



ACT Kangaroo Management 2017
Submission from the Animal Justice Party of the ACT

Changes to instruments

The Animal Justice Party of the ACT opposes the government's devious demotion of a keystone native species, on which the survival of so many other species depends, from a 'protected' animal to a 'controlled' animal, allowing its officers to kill irreplaceable native animals at its own whim.

We also oppose the use of the new Kangaroo Management Plan as a controlled animal management plan because kangaroos should not be a controlled animal. They are, in fact, a species desperately in need of protection, as are many of the threatened species (listed and unlisted) that depend on them for their survival.

We oppose both the 'conservation culling' calculator and the rural 'culling' calculator because killing kangaroos is cruel to kangaroos and also because it harms both the environment and the other animals who depend on kangaroos (at natural densities) for their survival and well-being (see our submission on the KMP below).

Submission regarding the 2017 ACT Kangaroo Management Plan (KMP)

1. Summary of Key Points

The Animal Justice Party of the ACT (AJP) rejects outright the KMP's assertion that kangaroos have a deleterious impact on the environment because the KMP's scientific foundation for this assertion is:

- non-existent, not unequivocal, or otherwise misrepresented;
- draws on the work of only five closely associated authors; and/or.
- not demonstrably independent of ACT government influence and other pro-killing influences.

None of the credible scientific evidence available, many of which are also quoted in the KMP, supports the assertion that kangaroos have a deleterious impact on the environment.

The AJP rejects totally the KMP assertion that the government's kangaroo killing program is humane because:

- the slaughter is (where shooters comply) conducted in accordance with a Code or Practice which permits horrific cruelty; and
- the killing season which the government claims reduces the number of orphaned young at foot does nothing of the sort.



AJP remains disgusted with the KMP's continued refusal to allow qualified carers to hospitalise, rehabilitate and release injured and orphaned kangaroos. This is an utterly barbaric way to treat both the animals who have been injured, and the humans traumatised because (a) they have caused their suffering and (b) they find out the kangaroo will not be saved.

We are similarly disgusted by the KMP's rejection of the very real option of translocating allegedly excess kangaroos to properties in nearby NSW that are more than willing to take them.

See the key points below for more detail on these issues.

2. AJP recommendations

To redress the environmental issues resulting from the European settlement of Australia, the AJP recommends the following.

- No further slaughter of kangaroos, for any recreational, alleged 'management', or commercially driven reason should take place in the ACT.
- No further urban expansion or infill should be permitted to intrude into wildlife habitat in the ACT.
- Sheep and cattle farming in the ACT should be gradually replaced with more humane, environmentally friendly and economically viable rural industries such as vegetable crops and forest plantations.
- If kangaroos are to be displaced due to urban development, or are considered excess to desirable numbers on rural or reserve land, they should be translocated - using the vast wealth of expertise and experience available among kangaroo carers - to properties that are willing to take them (in either ACT or NSW).
- The ACT government's current prohibition preventing qualified carers from rehabilitating and releasing kangaroos is barbarically cruel to both humans and animals. It must be withdrawn.
- To reduce kangaroo road deaths and injury, emotional trauma to drivers, and damage to motor vehicles, wildlife corridors should be built linking all reserves and other wildlife habitat with underpasses and overpasses to allow safe passage for kangaroos and other animals throughout their range. All roads that bisect wildlife habitat should be fenced to prevent animals crossing anywhere else. In the meantime, speed limits in wildlife hotspots should be reduced and enforced, and speed cameras and traffic calming devices installed. Driver wildlife education should be a priority and incorporated in driving competence tests.
- The value of fully protected urban kangaroos to the ACT's tourist industry must be recognised and the industry developed accordingly.
- Since bushfires and extended droughts are occurring due to human activity (locally and globally), feed and water relief for hungry wildlife, including kangaroos, should be adopted and provided as a matter of government policy.
- Captive kangaroos, or groups of kangaroos inadvertently confined by urban development, must be managed exclusively by translocation and/or fertility control.

- If the ACT government continues to persist with the myth that kangaroo numbers need to be reduced, their numbers should be reduced exclusively by fertility control. Even though in our view fertility control would be just another road to extinction for this species, it is at least a kinder road.

3. Key point 1: No credible evidence of environmental impacts

AJP disputes the implication that the 400 references cited in the KMPs of 2010 and 2017 (p6) ‘underpin’ the KMP’s program of killing kangaroos.

Only ‘eight papers’ of these references are cited as supporting the KMP’s assertion that kangaroos have any deleterious impact on the environment. The KMP’s assertions based on this tiny cluster of papers are not credible because:

- the KMP reports their findings inaccurately - for example Dimond 2012 does not even mention kangaroos in relation to the decline of the earless dragon; and/or
- the papers themselves cite scientifically unsupported ACT government policy documents (including the 2010 KMP) as the source of their assertions regarding kangaroo densities and kangaroos causing environmental damage; and/or
- they are not, in fact, independent because they are co-written by ACT government officers; and/or
- they are not, in fact, independent because the authors acknowledge support from the ACT government or its officers; and/or
- they are not, in fact, independent because the authors are associated with organisations that (presumably) receive some form of funding from the ACT government; and/or
- they are not, in fact, independent because the authors are associated with organisations that receive funding from animal killing industries; and/or
- all the authors and their co-writers represent an extremely narrow range of scientific experience.

One of the authors, in fact the author of no less than three of the ‘eight papers’, admits that he was an employee of the ACT government’s Conservation, Planning and Research Unit. Two of the papers were actually co-written by the ACT government’s Chief Ecologist.

An examination of the KMP bibliography reveals a tangled web of five authors and eight papers which represents an extremely narrow experience pool. Most of the papers cited are co-written amongst the same five authors. One other name, not cited as primary author of any of the eight, appears as co-author of six of the eight papers. Another name is co-author of four, two more names are co-authors of three. Therefore the KMP is basing its entire case for killing kangaroos on the work of a single small group of collaborating authors.

As well as the government employees, these authors and co-authors come from a tight group of related ACT research institutions, the Fenner School at ANU, CSIRO and the Institute of Applied Ecology (IAE) at Canberra University. Four of the five authors are associated with the Fenner School (ANU), which is especially well-known for its association with killing ‘pest’ animals – our



reason for doubting an author's total independence from the animal killing industries. The Fenner School and the IAE, one assumes, would also receive some sponsorship (in the form of scholarships, partnerships, consultancies) from the ACT government, another reason why we consider that these authors cannot be regarded as truly independent.

Even without the questions about their independence, this is far too narrow a range of expertise for the KMP to cite their views as justification for the annual unnatural massacre of thousands of native animals, and the suffering it inflicts on those animals.

The ACT government went slightly farther afield to obtain a review of its slaughter program by engaging Kurahaupo Consulting (Parkes and Forsyth 2014). However, Kurahaupo Consulting appears to be a company which provides consultancy services to people who want to kill animals, so it is even further from independent than the six authors on whose work the KMP bases its contention that kangaroos need to be controlled. In any case, Kurahaupo Consulting paper was thoroughly demolished in a review by a respected and entirely independent retired CSIRO plant scientist, Dr William Taylor at ACAT 2014¹.

The KMP makes (with no citation except to a government propaganda sheet) the biologically impossible assertion (p26) that kangaroo population growth rates in the ACT have been recorded at 40% per year, necessitating a slaughter of 30% of a population every year. Because kangaroos are late and slow breeding animals, and because of extremely high levels of infant mortality largely due to predation², wild kangaroo populations cannot grow faster than about 9-10% per year^{2,3}. A 30% per year slaughter is therefore a guaranteed road to extinction. In fact, it is now well established that when a kangaroo population reaches a size and density that is in equilibrium with the environment, it stabilises, varying as the environmental conditions vary^{3,4}.

We note the KMP's assertion (p26) that 'a great reduction in food supply had little effect on kangaroo density'. In fact, Eastern Grey Kangaroos do not breed at all during times of high food stress⁵. It is certainly likely that Eastern Grey Kangaroos in temperate zones, where severe lack of feed is rare, are less likely to need to suspend reproduction than EGKs in areas where food availability is more variable. However, to suggest that the local kangaroos do not have the same biological response to severe food stress (ie to suspend sperm formation and conception) as EGKs everywhere else is tantamount to suggesting the local kangaroos have formed their own new species. Notably the only citation for this assertion is the "Chief Ecologist" - an employee of a government which supports slaughtering thousands of kangaroos every year.

The KMP states (p46) that 'current knowledge indicates that a density of approximately one kangaroo per hectare in grassland is likely to provide the desired conservation environment.' At ACAT 2013, the ACT government's "Chief Ecologist" and spokesperson admitted that this assertion that one kangaroo per hectare is desirable is 'wrong'⁶. It is certainly not 'current knowledge'. There is no scientific basis for it. What 'common knowledge' indicates is, in fact, that even at the time when the annual slaughter began, kangaroo populations were already well below any numbers which could potentially exert heavy grazing pressure on the affected landscapes. Even the government's reported densities in the reserves, in 2013, of 0.45 to 2.08 per hectare, are equivalent to only 0.18-0.832 DSE per hectare⁷.

The KMP considers that kangaroos are ‘abundant locally’ (p10). In fact, even if kangaroos were abundant in the ACT prior to the commencement of the ACT government’s annual slaughter (when Coulson 2008 made this cited assertion), they were certainly not abundant anywhere else in their former range. In NSW their numbers are estimated to have dropped from 138 million in 1978 to 14.6 million in 2010⁸. Furthermore after 8 years of repeated season-long slaughter in the ACT (at up to 40% per year recommended by 2010 KMP p135) of a species that cannot grow faster than 10% a year^{2,3}, they are now, no longer abundant locally.

It is extremely significant that not one of the National Recovery Plans for threatened species mentions kangaroo grazing as one of the threats facing any of these species.

On this basis AJP rejects all the contentions, assertions, assumptions and conclusions in the KMP that are based on this flawed premise that kangaroos are at high densities and are therefore causing deleterious environmental impacts (pp12-25). Consequently we reject all of the following:

- kangaroo populations need to be managed (p36);
- the ACT government slaughter is a conservation cull (p44);
- killing kangaroos *en masse* (p36) is desirable;
- shooting them is the best option;
- desirable grassland target densities (p46) can be anything other than the natural densities kangaroo populations will achieve and maintain if they are left alone.

4. Key point 2: Clear evidence that the slaughter is not humane

AJP rejects the repeated assertions that the ACT government’s kangaroos slaughter is humane.

The relevant Code of Practice⁹ to which the KMP frequently refers (pp5, 6, 29, 30, 31, 32, 35, 36, 38, 43, 53 and 55) is anything but humane, even if shooters always complied with it. It allows the following cruelties:

- pouch joeys, in very large numbers, to be bludgeoned to death (p9, p14);
- at-foot joeys, in very large numbers, to be orphaned and abandoned to die of hypothermia, dehydration, starvation, myopathy, fox predation and car strike (p9);
- mob structure to be destroyed and survivors kept in a state of unremitting terror.

The only function of a Code of Practice under ACT law¹⁰ is to provide an exemption for acts of cruelty that comply with a formally adopted code of practice. Codes do not exist to prevent cruelty, they exist to legitimise cruelty that is perceived to be the *status quo*. The National (model) Code was developed without consideration of the specific needs of the ACT. We note that it was adopted in the ACT despite the fact that the ACT Animal Welfare Advisory Committee (AWAC) had expended considerable public resources developing an ACT-specific Code which would have provided no exemption from prosecution for the killing of females with young.

We further note that, the government's slaughtering season is a nonsense. We have no basis for disputing the KMP's assertions about the age at which kangaroos first leave the pouch and the age at which they are fully weaned. This information concurs closely enough with numerous independent studies. However, if the KMP is correct about most kangaroos being born during summer, the age at which they first leave the pouch and the age at which they are fully weaned (p11) then the ACT government has set its annual slaughtering season at the wrong time of year. September through October, not March through July, would be the only window between the weaning of the last of the older (18 month old) at-foot joeys and the emergence of first of the (eleven month old) younger at-foot joey.

The mass orphaning of at-foot young by the ACT government's slaughter was admitted by its own witness, Dr George Wilson at ACAT 2014¹¹ and is corroborated by numerous eye witness accounts.

The ACT government claims that this earlier killing season is humane because it reduces the number of orphaned young at foot that need more milk. We note that this only means the younger orphaned young at foot will die sooner than the (still unweaned) older young at foot.

5. Key point 3: Wildlife carers and translocation

We totally reject the ACT government policy and KMP recommendations regarding the keeping of kangaroos by wildlife carers (p32) and the translocation (p34) of kangaroos.

Had the ACT government consulted any of the many hundreds of experienced kangaroo rescuers or carers on this matter, they would know that humane and successful rescue, rehabilitation and release, including translocation, of kangaroos is carried out every day throughout the entire range of Eastern Grey Kangaroos.

All this policy of prohibiting wildlife carers from rehabilitating kangaroos does is force good, responsible people to break the law, while causing life-long nightmares to people who call for government assistance from a ranger for an injured kangaroo, only to learn that animal will be killed without any attempt being made to save it. Aside from the cruelty to the animal, the social impact of this prohibition is incalculable.

The dismissal of translocation, given that it can be used and routinely is used, humanely and successfully, reads like nothing more than yet another measure to ensure that the cruel slaughter of thousands of kangaroos can continue either in perpetuity or until the species is extinct. The government's position on translocation is even more preposterous when you consider that the current translocation of 300 kangaroos at Mt Panorama is strongly supported by the Bathurst Council¹².

AJP dismisses the recommendations (p33) of the Kangaroo Advisory Committee on the grounds that:

- no explanation of this group's composition, expertise or independence is provided;
- no welfare expertise was included in this committee, and its conclusions were never referred to the AWAC;

- it is inconceivable (given its recommendations) that any kangaroo carer expertise could have been included in this committee.

6. Other matters where the KMP has got wrong

Opinion surveys

AJP disputes the KMP's claim (p 5) that any of the government's public opinion surveys on kangaroo killing can be construed as indicating public support for mass kangaroo killing. A number of serious flaws were found in the 2014 survey:

- The survey was paid for by TAMS which scarcely recommends it as a credible document.
- The document does not say how residents were selected or whether it was conducted from a random sample.
- The way the questions are phrased makes it impossible for many reasonable people not to feel they should support a 'cull'. If the killing really were to prevent starvation during times of drought (which it never has been), or to conserve grassland and woodland animals (when in fact it is doing the opposite), many reasonable people would feel they had to say they agreed with it.

Habitat added vis-à-vis habitat taken away

AJP would like to see a precise comparison of the area added to the Canberra Nature Park at Mulanggari and Gungaharra Nature Reserves (p6) with the area of other leased and unleased, reserve and non-reserve wildlife habitat lost due to development over the same period, or scheduled for future development.

Purpose and goals

AJP notes that, since there is no credible science supporting the notion that kangaroos have a deleterious impact on the environment, neither the KMP itself (p7) nor the annual slaughter (p45) has any hope or pathway to achieving its stated purpose, or goals (p29).

Removing kangaroos is destroying fragile habitat

The KMP states that "some threatened grassland plant and animal species are now restricted to only one or a few scattered populations and are highly vulnerable to adverse changes in their habitat" (p7).

AJP agrees with this statement but considers that many of these adverse habitat changes are occurring and will continue to occur as a result of the steady depletion in kangaroo numbers due the ACT government's annual slaughter policy. Most grassland species rely on kangaroo grazing to control and maintain the diversity of herbage they need to survive.

For example, contrary to the assertions of the KMP (which are not even supported by its own citation to Dimond), the earless dragon needs the mix of low herbage and small bare patches¹³ which is

maintained by kangaroos. The earless dragons have recovered and are thriving in the Queanbeyan Nature Reserve which adjoins the most easterly reserve of the Canberra Nature Park; but neither the mass kangaroo slaughters, as conducted in the ACT, nor actual culling has ever occurred there¹⁴.

Animal protection campaigns

The KMP asserts (p8) that there are no animal rights campaigns on behalf of small grassland species, only kangaroos. In fact, all campaigns to protect kangaroos are also, by definition, campaigns to protect the other grassland species that depend on kangaroos for their survival.

Key features of biology and ecology

In addition to our dismissal of the ACT government's Chief Ecologist assertion that local EGKs do not share the otherwise universal EGK attribute of suspending reproduction during times of extreme food stress, the AJP also questions the assertions (p11) about the small extent of kangaroos home ranges. Extent of home range itself will (as with all other animals) vary considerably with the availability of food and water. The distances suggested in the KMP look more like minimum than maximum EGK home ranges.

Additionally, life-long anecdotal evidence of Canberra and Queanbeyan residents suggests that young males routinely leave their original home range permanently, in search of new territory and mates. Most of the lone males found killed on the roadsides or grazing in suburban lawns are (or were) on that journey.

Additionally, kangaroos will flee their home range for many kilometres when chased by predators or shot at by humans in vehicles, though they will try to return to their home range (across roads and other dangers) when the original threat has passed.

Kangaroos themselves are a threatened species

AJP notes that kangaroos themselves are one of the species suffering most keenly from alienation, fragmentation, degradation of habitat and lack of recolonization following disturbance (p14). As mentioned above their numbers have dropped by almost an order of magnitude (140 million to 15 million) since European settlement⁷. Indeed, if it were not for the many commercial interests vested in killing them, we consider that Eastern Grey Kangaroos would already be listed as a threatened species. The KMP figures (p54) showing a sevenfold increase in kangaroos permitted to be shot on ACT farms between 1997 and 2010 indicates clearly that the government's killing is not about reducing densities; it is an all-out extermination campaign.

Additionally, since kangaroos are a keystone species on which most other threatened grassland species depend for their survival and well-being, the extreme and ongoing reduction/extermination of kangaroo poses yet another threat to these already threatened species.

Economic issues

On economic matters (p25), as mentioned above, AJP recommends an end to the destruction of wildlife habitat for urban expansion and infill, and a phase-out of ACT sheep and cattle farms in favour of more humane, environmentally sustainable and economically viable rural industries which incorporate kangaroos to maintain their natural land management functions. Without competition from sheep and cattle it is unlikely there would be any economic cost resulting from kangaroos grazing on rural land. They do not eat vegetable crops and they do not eat plantation forestry (either hardwood or softwood).

In relation to government horse paddocks (pp9, 26 and 55-56), we note that it is not too many kangaroos who damage these paddocks but the reduction in the size of leased land to agist horses. This woeful situation has led to too many horses for the size of the paddocks. The AJP notes the recent solar farm development along Long Gully Road in Hume as just one example of the government's greenfield projects that has impacted on the size of the Rose Cottage Horse Paddocks. Alternatively, horse densities should be reduced to levels that allow kangaroos to continue to co-exist with horses in these pastures at natural kangaroo densities.

The economic issue of motor vehicle collisions with kangaroos is dealt with in our Recommendations (above).

The KMP does not even mention, let alone attempt to analyse the opportunity costs lost, in terms of kangaroo tourism, due to the annual slaughter and the high kangaroo road toll.

Nor does the KMP acknowledge the short-term financial advantage for the government of swallowing up wildlife habitat for further urban development (including infill), including (apparently, at least two currently designated reserves which appear in the National Capital Authority map as 'broadacre'¹⁵. Developed land, of course, brings in much higher rates than undeveloped land. The AJP concludes that this is the real motive behind the kangaroo extermination campaign.

Social issues

Our recommendations above deal with the social impact (p25) of kangaroos deaths due to vehicle collisions (pp27-28, 58). As noted above, the KMP does not even mention the enormous human cost of prohibiting people from helping kangaroos they hit with their cars or find injured on the road.

The KMP also omits to mention the huge human cost in distress, grief, trauma and post-traumatic stress syndrome (PTSS) caused by its annual kangaroo massacre. The government, its politicians and bureaucrats, must surely realise that they ignore this appalling human cost at their own (political and professional) peril. Many a Canberran who lives near a reserve has contacted the AJP in absolute distress pleading with us to take action to make the shooting stop.

Evidence-based management

We fully support evidence-based management (p30), but note that none seems to have occurred in the ACT. We also note that, unlike KMP 2010 which promised adaptive management, KMP 2017 makes no reference at all to adaptive management.

We assume this is because no adaptive management actually occurred between 2010 and 2017. This is not surprising since no attempt seems to have been made to monitor the impacts (or benefits, should any actually occur) of reducing kangaroo numbers since the annual slaughter commenced.

Without any evidence to determine whether the killing program is succeeding or, as we argue, an environmental disaster, how can management practices be adapted in the light no evidence?

Illegal killing of kangaroos

We are concerned that, despite the KMP's lip service to preventing the illegal killing of kangaroos, the ACT government has not succeeded in preventing illegal killing (p31) in the past. For example:

- ACT government rangers allowed government shooters to kill kangaroos on the Rose Cottage Horse Paddocks near the Centenary Trail while there was no licence in place for shooting on that particular (very large) area of the paddocks¹⁶.
- ACT government rangers, further, allowed government and private shooters to kill kangaroos throughout 2015 (and quite likely ever since 2010) under an invalid licence¹⁷.
- ACT government rangers even allowed shooting to continue for ten weeks after the licence under which the shooting was permitted was found by the Court to be invalid¹⁷.
- It has since emerged that ACT government shooters have illegally used silencers when killing kangaroos¹⁸.
- In 2015, many witnesses claim that the government permitted shooting to occur within metres of passing traffic.
- In 2008, all the kangaroos killed at the Belconnen Naval Transmission Station were killed illegally. At that time, the ACT Code or Practice¹⁹ (as distinct from the Code now in place⁸) provided no defence or exemption for the cruelty of driving and trapping kangaroos in a small corral.

Captive populations

Captive populations (p42), can be readily managed by fertility control. If a population is protected from predators and other major causes of kangaroo mortality, the population has the potential to overpopulate the carrying capacity of its space. (There is no reliable evidence that this ever occurs with free-living wild populations.)

Captive populations should be managed exclusively by fertility control. Captive kangaroos become trusting of humans and such trust must never be betrayed.

Herbage mass removal

AJP considers it highly irresponsible that sheep and cattle are being used as a short term alternative to kangaroo grazing for herbage mass removal (p47). Because of their different teeth arrangement²⁰, indiscriminate browsing habits, hard hooves, heavy bodies and much higher water consumption, sheep and cattle damage fragile and vulnerable native habitat very quickly²¹, whereas kangaroos appear to have done no demonstrated damage to their habitat in around 15 million years.

Removing herbage mass would not be necessary at all if kangaroos were not being slaughtered and thereby prevented from managing excess herbage mass themselves.

Environmental modification

It is environmental modification (including large scale kangaroo extermination) that has caused all the problems the KMP claims to be aiming to redress. We reject all further modification to kangaroo habitat.

Commercial slaughter

We are thankful for the one small mercy that the ACT still has no plans to participate in Australia's commercial (p56-57) kangaroo slaughter.

Use of carcasses for poison baits for foxes and wild dogs

We utterly oppose the use of kangaroo corpses (or any other dead animal) to make 1080 baits for wild dogs and foxes on the grounds that:

- the poison used is 1080 which causes excruciatingly pain to dogs and foxes²²; and
- killing fast-breeding animals (by any method that does not achieve immediate eradication of every member of the population) always ensures an increase in their population in the short term and a return to the pre-killing population in the long-term²³.

Yours sincerely


Secretary
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