objects and functions should be amended to balance the needs of conservation with other elements of the proposed Conservation Hunting Authority.

- **8a:** Representatives of hunting organisations should not constitute a majority of the voting members of the Authority.
- **8b:** A majority of the Authority’s membership should have expertise in conservation and land management.

---

<sup>89</sup> NSW Department of Primary Industries (2022) *NSW Game Hunting Licence Code of Practice*, <https://www.dpi.nsw.gov.au/hunting/rules-and-regulations/nsw-ghl-code-of-practice>

<sup>90</sup> McKenzie & Galloway (2023) “Senior neo-Nazi slips out of Australia hoping to fight Russian army”

<sup>91</sup> NSW Department of Primary Industries (n.d.) “Approved Hunting Organisation directory”, <https://www.dpi.nsw.gov.au/hunting/clubs-and-associations/approved-hunting-organisations-full-listing>

<sup>92</sup> Beatty, Wang & Evans (2024) “‘Not welcome’: Minns unleashes on neo Nazis”, <https://au.news.yahoo.com/masked-men-descend-small-town-102819256.html>

# Conclusion

The Game and Feral Animal Legislation Amendment (Conservation Hunting) Bill 2025 would be unlikely to deliver on its stated purpose of conservation. It carries the potential to damage conservation efforts across the state, as well as to threaten the underpinnings of NSW's gun control regime. The Bill elevates the "rights" of shooters above other visitors to NSW public land and would erode the foundation of Australian gun control.

The Bill seeks to enshrine the controversial position that recreational hunting represents a key conservation technique. Proponents of the Bill list conservation and the management of invasive species among the reasons for their support of it. However, the approaches the Bill proposes to manage these issues has little evidence of success in Australia. The legislation includes few, if any, protections against potential situations where hunting would threaten conservation efforts in NSW.

A cohesive and coordinated approach to conservation and invasive species would best serve the interests of NSW. This Bill does not represent such an approach.