

From: [Environment](#)

Subject: FW: Submission: Eastern Grey Kangaroo: Draft Controlled Native Species Management plan. Due 24 March 2017

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Attachments: [Submission to Environment_EGK Draft Controlled Native Species Management plan24_3_17.pdf](#)

To: Environment

Subject: Submission: Eastern Grey Kangaroo: Draft Controlled Native Species Management plan.
Due 24 March 2017

Hello there,

Please find attached submission regarding the above.

Could you please confirm receipt.

Thanks

I thank the ACT Government for the opportunity to provide comments on the draft **Eastern Grey Kangaroo: Draft Controlled Native Species Management Plan**. This proposal really concerns me, not only in regards to the ongoing senseless and needless annual slaughter of the Eastern Grey Kangaroo, but the fact the ACT Government would seek to reclassify the EKG to a 'controlled native species' in part to avoid and inhibit potential legal action by animal activists, and to avoid issuing valid licences for the killing season, that is a concern, not only as an activist, but as an ACT resident.

There is no doubt in my mind this plan will be adopted, irrespective of the feedback received. However it needs to be noted that the period of 6 weeks, whilst defined in the Nature Conservation Act 2014 does not permit the necessary time to substantiate the alternative scientific research that exists, to form part of the feedback that needs to be considered in such a submission.

162,266 Kangaroos have been slaughtered in the ACT since 1997, with 14,335 being killed in our reserves, since the ACT Government introduced culling in 2009. How is it that a native species, having been around in Australia for millions of years, all of a sudden requires a management plan? Whilst this plan acknowledges that *reducing kangaroo density doubled herbage mass on one reserve, it had no effect on exotic herbage mass, species count or ground cover*. Given the well worn propaganda that Kangaroos destroy ground cover that wouldn't seem to be supported by this document. Notwithstanding, the **greatest driver** of change **regardless** of treatment was the end of the drought conditions in 2009 and several years of good rainfall.

Although a staunch anti - cull advocate, I have been prepared to acknowledge the contents of the Kangaroo Management plan (2010), and I would hope that this draft plan does not unilaterally replace the 2010 ACT Kangaroo Management Plan. I argue the position that the change of the status of the Eastern Grey Kangaroo is absolutely unnecessary.

Eastern Grey Kangaroos do not have an unacceptable impact on the environment, and the previous culls have been undertaken whilst disregarding alternative, scientific, peer reviewed science that does exist.

It is expected that any study that seeks to support this draft plan, would reference and support a position that a cull is required. The summary of research (Table 4) leads one to a conclusion that Kangaroos in high density have a negative effect. This is just not the case, notwithstanding the fact there is no detail contained in how the research was conducted.

Appeals have been lodged with ACAT over the years, in part due to the counting methodology relied upon in coming up with appropriate sustainable figures on a per hectare basis. Whilst both parties are a fair way apart in terms of those sustainable numbers perhaps it might be beneficial to refer back to the 2013 ACAT findings, where counting methodology formed a key part of that particular tribunal hearing. The recommended kangaroo density figures as contained in Table 4 are significantly less than those contained within the Kangaroo management plan which ranges between 0.6 and 1.5.

Referring back to the ruling in July 2013, President Stefaniak stated that Dr Fletcher indicated that it 'is an ever evolving science and that he indicated that the 0.6 to 1.5 was **wrong**, but wrong in the extent that there was nothing that was better at this stage' Interestingly, coming to the actual decisions in that ruling, ACAT based their decision on the

upper limit of 1.5 roos per hectare as the figure to base a decision on.

There have been appeals against the issuing of licences, although ultimately unsuccessful in terms of a ban to the kill, there has been a delay. It should also be noted the inability of the Government to follow the rule of law, in terms of issuing itself valid licences from its own instruments was a reason for activists to carefully monitor the situation leading into the killing season.

To address the issues surrounding the annual issuing of a licence the ACT Government decided to issue a licence covering a period of two years (2015 and 2016) for a total of 5000 kangaroos. However this too was illegal, in a judgement handed down by Justice Michael Elkaim in overturning an animal activist conviction, he said if the licence was not valid, "it must follow that the cull itself was not lawful".

The ACT Government has long relied on its own evidence and science from its own employees to substantiate the annual kill, especially from ACT government senior ecologist Dr Don Fletcher .I refer back to the 2013 findings as it is most pertinent.

In 2013 Dr Fletcher was not put forward as an expert witness because, in the ACAT Code of Conduct, an expert witness is meant to be completely independent. Dr Fletcher whilst possessing significant academic qualifications, was acting for the ACT Government.

Senior Member Anforth in respect of Dr Fletcher's evidence, made the point there is a natural emotional tendency for people to want to support their own decision and people have that inclination to defend their own decision. It is very important for independency, people with relevant expertise can review the same data and review the same issues and come to different conclusions.

Anforth stated that 'if the ACT is called upon to defend administrative applications of this kind it would be better served having an independent expert who has standing at an academic national or international level who brings fresh eyes to the issue.

In 2014 the ACT Government sought an independent 'expert'. Karahaupo Consulting was engaged in 2014 to review Kangaroo population count methods and results.

The Kurahaupo Consulting review recommended 4 changes, namely

- i) direct and sweep counts need more replication
- ii) uncertainties in components of direct, sweep and pellet count methods should be addressed in analyses
- iii) a team of trained professionals (i.e. staff and/or contractors) should be the core for all counts, although we acknowledge the wider social and public relations benefits of including volunteers
- iv) the counts should be conducted as close as possible to the intended cull.

It is natural to form views based on perception. Looking at some of the other consulting jobs that Karahaupo has been engaged on, it is difficult to form any other view that these consultants are engaged where a government needs support on a control or eradication programme.

A quick view of some of their publications includes

- Managing NZ Mamallian populations as *pests*
- Early detection and rapid response to *invasive species* in Mexico
- *Eradication* of Feral cats

Parkes has also been quoted endorsing a company started by a professional hunter.

“Backcountry is the best, most professional supplier of ungulate control and eradication in the world “ John Parkes , Karahaupo Consulting

This draft plan also makes note of the ‘growing support’ for the ACT governments approach to killing Kangaroos based on a survey. This survey comprised 603 people, hardly an overwhelming endorsement from a population of 380,000, conducted three times since 2008.

Anyway the reclassifying of the Eastern Grey would result in no licence being required to undertake a cull, which would seem to contradict the provisions contained in the Nature Conservation Act 2014, which only allows the killing of native animals by the issuing of a licence.

The ACT Government has ***never, ever substantiated*** that the cull has materially impacted on the protection of the species it seeks to protect by undertaking an annual cull. The ACT Kangaroo Management Plan does not detail sufficient data on the positive or negative impacts of kangaroos on biodiversity, making it impossible to establish whether a cull of any sort makes the kind of difference the ACT government claims it does. Where is the empirical evidence that by killing our native kangaroos this has been achieved?

I think the conservation biologist, Dr Daniel Ramp has it right:

"The reason why kangaroos continue to be controversial in Canberra is because we haven't yet found a way of managing landscapes that treat wildlife with compassion and empathy, and that's what we need to do. And by continuing to purport this idea that killing solves problems is not going to resolve anything."

Regards

