



THE LAW SOCIETY  
OF NEW SOUTH WALES

Our ref: RIC:SSns120722

12 July 2022

GFAC Regulations Submission  
DPI Hunting  
Locked Bag 21  
Orange NSW 2800

By submission portal

Dear Sir/ Madam,

### **Proposed Game and Feral Animal Control Regulation 2022**

Thank you for the opportunity to comment on the proposed Game and Feral Animal Control Regulation 2022 (“the Regulation”). The Law Society’s Rural Issues Committee has contributed to this submission.

The Regulation seeks to manage the risks posed by game hunting to human safety, animal welfare and native fauna. The Law Society is of the view that several provisions of the Regulation, which seek to lower or remove certain age restrictions, may exacerbate these risks without sufficient public policy justification.

#### **Conditions of game hunting licences**

Schedule 2, Part 1(2) of the Regulation effectively amends Schedule 1, Part 1(3) of the *Game and Feral Animal Control Regulation 2012* to “[allow] young hunters between the ages of 16 and 18 years, who use bows or dogs only, to hunt without the supervision of an adult hunter with the same licence type”.<sup>1</sup> This amendment aligns public land hunting practices with private land practices.

The Law Society considers the current requirement that young people be supervised in these circumstances is appropriate, particularly as hunting on public land requires a greater consideration of the rights and safety of other hunters, members of the public, and native fauna. Although the amendment excludes the use of firearms under a minor’s firearm permit, the use of dogs and bows nonetheless represent a significant safety risk. Accordingly, the Law Society does not support the revised approach in Schedule 2, Part 1 (2) of the Regulation.

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<sup>1</sup> Department of Primary Industries, *Summary of changes and context – proposed Game and Feral Animal Control Regulation 2022*, (2022) 6.

## Restrictions on granting licences

Section 11 of the Regulation effectively deletes section 13(3) of the *Game and Feral Animal Control Regulation 2012*, which provides:

A standard hunting licence or visitor's hunting licence must not be granted to a person who is under the age of 12 years.

This change allows game hunting licences to be issued to individuals under 12 years of age, excluding the use of firearms. While we note the amendment seeks to "[allow] families [to] educate children about safe hunting practice from a young age",<sup>2</sup> the Law Society nonetheless considers the removal of the age restriction altogether to be a significant change, that may not be appropriate in the interests of safety. We submit that section 11 of the Regulation should be amended to effectively reinstate section 13(3) of the *Game and Feral Animal Control Regulation 2012*.

If you wish to discuss these issues or require further information, please contact Nathan Saad, Policy Lawyer, on (02) 9926 0174 or email [nathan.saad@lawsociety.com.au](mailto:nathan.saad@lawsociety.com.au).

Yours sincerely,

A handwritten signature in blue ink that reads "Sonja Stewart". The signature is written in a cursive style with a large, looped 'S' at the beginning.

Sonja Stewart  
**Chief Executive Officer**

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<sup>2</sup> Ibid 1.