


Dear Sir,

Attached is a response to the draft ACT Eastern Grey Kangaroo Management Plan 2017. I will forward a signed copy by mail.

Please acknowledge receipt.

Regards



20 March 2017

Manager,
Conservation Research,
Environment, Planning and Sustainable Development Directorate,
GPO Box 158
Canberra, ACT 2601

[copy by email to: environment@act.gov.au]

**REGIONAL FRIENDS OF WILDLIFE RESPONSE TO THE ACT KANGAROO
MANAGEMENT PLAN 2017 AND THE PROPOSAL TO ADOPT IT AS A
'CONTROLLED NATIVE SPECIES MANAGEMENT PLAN'**

Thank you for the opportunity to comment on the draft Eastern Grey Kangaroo: Draft Controlled Native Species Management Plan dated February 2017.

The Regional Friends of Wildlife (RFW) have written to the ACT government on a number of occasions expressing grave concerns about the unnecessary killing of kangaroos and the claimed scientific basis. The proposed Kangaroo Management Plan 2017 (KMP-17) appears to be a carefully crafted document that cherry picks information and data, out of context, to justify the ongoing killing of kangaroos in the Canberra Nature Park and surrounds. Much of what is written can be likened to 'fake facts' and misinformation. It is disappointing that such a document would be published in its current form, to justify the ongoing and wanton killing of our wildlife.

In commenting on the KMP-17, the RFW wish to point out a number of serious omissions, uncertainties and conflicts. These anomalies make it impossible for a member of the public, or indeed an otherwise informed scientist or policy-maker, to make a considered appraisal of the KMP-17 or find therein any merit for ecological systems or reserve management, as claimed by this otherwise unsustainable and indefensible killing program.

Our questions in regard to this missing information follow.

Please detail the employers or (grant) sponsoring institutions of those who wrote, co-wrote, assisted or peer reviewed each of the eight named scientific papers, which are cited in KMP-17, as supporting assertions that kangaroos are having deleterious environmental impacts. At face value it does not seem these papers can be regarded as independent. They also represent an extremely narrow range of expertise.

Can the Government cite any independent research produced in or out of the ACT to support any of its assertions that kangaroos have ever had a deleterious impact on the natural environment, apart from agricultural-focused research? (Please note: by 'independent', the RFW mean a study by a qualified ecologist/naturalist who is neither wholly nor partially employed by, or grant-funded by, either the ACT

government, or any industry agency, which benefits by way of income, reputation or position from killing animals.)

Will the government publish the full methodology of its alleged surveys of public opinion on kangaroos killing in the ACT?

Who formed the Kangaroo Advisory Committee (KAC); how were they selected; what were their qualifications; how was their independence from the ACT government and the commercial and non-commercial kangaroo killing industries established? Who represented animal welfare and wildlife carer organisations on the committee?

Does the ACT government have any plans for forming a new KAC, which includes animal welfare/animal rights and wildlife carer representation, to provide competent advice on issues such as rescue, rehabilitation, release, translocation, fertility control and the likely impact of mass slaughter?

Given that (a) kangaroos can travel well beyond their home range when distressed, (b) their home ranges expand and contract with food availability, and (c) their home ranges do not end at the borders of the government's 'kangaroo management units', what methodology (if any) does the government use to ensure they are not counting every kangaroo twice, or more, as an animal moves from a reserve where counting is been completed to another area where it will be counted again?

Will the ACT government desist from the charade that conducting killing during the autumn and winter period is intended to minimise the number of dependent joeys killed? If the KMP-17 is correct in asserting that most joeys are born in summer, then these young will be weaned throughout June-August 18 months later. September to October, before the next batch of 11-month-old pouch young begins leaving the pouch, is therefore the only time that most females will have no at foot young in their care.

The KMP-17 makes numerous references to *The Animal Welfare (Humane Shooting of Kangaroos and Wallabies) Code of Practice 2014*. Why does the document not explain the function of this Code? Far from preventing inhumane treatment of kangaroos, the only legislative role of any code or practice in the ACT is to excuse practices that would otherwise be unlawful under the Animal Welfare Act (ACT) 1992. The inhumanness of the ACT Code is clear. It requires that pouch young be bashed to death or decapitated. While it urges that dependent at foot young be killed as soon as possible after their mothers death, this qualifier is meaningless, because most young at foot escape and hide before this can be attempted. The large numbers of young at foot, orphaned by the annual cull, is confirmed by evidence given to ACAT in 2014 and by numerous eyewitness accounts.

Given that the KMP-17 claims that kangaroos are abundant in the ACT and the evidence that their populations have been drastically reduced elsewhere in their range, how is the ACT government working with Federal and State governments to assess the sustainability of eastern grey kangaroos in the wider region?

Regarding the maintenance of a sustainable kangaroo population in the ACT, other State governments have a markedly different approach. What attempts have been made to consult with other State governments to ensure the ACT government has a balanced approach and isn't on the way to eradicating eastern grey kangaroos?

Please advise details, evidence, data and methodology behind the government's claim that it is possible for a wild kangaroo population in the ACT to grow at a rate of 40% per year? (Please do not answer this question by referring to government publications that make the same unsupportable claim.)

If evidence-based management of the whole reserve ecology is the intention of the KMP-17, why has none been carried out or published, particularly as a baseline for environmental management?

Why, unlike the KMP-10, does the KMP-17 make no reference at all to 'adaptive management'?

A glaring omission in the ACT government's kangaroo management policies, is the lack of information/data available to the public, that demonstrates that any native flora or fauna, particularly endangered species as frequently referred to, are recovering in the Canberra Nature Park and surrounds since systematic kangaroo killing commenced in 2010. Also missing is appropriate scientific analysis of the reasons for such a recovery that might involve changed weather conditions and other variables. Can the ACT government comment on this?

No evidence is presented of any ecological studies into the impact of the wide scale annual killing on age and gender structures of populations, age at sexual maturity, changes in mating behaviour, and loss of learned knowledge passed down from mothers to their children. An aim of the KMP-10 is to maintain a sustainable kangaroo population in the Canberra Nature Park and the surrounds – how is this to be done?

Has any comparison been undertaken on the number of kangaroos, especially juvenile kangaroos, killed by car strike, during and immediately after the government's annual slaughter compared to other times of year?

The ACT government claims kangaroos are responsible for "serious motor vehicle collisions". Can the government provide details of these accidents? (In 2015, of the reportable motor vehicle accidents, only 174 incidents out of 15,358 involved 'animals'. Of these incidents only six people received injury and none required hospital treatment. *2015 ACT Road Crash Report*)

Have any autopsies on kangaroos killed during the government's cull (adults, juveniles, at-foot and pouch joeys) been conducted by the government since 2012 when a juvenile was found in the government's burial pit shot, stabbed and bludgeoned before dying of blood loss or suffocation?

On what basis has the ACT government ignored the expert advice of experienced wildlife, rescuers and carer on the matter of rescue, rehabilitation and release?

Having killed off the kangaroos, what is the impact of using fire and deploying livestock to reduce the excess herbage mass? On what basis does the government consider fire and livestock grazing (even over short periods of occupation) to be less damaging to native flora and fauna than their natural ecological manager - the kangaroo?

Why do Callum Brae and Jerrabomberra grasslands appear on the ACT government's Canberra Planned Development map as 'broadacre? How many more of our current nature reserves are going to be rezoned for future urban development?

What is the exact area of the extensions of Mulanggari and Gungaderra Nature Reserves, and what is the exact area of wildlife habitat (either public or private land) resumed for development (including future development) since the government's annual kangaroo slaughters started in 2010?

Over time the RFW have consistently shown the anomalies in the ACT government 'scientifically backed' KMP. The RFW urges the government to pause the killing of kangaroos until a wide-ranging, independent (i.e. not by a person or company that draws any of its income from either the ACT government or from supporting animal killing programs) scientific review is carried out. KMP-17 in its current form, and the proposal to adopt it as a legislative instrument, is unacceptable. Currently, there is every indication that the ACT government is killing off wildlife unnecessarily and so are not only causing incalculable animal suffering, but also damaging the very environment one wishes to protect.

Yours sincerely

Original signed by



The Regional Friends of Wildlife