

23 March 2017

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

By Email: environment@act.gov.au

Dear Sir/Madam,

*Draft ACT Kangaroo Management Plan (KMP)
and proposal for KMP to be made a 'controlled native species management plan'*

We appreciate the opportunity to comment on the draft ACT Kangaroo Management Plan 2017 (KMP) and the ACT government proposal to adopt it as a 'Controlled Native Species Management Plan'.

Animals Australia has very serious concerns in regard to the recent declaration of Eastern Grey Kangaroos as a 'Controlled Native Species', and with the content of the KMP itself. We strongly oppose the adoption of the KMP as a Controlled Native Species Management Plan, or as any kind of guide for kangaroo or environmental management in the ACT.

Any unremitting killing of wild native animals, nightly over several months, is distressing for those animals targeted and also for their entire mob. The kangaroos will be subjected to a high level of disturbance causing panic and distress, and social distress will occur amongst survivors whose mob and family structure are undermined. The effect on mob structure – the repeated disturbances and absence of mob members and loss of accumulated environmental knowledge of the mob – has to our knowledge never been studied, but is likely to be a significant effect on resilience. To undertake these continuing 'culls' without understanding these consequences is unacceptable.

The *Animal Welfare (Humane Shooting of Kangaroos and Wallabies) Code of Practice 2014*, which the ACT has adopted (contrary to the advice of its own AWAC) is mentioned in several places as though it affords credibility to the government's claims that the slaughter is humane. On the contrary, this Code still permits suffering of both pouch young and young at foot. The Code recommends and allows pouch young be killed by blunt force trauma or decapitation, and causes (by allowing the killing of females with young) young at foot to be orphaned – and so to die from either dehydration, exposure, myopathy, hunger, predation or car strike.

We have grave concerns with the implied claim that the killing is conducted during a season where there are fewer young at foot, and thus reduced issues for the young joeys in the mob. If the KMP is right in claiming that kangaroos are mainly born in summer (p11) then the only months when there are likely to be no young at foot are September-October, after the last of the older joeys are fully weaned and before the first of the younger joeys begin emerging from the pouch.

Animals Australia's principal concern is for the welfare of animals, but not just the kangaroos. Many other animals share kangaroo habitat and depend on kangaroos to influence that habitat in a way that maximises the diversity of the other species that share it. We are therefore concerned that the killing of large numbers of kangaroos each year is endangering these other animals and their habitat. We are interested in – but not convinced by - the research cited in the KMP that has convinced the ACT government that kangaroo grazing may be posing a threat to certain threatened species.

Furthermore, we are unfortunately very aware that often animal suffering or ethical considerations alone seems insufficient for decision-makers. On this basis, we will address the reasons why we consider that any reduction in the kangaroo population in the ACT remains unnecessary, and that other animals are more threatened by their removal than by their presence.

As with the 2010 Kangaroo Management Plan, we are not convinced by the science that has led the ACT government to the belief that kangaroos need to be killed in large numbers every year. The five authors whose eight papers (p16) apparently provide the scientific basis for this program represent a very narrow field of experience. Most of the papers are co-written by at least one other of the same five writers. Without comment on the value of these eight papers per se, they simply do not represent a sufficiently broad range of scientific research and opinion to be a credible basis for killing thousands of native animals, especially in the light of other available research.

Most of the papers cite ACT government documents in their bibliographies, suggesting that at least some of their reasoning may have been influenced by those partisan documents. One of the papers is co-written by the ACT ecologist. We maintain concern that the authors are not entirely independent of the ACT government.

Further, four of the writers are associated with the Fenner School at the ANU which has a long history of association with the 'pest' and other animal 'management' industries, rather than a broader ecological basis.

A wealth of other research regarding Eastern Grey Kangaroos, shows that they are slow breeders, late breeders, do not breed at all in times of severe food scarcity¹, and that they are subject to an extremely high infant mortality rate - primarily due to fox predation². In the ACT we would assume this rate would be even higher due to the high rate of roadkill.

We are persuaded by Arnold³ and Coulson⁴ that kangaroo populations grow at about 9 to 10 % per year until they stabilise in equilibrium with their environment. The KMP has provided no convincing evidence to refute this understanding nor to suggest that kangaroos should be kept at the suggested densities of about one per hectare. In fact, the KMP presents no convincing evidence that kangaroos densities should be kept at anything other than that attained by a stable population permitted to remain in equilibrium with its environment.

We are profoundly disappointed that the KMP would further entrench the ACT government's prohibition on hospitalising, rehabilitating and releasing kangaroos (p32), especially given the vast wealth of kangaroo carer experience in the region. This policy is not only cruel to the animals injured by motor vehicles, it is horribly cruel to the people who hit them with their cars, or find them injured, and have no means of lawfully rendering assistance.

We are similarly disappointed that the KMP would retain the ACT government's intransigent policy against relocating unwanted kangaroos (P34) even when local property owners are willing to take them. Again the government has access to a wealth of rescuer experience to assist with translocation, people who routinely translocate kangaroos, both humanely and successfully.

Further – it is ironic and deeply disturbing that, having reduced the kangaroo population to a level where other animals and their habitats are threatened by too much herbage, the government is now routinely bringing in sheep and cattle to reduce this herbage. Hard-hoofed domestic livestock are far more destructive to groundcover and all that lives in it than kangaroos which are naturally adapted to this environment.

Animals Australia has received reports that, in many places in the ACT where the government has removed kangaroo populations, the land where they lived and were killed has now been resumed for development: Googong, Lawson, the large solar farm on /Long Gully Road, as well as ongoing infill across many suburbs. We have learned that even declared nature reserves such as Callum Brae and Jerrabomberra grasslands are marked as ‘broadacre’ on the National Capital Authority Plan map⁵.

This program of urban infill and expansion persuades us that the ACT government is not genuinely concerned about the fate of threatened species living in these grasslands, as the KMP indicates. Rather, it suggests development opportunities as a likely reason why the government may wish to reduce or eliminate the kangaroo populations in these areas.

Animals Australia urges the ACT government to abandon both the 2010 and the 2017 KMPs. If there remains concern that kangaroos (rather than urban expansion or infill or climate change), are having some form of deleterious impact on threatened species, we urge you to engage independent researchers from a much wider range of institutions to undertake a comprehensive study of this matter.

In the unlikely event that such a full and independent study did conclude that, because of the many human impacts on the local environment, kangaroos in the ACT do pose a threat to other species in some urban reserves, we would support only humane and non-lethal measures, such as translocation and fertility control, to reduce their population. We maintain that where humans are responsible for the problem, animals should not be caused further suffering due to that problem.

On a related matter, we note that the bodies of shot kangaroos are being to use to make baits for wild dogs and foxes (p56). Animals Australia is totally opposed to the use of inhumane poisons to control unwanted animals, and we are especially opposed to the use of 1080 against dogs and foxes because of the excruciating pain and distress this poison causes to canids. We also note that there is no evidence that killing fast-breeding animals (such as dogs and foxes), short of total eradication, has ever reduced a population of unwanted animals in the long term.

Animals Australia rejects the KMP 2017 on the basis of the arguments provided above, and urges that it not be given legal status as a ‘Controlled Native Species Management Plan’.

Yours sincerely,



Chief Executive Officer

References

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4. Coulson, G, Alviano, P, Ramp, D, Way S, 1999 The Kangaroos of Yean Yan, history of a problem population , in *Proceedings of the Royal Society of Victoria* 111(1), 121-130
5. National Capital Authority, *2015 National Capital Plan*, 2015 at: https://www.nationalcapital.gov.au/downloads/Planning_and_Urban_Design/NCP/National%20Capital%20Plan%20Draft%20Amendment%2086%20-%20Revised%20National%20Capital%20Plan.pdf