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APDHA SUBMISSION

NSW Animal Welfare Reform Discussion Paper, July 2021

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ANIMAL WELFARE IN A HUNTING CONTEXT

WHO ARE WE?

The Australian Pig Doggers and Hunters Association (APDHA) is the peak body representing legal, ethical pig hunters nationwide.

It was incorporated in Queensland in 2005 and seeks to represent the interests of its national member base to government, private landholders and the general public as well as provide education, legal guidance and leadership to its membership.

Our base position is that hunting in general, and specifically using well trained and managed dogs, is a legitimate cultural activity that also provides significant environmental, agricultural and economic benefits to the community.

Our membership is required to adhere to a strict Code of Conduct (see attachment) which features a strong animal welfare focus.

We fully accept and respect community concerns about animal welfare whether expressed through legislation or the concept of social licence and seek to maintain a welfare focus while dealing with the realities of animal control.

WHAT DO WE DO?

The APDHA is formally recognised by the NSW Government as an Authorised Hunting Organisation (AHO) under the Game and Feral Animal Control Act 2002 with responsibility for insuring, educating and, if required, disciplining members who are entitled to seek approval to hunt on certain public land in NSW under the Restricted Hunting Licence system.

The association was also a key contributor to the NSW Government's statewide pest management review and has also been party to the rural crime review, a consultative process that led to the significant strengthening of laws which had the effect of exposing trespassers and illegal hunters to prosecution under animal welfare laws as well as those dealing with trespass and theft.

In the Northern Territory we are in partnership with the Northern Territory Government through the Department of Parks and Wildlife to assist in the management of feral pigs in environmentally and culturally sensitive National Park estate. Our NT leaders manage access, reporting and resource allocation for research and control of feral pigs on behalf of the department.

In Queensland, our advice and input was sought in the development of amendments to the Animal Management (Cats and Dogs) Act 2008 to ensure anyone using a defence of hunting in a matter in which a dog confronts another animal had to be able to prove they were hunting legally on private land ie with explicit landholder knowledge and approval and within relevant laws requiring no unreasonable nor unjustifiable pain or distress and within the parameters of Biosecurity legislation.

We are also a contributor via submission and follow-up meetings and advice to the review of the Queensland Animal Care and Protection Act 2001 this year.

We are an invitee and participant in the National Biosecurity Roundtable with special interest in the humane management of animal pests among other considerations as well as a participant in the development of the nationwide African Swine Fever management plan.

Underpinning all of this is our code of Code of Conduct to which members are required to become a signatory and which is enforced by the APDHA and its executive.

WHAT WOULD WE LIKE THE REVIEW TO CONSIDER?

Our submission in relation to the NSW Animal Welfare Reform Discussion Paper acknowledges and supports the focus on welfare in all animal-related activities and, in particular, in relation to the use of dogs in hunting.

We acknowledge and support the review's aim to improve animal welfare in NSW and believe the review has the potential to improve animal welfare outcomes in hunting as a cultural/recreational pursuit and as a supplementary means of managing pest animals.

(Here it is worth noting that the CSIRO recognises the use of dogs as part of the pest control tools 'can be highly effective...though we consider unlikely to be considered humane by many'¹.

The APDHA notes the guess as to how many people might or might not regard hunting with dogs as humane is not backed by any supporting research, however, we acknowledge concerns exist.)

We also acknowledge that the use of dogs in hunting is covered specifically in the Feral Animal Control Act 2002 in which hunting is allowed on some NSW public land under certain conditions and such use is on the basis that it does not contravene the NSW Prevention of Cruelty to Animals Act, 1979.

Hunting is also mentioned as a conditional defence in the NSW Prevention of Cruelty to Animals Act 1979 (Part 2 Section 24).

However, we believe animal welfare issues in relation to hunting pigs with dogs can be further addressed either through the addition of some specifics in the Prevention of Cruelty to Animals Act itself or through a Code of Practice that offers more detailed information on how legal, ethical hunters can comply with the letter and intent of welfare law.

To that end, we would ask the review to consider:

- The relevant defence of hunting to various cruelty offences.
- Specific definition of what would constitute acceptable hunting activity.
- A clear path to compliance through mandatory education on animal welfare.
- Mandatory hunter membership of an Authorised Hunting Organisation for legal hunting on private land in addition to the existing public land requirement.
- Development of an enforceable Code of Conduct.
- The implementation of the suggested outlawing of animal cruelty material.

HUNTING AS A DEFENCE/SPECIFIC DEFINITIONS

Hunting as a conditional defence is contained in:

Prevention of Cruelty to Animals Act 1979

Part 2, Section 24,

1: In any proceedings for an offence against this Part or the regulations in respect of an animal, the person accused of the offence is not guilty of the offence if the person satisfies the court that the act or omission in respect of which the proceedings are being taken was done, authorised to be done or omitted to be done by that person—

b, in the course of, and for the purpose of—

*(i) hunting, shooting, snaring, trapping, catching or capturing the animal, or
(ii) destroying the animal, or preparing the animal for destruction, for the purpose of producing food for human consumption,
in a manner that inflicted no unnecessary pain upon the animal.*

The specific area in which we believe there can be a clearer focus is:

in a manner that inflicted no unnecessary pain upon the animal.

Our members seek to comply with all relevant laws in relation to hunting with dogs. They also seek the freedom to pursue legitimate cultural, traditional and recreational hunting within those laws. In some cases this involves the support of Indigenous hunters and Traditional Owner communities to further their goals and aspirations.

(Indeed, to again cite the CSIRO's view on the issue; 'While feral pigs are not widely seen as desirable, they are popular for recreational hunters including Aboriginal and Torres Strait Islander hunters...' ¹²)

(Further, hunting pigs with dogs by Traditional Owners as represented by Raymond McIvor, Senior Ranger, Balngarrawarra Rangers, Cooktown, is seen as 'very important' in community activity, supplementary pest animal management and food gathering. 'It's a good way to spend time in the bush. Good for the country and good for us. Hunting is very important to us.' ¹³)

We actively engage with members and the broader pig hunting community to clarify hunters' legal responsibilities. Education on the concept of social licence in relation to hunting forms a part of that engagement. Our activity within the national hunting community has shown us the best way to progress animal welfare issues is through the active management of hunters and their activities through engagement, education and accreditation.

With that in mind we believe a proactive engagement in relation to pig hunting with dogs in NSW will achieve greater animal welfare outcomes than any other approach.

How many hunters and dogs are there?

In NSW, the DPI Game Management Unit in its Economic Impact of Recreational Hunting in NSW report (May 2017)⁴ reported a total hunting cohort of 226,000 people (all hunting styles) with 19,000 licensed to hunt specified public land and 207,000 hunting private land.

The Game Unit's licensing figures also show a total of 11,193 hunters qualified and licensed to use dogs on public land.

Using the percentage of licensed (dog) hunters when compared to all licensed hunters (58.9 per cent) to compare to the total hunting population (226,000), one estimate of pig hunters using dogs in NSW is more than 133,000.

We prefer to take a conservative approach to that sort of calculation and suggest a range of between 70,000 and 100,000 pig hunters using dogs in NSW.

Our most conservative estimate of the number of pig hunting dogs in NSW would then be 140,000 based on our lowest estimate of active pig hunters (70,000) and up to 200,000 dogs based on our highest conservative estimate of hunter numbers (100,000).

The further break down those figures, again conservatively, at least 50 per cent of those dogs would make physical contact with pigs at some point during hunting. So, between 70,000 and 100,000 will be directly affected by this animal welfare review.

That is one of our members' prime motivators in looking for a managed and thoughtful discussion of animal welfare reform which includes a stepped approach with a clear compliance path.

Addressing the animal welfare concerns

The APDHA is part of the animal welfare solution in a regulated hunting framework. It is conscious of community concerns and proactive in policy development.

In this case the association suggests the amendment of the Prevention of Cruelty to Animals Act 1979 to include specific mention of hunting pigs with dogs to help achieve the welfare review's objectives.

We refer to:

Part 2, Section 24,

1. In any proceedings for an offence against this Part or the regulations in respect of an animal, the person accused of the offence is not guilty of the offence if the person satisfies the court that the act or omission in respect of which the proceedings are being taken was done, authorised to be done or omitted to be done by that person—

b, in the course of, and for the purpose of—

- (i) hunting, shooting, snaring, trapping, catching or capturing the animal, or**
- (ii) destroying the animal, or preparing the animal for destruction, for the purpose of producing food for human consumption,**
- in a manner that inflicted no unnecessary pain upon the animal.**

Amend to include;

(iii) in the case of hunting feral pigs with dogs, avoiding unnecessary pain shall be satisfied by predominantly using dogs to find and bail pigs, with the exception being contact to safely control the pig in one spot for immediate dispatch or to intercede if the pig attempts to attack the hunter or dog, and

(iv) the use of dogs to hunt pigs is conditional upon the hunter being a financial member of an Approved Hunting Organisation and completing the required animal welfare education program

We believe specifying what is allowed brings the use of dogs in hunting and controlling feral pigs more into line with the use of stock dogs in the act of mustering (as mentioned in POCTA Section 21, Live baiting, coursing and other similar activities prohibited, which in part (3) allows a defence to 'any proceedings for an offence against subsection (1) if the defendant shows that the act constituting the alleged offence was done by the defendant in the course of, and for the purpose of—

(a) **mustering** stock, the working of stock in yards or any other animal husbandry activity').

In mustering, a level of pursuit and contact is deemed acceptable. It is self-managed by the livestock industry on the basis that there is a direct benefit to compliance though higher animal welfare standards leading to financial gain (setting aside altruism and a base level respect for animals which is effectively argued by our colleagues on the land).

In hunting, we would seek the same consideration on the basis that compliance to a higher animal welfare standard will provide hunters with the direct benefits of being able to confidently continue to hunt legally as well as keep the thousands of hunting dogs in NSW engaged in a biologically fulfilling activity (again, setting aside altruism and a love of the dogs involved and respect for their quarry.)

This compliance would be demonstrated in the first instance by the willingness of hunters to join an Authorised Hunting Organisation for private land hunting as well as public land and the further willingness to undertake animal welfare education (see next section...)

These two factors alone would also effectively remove hunting as a defence for using dogs to hunt pigs, if the hunter was not a financial member of an AHO or failed to undertake the relevant training.

They would also spread the compliance load to AHOs which could act to sanction members for breaching the AHO's own Code of Conduct (as required under the Feral Animal Control Act 2002).

EDUCATION ON ANIMAL WELFARE

An education component in legal, ethical hunting is already a requirement under the Game and Feral Animal Control Act 2002, however, it does not specifically address animal welfare concerns in relation to using dogs to hunt pigs on private land.

We would argue an approved education module could be either developed by the DPI Game Licensing Unit and delivered by the existing network of LEAP (Learning, Education and Accreditation Program) or developed and delivered by the APDHA after approval by the relevant State administrative authority.

Whether the modules are developed by the DPI or the APDHA, the key elements of the concept in our view are:

- The capacity for the requisite education modules to be delivered electronically.
- Modules should include animal welfare, biosecurity, the law etc.
- Modules should generate a dated Certificate a hunter can be asked to produce.
- The cost of education provision should be recouped from hunters.

Further, using hunter representative bodies to help develop and deliver the education will:

1. Reduce potential resistance to a new focus on compliance.
2. Use an existing and effective communication network to disseminate the message.
3. Improve comprehension of the animal welfare imperative.
4. Provide a pathway to compliance.
5. Help short-circuit the 'them and us' potential response which can fuel more clandestine activity as some sort of 'heroic' defiance of authority.

AHO MEMBERSHIP FOR PRIVATE LAND HUNTING

A requirement to join an AHO for public land hunting has been accepted by the NSW (and broader) hunting community as the price to pay for the privilege of hunting certain parcels of public land in the State.

Public land hunting licences (the Restricted Hunting Licence) in NSW number about 19,000 with a further 207,000 hunters accessing private land (according to the *Economic Impact of Recreational Hunting in NSW, Final Report, Game Licensing Unit, Department of Primary Industries, May 23, 2017.*⁴)

We believe the AHO membership requirement should be expanded to include those using dogs to hunt pigs on private land as well. It could include all hunters, of course, but we seek to speak on what we know best and leave other AHOs to deal with their areas of expertise.

Under the AHO system in NSW, hunting organisation applications must among other things:

*c. Be accompanied by a copy of the hunting club or organisation's constitution that contains a hunting code of practice in line with the NSW Hunters' Code of Practice (see Attachment A) and disciplinary procedures for members who breach relevant legislation (as listed in Attachment B) or the NSW Hunters' Code of Practice*⁵

The disciplinary procedures allowed under the AHO system have the potential to render a hunter unable to hunt legally if they breach AHO policies, particularly in relation to animal welfare.

Ineligibility for AHO membership can then be communicated to the DPI Game Licensing Unit which can in turn communicate with Police NSW.

It provides a legal means of animal welfare guideline enforcement that operates at hunter-to-hunter level.

Using the existing AHO system in a stepped process such as this will, in the association executive's opinion:

1. Reinforce in hunters' minds the need to conform to conditional approval with animal welfare as a priority in their activities.
2. Keep hunting with dogs visible and accountable.
3. Provide a compliance path for those who understand the importance of the issue.
4. Provide a clearer prosecutorial path for those who refuse to comply.
5. Create a means of effectively communicating with all NSW hunters using dogs to facilitate ongoing education and information.
6. Reduce the incidence of 'under the radar' hunting activity which would remain uncontrolled and unregulated.
7. Improve actual animal welfare outcomes through education, hunter awareness and ongoing communication.

DEVELOP AN ENFORCEABLE CODE OF PRACTICE

As a support mechanism to our suggested animal welfare path in relation to hunting pigs with dogs the APDHA also seeks the development of an enforceable Code of Practice for hunting pigs with dogs on private land as well as public.

We see the creation of a Code as further underlining the need for an animal welfare focus and offering greater clarity on the issue through specific explanation of the legal expectation.

It might also be used to minimise or simplify any legislative changes though the addition of 'hunters must abide by the Code of Practice' instead of the range of options we have already suggested

A Code of Practice might include:

1. Make conditional the use of bailing or holding actions by dogs in pig hunting/pest control.
2. Hunters to prove they have landholder permission to hunt.
3. Include in the Code the (POCTA) Act's requirement to limit pain to the pig.

4. Define how that is to be done ie limit contact by dogs, kill quickly and humanely.
5. Define what a breach of the requirement would look like.
6. Require that hunters using dogs be better educated and accredited.
7. Require that hunters using dogs become members of an accredited organisation.

Definitions and notes on the Code of Conduct:

Bailing dogs locate, chase and bark or stare at pigs to keep them in one place.

Holding dogs make contact with the pig to keep it in one place to allow for safe destruction. We would seek to define the allowed contact as 'to safely control the pig in one spot for immediate dispatch or to intercede if the pig attempts to attack the hunter or dog'.

Hunters are already required under law have permission to hunt on private land or risk prosecution Under the Inclosed Lands Protection Act 1901 Section 4B⁶. The Code simply reinforces that.

Humane killing could be included in the education but might be based on a bullet to the brain or heart or a knife to the heart to cause a rapid death via massive intra thoracic haemorrhage. A bullet in the heart is described as a rapid death in the Queensland Standing Committee on Agriculture, Animal Health Committee Model Code of Practice for the Welfare of Animals, Feral Livestock Animals, Destruction or Capture, Handling and Marketing. 1992. Page 4. A knife creates the same damage to facilitate a rapid and humane death.⁷

Breaches could be defined as anything other than the use of dogs as described that had the result of inducing any unnecessary pain.

The clarity of the Code of Practice to make breaches easier to prosecute

- Breaches of the Code of Conduct will be easier to investigate and prove.
- Hunters adhering to the Code will be demonstrably focussed on animal welfare.
- Hunters breaching the Code will be demonstrably not focussed on animal welfare.
- A failure to prove legal access to hunt can expose a person to cruelty prosecution.
- Mandated membership of an accredited hunting organisation provides a single point of contact between legislators and hunters reducing communication 'black spots'.
- Completion of approved education modules clarifies the intent of the legislation.

A NEW OFFENCE TO BE DEVELOPED

Production and distribution of animal cruelty material

We absolutely support this suggestion. It is separate to hunting, however, we support the concept on principle and because it provides an enhanced capacity to capture illegal hunting activity.

In a hunting context we see this offence including any video, photographs and even sound recordings which capture illegal hunting activity including breaches of State animal cruelty legislation.

Examples of breaches could include animals being killed by dogs, unlawfully attacked by dogs, dogs being allowed to hold/bite animals eg feral pigs for an excessive amount of time and other instances that display wanton animal cruelty.

Of course, the primary goal is to capture other activities rather than just illegal hunting, but we see a benefit in such a statute creating another path to hunting compliance.

As stated in the discussion paper, there would need to be the capacity to share these videos for the purposes of bringing them to attention for prosecution etc but we support the goal would be to prosecute gratuitous animal cruelty.

OTHER FACTORS

1. NSW based members of our Association join us in seeing legal and ethical hunting, particularly with dogs as a legitimate cultural activity and would seek to be able to continue this cultural practice albeit within the boundaries on the community's interest in animal welfare issues.
2. NSW based members of our Association are also concerned that their legal hunting activities outside the State could bring them into conflict with any legal changes as it affects hunting in NSW (possession of hunting equipment etc).
3. The pest management community representatives to whom we have spoken are concerned a misstep on this on using dogs in pest management roles (whether paid contracts or volunteer operations) will unreasonably restrict the options available to achieve effective environmental, agricultural and Biosecurity outcomes. (It is a given within the pest management community, including government departments that no one method of animal control can achieve the necessary results if used in isolation. Trapping, poisoning, exclusion fencing and follow up hunting are necessary to achieve an ongoing 70 percent reduction in pest populations.)
4. The landholders to whom the association has spoken are concerned a misstep on legislation in relation to the use of dogs might rule out effective location and control of pest populations of animals in certain terrain that is too thick to shoot and too rough to fence.
5. The same landholders are concerned an ill-considered legislative change on the use of dogs might rule out the most effective way to locate and remove trap shy and poison shy animals, thereby contributing to not only the development of secure habitat for pests but also a better educated pest animal.

6. A recent economic impact statement released by the NSW Department of Primary Industry listed recreational hunting as the fourth largest economic driver in NSW primary industry with a value of \$1.541 billion. That was more than wool, cotton, wheat, sheep and goat meat. This result has been achieved largely on the basis of a well regulated hunting culture subject to animal welfare controls and enforcement.

End Notes and Attachments

¹ CSIRO Submission 18/641 'The impact of feral deer, pigs and goats in Australia' to the Senate Standing Committee on Environment and Communications, November 2018. P 14.

"Hunting, using dogs to help locate and corner pigs, can be highly effective in removing pigs that have evaded other means on control (Caley and Ottley 1995), and has successfully been used in eradication programs of pigs on islands (Ramsey et al. 2009; Parkes et al. 2010). It may be required in the advent of an exotic disease outbreak requiring localised eradication or very high levels of population suppression. Hunting, using dogs that are capable of catching pigs and holding pigs prior to being dispatched by a hunter, is widely practised, though we consider unlikely to be considered humane by many..."

² CSIRO Submission 18/641 'The impact of feral deer, pigs and goats in Australia' to the Senate Standing Committee on Environment and Communications, November 2018... "While feral pigs are not widely seen as desirable, they are popular for recreational hunters including Aboriginal and Torres Strait Islander hunters so regulating pig numbers for the long term at regional levels and removing pigs entirely and for the long term at local scales has always been challenging. Australian wild pig meat has historically had good overseas markets, though demand has softened as wild boar populations have recovered strongly in Europe. Despite this, Aboriginal and Torres Strait Islander corporations are considering pig harvesting an input resource for other potential industries such as fertilizer production, and the CSIRO is playing a key role in researching these initiatives (e.g. <https://events.csiro.au/Events/2016/November/25/Science-with-Sushi-Seminar-Series-Justin-Perry>)."

³ Raymond McIvor, Senior Ranger, Balngarrawarra Rangers, Cooktown, FNQ.

"We look after cattle country and other places where we don't want cattle or pigs because of the damage they can do to the environment and special places. We manage native animals too to keep them out of caves and places where there are paintings.

"We set traps to catch pigs and also use dogs. The trapping doesn't work all the time because there can be too much tucker in the bush and the pigs won't trap.

"We also go out together for a bit of a fish and a pig. If we get a nice fat one with the dogs we bring it home to eat. We might get 15 or 20 pigs but we bring home a nice fat one for everyone to eat.

"It's a good way to spend time in the bush. Good for the country and good for us. Hunting is very important to us."

Interview with Ned Makim, May 9, 2021.

⁴ Economic Impact of Recreational Hunting in NSW, Final Report, Game Licensing Unit, Department of Primary Industries. May 23, 2017. RMCG, EconSearch and DBM Consultants.

https://www.dpi.nsw.gov.au/data/assets/pdf_file/0007/723454/economic-impact-of-recreational-hunting-in-nsw.pdf

⁵ *NSW Approved Hunting Organisations approval and management policy.*

https://www.dpi.nsw.gov.au/data/assets/pdf_file/0008/597212/aho-policy.pdf

Also available as an attachment to this submission.

⁶ *Inclosed Lands Protection Act 1901.*

4B Aggravated unlawful entry on inclosed lands

(1) A person is guilty of an offence under this section if the person commits an offence under section 4 in relation to inclosed lands on which any business or undertaking is conducted and, while on those lands—

(e) without reasonable excuse, possesses, places or uses any net, trap, snare, poison, explosive, ammunition, knife, hunting device or hunting equipment, or

(f) without reasonable excuse, possesses or discharges a firearm (within the meaning of the Firearms Act 1996) or a prohibited weapon (within the meaning of the Weapons Prohibition Act 1998), or

(g) is accompanied by a dog of a breed ordinarily used for hunting,

<https://legislation.nsw.gov.au/view/whole/html/inforce/current/act-1901-033#sec.4B>

⁷ *Standing Committee on Agriculture, Animal Health Committee Model Code of Practice for the Welfare of Animals, Feral Livestock Animals, Destruction or Capture, Handling and Marketing. 1992. Page 4.*

- for heart shots, bullets should be aimed at the forward chest above the point of the elbow. Death, due to massive intra thoracic haemorrhage, is rapid

<https://www.publish.csiro.au/book/370>

Attachment #1

The APDHA Code of Conduct

THE AIM OF THE CODE IS TO PROMOTE SELF-REGULATION AND ENSURE USING DOGS IN THE MANAGEMENT OF FERAL PIGS REMAINS A LEGITIMATE AND LEGAL MEANS OF PEST CONTROL, FOOD GATHERING AND RECREATION. THE APDHA SEES THE USE OF DOGS AS EFFECTIVE IN CONTROL OF A POTENTIAL BIO-SECURITY THREAT, HAVING PARTICULAR CULTURAL AND RECREATIONAL VALUE AND INTEGRAL TO THE GENERATION OF DOMESTIC AND EXPORT INCOME.

While various methods of wild animal management can be effective, an integrated approach is recognised as the most effective, particularly in relation to wild (or feral) pigs. Hunting with dogs allows the handler to dispatch animals that are concealed in their environment and still be able to observe the live animal and its carcass for signs of exotic disease. It is widely used because of its adaptability to the different environments found in this country as well as its cultural significance. Capturing feral pigs is a specialised operation. Training should be provided for people and dogs to ensure a skilled process of dog handling and humane slaughter.

1. Housing requirements:

- a. Kennels must protect dogs from rain, wind, extreme heat and cold.
- b. Kept clean, hygienic and free from odour.
- c. Be designed and maintained to avoid injury/escape.
- d. Of sufficient size to allow dogs to be comfortably and humanely housed.
- e. Be kept in such a way as to not cause a nuisance to others.
- f. Be kept in such a way as to reduce stress to the dog.
- g. Fencing must not allow dogs to roam from premises where they are kept.
- h. Bitches on heat must be securely confined.

2. Care of dogs:

- a. Fresh, clean water must be provided at all times.
- b. Diet must be balanced and maintain health.
- c. Dogs must receive prompt veterinary attention when and if required.
- d. Dogs must be treated on a regular basis for external/internal parasites.
- e. Dogs must be vaccinated as advised by a vet.
- f. Dogs must be kept in good physical health.

3. **Keeping of dogs:**

- a. Dogs are to be kept with reference to applicable local, state and federal laws.
- b. Dogs should be sought with the lifestyle and needs of the owner in mind.
- c. Dogs are to be identifiable at all times. The minimum requirement is local council registration. Microchipping and tags displaying owner's name and phone number and identification, where not mandatory, are also encouraged.

4. **Training of dogs:**

Dogs should be :

- a. Well trained and obedient, through the use of appropriate and humane methods.
- b. Stock proof and socialised with other dogs, animals and people.
- c. Discouraged from exhibiting anti social and undesirable behaviour.
- d. Under appropriate control at all times.
- e. Trained either to bail or to hold pigs with the minimum of contact needed to keep the pig in one place.

5. **Sale of Pups/Dogs:**

Dogs are to be:

- a. Bred from animals which are healthy, of good temperament and free from known genetic faults.
- b. Properly represented at time of sale.
- c. Guaranteed to work unless new owner is advised otherwise.
- d. Vaccinated unless new owner is advised otherwise.
- e. New owners are to be advised on parents' temperament, appropriate care, training and housing for their new dog.
- f. Pups/dogs must only be sold to suitable homes. Fencing, use, yard size, children and other circumstances must be taken into account before sale.
- g. Pups and dogs are not to be homed as pets unless their temperament is suitable for such a lifestyle and the new owner is properly advised of their need for exercise, training and stimulation.

- h. Dogs not specifically required for breeding are to be desexed before rehoming, or the new owner advised to desex the dog at a more suitable age.
- i. All relevant laws in relation to dog breeding are to be followed.

6. Transportation of Dogs:

- a. When travelling on public roads, dogs must be suitably restrained, crated, tied or caged and protected from the elements. In the case of tying, the lead must be short enough so the dog cannot fall from the edge of the tray or tub back of a utility or four-wheel-drive. In the case of cages and crates, ample room must be available for each dog to comfortably stand, turn around and lie down.
- b. When hunting in the field, dogs being worked do not have to be restrained as above.

7. Working of Dogs:

- a. The weather conditions, temperature and fitness of the dog are to be taken into account when being worked so as to not cause stress to the dog.
- b. Tracking collars, where not mandatory, are strongly encouraged.
- c. Dogs must wear protective gear when working. Minimum requirement is a neck collar, which protects the throat and neck. Breastplates, vests, tracking collars, reflective tags, flashing tags and glow tags/sticks, where not mandatory, are also encouraged.

8. Number of dogs used on a pig:

Maximum number of dogs on a pig at any time is:

- 2 holding dogs
- 2 bailers
- 1 pup in training.
- The fewer dogs the better. The number of dogs you need will depend on their working ability, size/condition of the pigs and country you are hunting. We advocate the use of the minimum number of dogs required to catch and allow for the effective and safe dispatch of the pig without causing undue stress to either animal.

9. Handling and dispatch of pigs:

- a. The dispatch of the pig should be carried out with full regard for the welfare of the animal. It is unacceptable to use killing methods that:
Cause severe and prolonged pain and distress.
Result in deliberate mortal wounding of animals so that they die later away from the shooting or capture area.
- b. The Queensland Animal Care and Protection Act 2001 (as an example) specifies unacceptable behaviour which is classed as cruelty to an animal, including to:
 - Abuse, terrify, torment or worry it.
 - Overdrive, override or overwork.
 - Kill it in a way that is inhumane, cause it not to die quickly, or cause it to die in unreasonable pain.
 - Unjustifiably, unnecessarily, or unreasonably injure or wound an animal.
- c. Use of dogs to handle captured feral animals should be minimised. The aim at all times should be to handle captured animals quietly.
- d. It is preferable that dogs be only used to locate and bail feral pigs to enable humane dispatch. Dogs must respond to commands from the controller/handler and not harass the pig.
- e. Holding dogs should be used to hold the pig for the shortest time possible while the pig is humanely dispatched.
- f. The use of dogs to attack, mutilate or bring down a pig should not be allowed. It is an offence in some areas to allow dogs to do this.
- g. When the pig has been caught, it must be dispatched humanely and as quickly as possible. All captured pigs are to be dispatched. Catch and release must not occur. It is illegal in every State and Territory in Australia.
- h. Methods used to dispatch pigs must be rapid, effective and the most humane alternative possible to minimise pain and distress.

Option 1

The handler controls the dogs so that they are positioned safely to enable dispatch of the pig with an accurate shot to the head. (See diagram a - for shot placement).

Firearm user must hold the relevant licenses in their state, and the calibre of gun to be used must be a minimum .22 magnum.

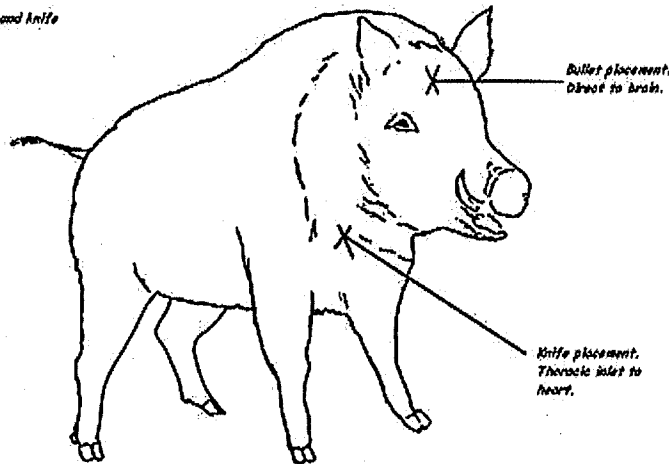
Option 2

Dogs control the pig to enable the hunter to grasp and restrain the pig so that a single knife stick to the heart can dispatch it. (See diagram a below for knife placement). Knife must be of good quality with a steel blade with a minimum blade length of 170mm.

To ensure that the welfare of the pig is considered at all times, training in these procedures is essential to ensure the procedure is efficient and effective. No training must take place on a live animal.

- i. If carcasses are not used for human or animal consumption they must be disposed of as requested by the landholder. It is desirable to cut the stomach to speed up decomposition. Under no circumstances are carcasses to be dumped along public roads, on public land or at Council tips, unless at specific dead animal facilities.

Diagram A for shot and knife placement.



DISCIPLINE POLICY

All members must read the rules. Ignorance is no excuse.

1. The association committee has the power to fine, suspend and/or expel any member who is convicted of an offence relating to hunting, i.e. cruelty to animals, trespass (illegal hunting) etc.
2. Violation of the APDHA code of conduct, procedures, by-laws or other applicable rules may be the subject of discipline, up to and including removal from the association, as recommended by the President and approved by the committee.
3. The President shall have discretion to immediately and temporarily suspend any member (as detailed in the APDHA Policies and Procedures) pending a hearing and consideration by the

committee of further discipline, if immediate action is deemed necessary for the protection of the association.

4. The person shall be notified and given a chance to request reversal of the suspension as detailed in the APDHA Policies and Procedures.

Approved & adopted by the Australian Pig Doggers & Hunters Association Inc. April 2005. Amended January 2016 and February 2019.



Department
of Industry

Policy

Approved Hunting Organisations (AHOs) approval and management

NUMBER GLUAHO0814

VERSION 2

AUTHORISED BY Director Game Licensing

AUTHORISED DATE 01/09/2014

ISSUED BY Game Licensing Unit

EFFECTIVE DATE 01/09/2014

Policy Statement

It is a requirement of the *Game and Feral Animal Control Act 2002* (the Act), Part 3, Division 3, Section 19 that NSW Game Hunting Licence Holders must be a member of a hunting club or organisation that is approved by the Regulatory Authority. The Regulatory Authority is the Secretary Department of Industry, Skills and Regional Development, delegated to the Department of Primary Industries (DPI) Game Licensing Unit.

Approved hunting clubs or organisations are called Approved Hunting Organisations (AHOs) for the purposes of Section 19 of the Act. This policy is in place to ensure that a consistent approach is applied to the management and monitoring of AHOs under this legislation.

Scope

This policy applies to a hunting club or organisation who applies to, or who is currently approved by, the Regulatory Authority as an AHO. This includes hunting organisations approved by the Game Council of NSW before its dissolution, in accordance with the Act.

This policy does not apply to any other role performed by the AHO (such as accreditation as a training provider).

Requirements

1. Application to be an Approved Hunting Organisation

Applications by hunting clubs or organisations to be Approved Hunting Organisations must:

- Be on the approved form provided on the DPI Game Licensing Unit webpage, www.dpi.nsw.gov.au/hunting.
- Nominate a minimum of two office bearers from the hunting club or organisation as contacts.
- Be accompanied by a copy of the hunting club or organisation's constitution that contains a hunting code of practice in line with the NSW Hunters' Code of Practice (see Attachment A) and disciplinary procedures for members who breach relevant legislation (as listed in Attachment B) or the NSW Hunters' Code of Practice.

2. Maintaining Approved Hunting Organisation status

In order to maintain Approved Hunting Organisation status hunting clubs or organisations must:

- Ensure that the provisions listed in 1b and 1c above remain current for the period that they retain Approved Hunting Organisation status.
- Notify the Game Licensing Unit within 14 days of any circumstances that may give rise to the organisation no longer being compliant with the AHO requirements listed in this policy.
- Comply within the nominated timeframe with any requests for information from the DPI Game Licensing Unit as part of Approved Hunting Organisation audit processes.

- d. Notify the Game Licensing Unit of any changes to the organisations details, including the name and contact details of nominated contact officers within 14 days of the change occurring.
- e. Ensure that a current actively monitored phone number and email address is provided to the DPI Game Licensing Unit, for the purposes of effective communication;
- f. Notify the DPI Game Licensing Unit of any breaches to relevant legislation (as listed in Attachment B) or to the NSW Hunters' Code of Conduct (as listed in Attachment A), by any member that holds a NSW Game Hunting Licence.
- g. Ensure the timely communication of material supplied by the DPI Game Licensing Unit to their members.

3. *Audit of Approved Hunting Organisations*

Audits will be conducted by the Game Licensing Unit on Approved Hunting Organisations using the following guidelines:

- a. Audits will be conducted annually on a randomly selected basis.
- b. AHOs will be notified of their audit in writing via email.
- c. AHOs must provide evidence of compliance with this policy to the DPI Game Licensing Unit within six weeks of the date of the email referred to in 3 (b).
- d. Audit records will be retained for all audits for evidentiary purposes.
- e. Where there is concern of non-compliance, additional information may be sought by the DPI Game Licensing Unit from the AHO by a nominated date.
- f. Approved Hunting Organisations who do not respond to the Audit within the nominated timeframe will be determined as being non-compliant and may have their AHO status suspended or cancelled.
- g. Non-compliance with an audit request or a finding of "non-compliant" after an audit may see the organisation's AHO status suspended or cancelled.
- h. All audited AHOs will receive correspondence within six weeks of the completion of an audit that details the audit outcomes.
- i. Hunting clubs or organisations that have their AHO status cancelled must immediately inform their members that they are no longer an approved organisation to ensure their members can find an alternate AHO for the purpose of maintaining a NSW Restricted Game Hunting Licence.

4. *Suspension or cancellation of Approved Hunting Organisations*

- a. Hunting clubs or organisations may have their AHO status suspended when:
 - i. They fail to respond, comply or cooperate with an AHO audit conducted under this policy
 - ii. They have a "non-compliant" audit finding.
- b. Suspended AHOs may have their AHO status reinstated when:
 - i. They have responded to and complied with audit requests and have returned a "compliant" audit result.
 - ii. They have completed the recommended actions from a "non-compliant" audit report.
- c. Hunting clubs or organisations may have their AHO status cancelled when:
 - i. They fail to respond, comply or cooperate with an AHO audit under this policy on two separate occasions.
 - ii. They fail to comply with actions in a "non-compliant" audit report within three months.
- d. Hunting clubs or organisations that have had their AHO status cancelled will not be considered for AHO status for three years from the date of cancellation.

Hunting clubs or organisations that have had their AHO status cancelled may appeal the decision within 30 working days by writing to:

Director Game Licensing Unit
Department of Primary Industries
Locked Bag 21
Orange NSW 2800

Procedures

The following internal procedures are associated with this policy:

- Approved Hunting Organisations (AHOs) approval procedure
- Approved Hunting Organisations (AHOs) audit procedure
- Approved Hunting Organisations (AHOs) suspension or cancellation review procedures

Roles and responsibilities

Role	Responsibility
Approved Hunting Organisations (AHOs)	▪ Comply with this policy and associated procedures ▪ Maintain up-to-date contact information ▪ Maintain contact with the Game Licensing Unit
Team Leader Strategic Services	▪ Approval of AHOs ▪ Maintenance and management of AHOs and associated policy and procedure ▪ Audit of AHOs ▪ Suspension or cancellation of AHOs
Director Game Licensing	▪ Rule on appeal to suspension or cancellation of AHOs

Safety considerations

- N/A.

Delegations

The Regulatory Authority has delegated the following function relating to approval of AHOs to the Game Licensing Unit:

Delegation	Role
Approval of a hunting club or organisation (Part 3, Division 3, Section 19 Game and Feral Animal Control Act 2002)	Director General, Department of Primary Industries Director Game Licensing Team Leader Strategic Services

Definitions

- Regulatory Authority: Secretary Department of Industry, Skills and Regional Development, delegated to the Department of Primary Industries (DPI) Game Licensing Unit.
- AHO: Approved Hunting Organisation as constituted under the *Game and Feral Animal Control Act 2002*.
- R-Licence: NSW Restricted Game Hunting Licence

Related policies

- N/A.

Other related documents

- N/A.

Revision history

Version	Date issued	Notes	By
1	01/09/2014	N/A	Director Game Licensing
2	19/10/2015	Updated 3 (a) (b) (c) Updated Departmental naming conventions.	Director Game Licensing

Review date

01/09/2018

Contact

Game Licensing Unit
Department of Primary Industries
Locked Bag 21
Orange NSW 2800
(02) 6391 3750
game.licensing@dpi.nsw.gov.au
www.dpi.nsw.gov.au/hunting

Attachment A: NSW Hunters' Code of Practice

1 Awareness of relevant legislation

It is the responsibility of the holder of a game hunting licence to be aware of and comply with all relevant provisions of legislation relating to hunting, animal welfare and the use of firearms.

2 Safe handling of firearms

Where firearms are used, the rules for safe handling set out in the NSW Firearms Safety Awareness Handbook published by or under the authority of the Commissioner of Police must be complied with at all times.

3 Permission required to enter land

A game hunting licence does not automatically authorise the holder of the licence to hunt on any land. The holder of a game hunting licence must not hunt on any land without the express authority of the occupier of the land.

4 Target identification and safety

A game animal must not be fired at unless it can be clearly seen and identified, and the shot when taken poses no discernible risk of injury to any person or significant damage to any property.

5 Obligation to avoid suffering

An animal being hunted must not be inflicted with unnecessary pain. To achieve the aim of delivering a humane death to the hunted animal:

- (a) it must be targeted so that a humane kill is likely, and
- (b) it must be shot within the reasonably accepted killing range of the firearm and ammunition or bow and arrow being used, and
- (c) the firearm and ammunition, bow and arrow, or other thing used must be such as can reasonably be expected to humanely kill an animal of the target species.

6 Lactating females with dependent young

If a lactating female is killed, every reasonable effort must be made to locate and humanely kill any dependent young.

7 Wounded animals

If an animal is wounded, the hunter must take all reasonable steps to locate it, so that it can be killed quickly and humanely.

8 Use of dogs

Dogs and other animals may be used to assist hunters but only if:

- (a) their use is not in contravention of the *Prevention of Cruelty to Animals Act 1979*, and
- (b) their use is with the permission of the occupier of the land concerned.

Attachment B: Relevant Legislation

AHOs must notify the Game Licensing Unit of any member who has:

1. In the previous 10 years been found guilty of an offence under the *Firearms Act 1996* that is, in accordance with section 84 of that Act, an offence that may be (or is required to be) prosecuted on indictment?
2. In the previous 10 years been found guilty of any other offence relating to firearms in NSW or elsewhere?
3. Been found guilty of any offence in NSW or elsewhere in the past 10 years involving cruelty or harm to animals, personal violence, damage to property or unlawful entry onto land?
4. Been found guilty of an offence in NSW of releasing a game animal into the wild for the purpose of hunting the animal or its descendants?
5. In the previous 10 years been found guilty of an offence under section 32C of the *Forestry Act 1916* (before its repeal on 31 December 2012) or under Section 68 of the *Forestry Act 2012* (Offences relating to hunting and using firearms)?
6. In the previous 10 years been refused a hunting permit under section 32B of the *Forestry Act 1916* (before its repeal on 6 August 2004) or under Section 68 of the *Forestry Act 2012* or have had such a permit cancelled?