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Manager
Conservation Research, Environment, Planning and Sustainable Development Directorate
PO Box 158
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By email to: environment@act.gov.au

24 March 2017

Dear Manager,

I write today on behalf of Humane Society International's (HSI) 65,000 Australian supporters to comment on the ACT's *Eastern Grey Kangaroo: Controlled Native Species Management Plan*. As a global organisation which campaigns for both animal welfare and habitat conservation, HSI is particularly well placed to assess and provide input to this plan.

HSI disagrees with the government's declaration of eastern grey kangaroos as a 'controlled native animal'. We also oppose the use of the 2017 Kangaroo Management Plan (KMP) as a 'controlled animal management plan' because the KMP has in our view not convincingly argued that eastern grey kangaroos should be a controlled animal, nor that the methods of killing them are humane.

HSI is in disagreement with the KMP on two overarching grounds:

- its assertions regarding kangaroos damaging the environment; and
- the presented view that kangaroo killing in the ACT is a humane practice.

The following points are of particular concern to HSI:

- the narrow pool of experience from which the KMP has drawn the research on which it has based its case that kangaroo numbers need to be reduced;
- the assertion that kangaroos populations in the ACT have grown at a rate of 40% per year;
- the bludgeoning to death of pouch joeys and mass orphaning of young at foot;
- the destruction of mob structure and the distress and trauma caused to the animals by shooting night after night, for several months continuously, year after year;
- the ACT government's prohibition against qualified wildlife carers hospitalising, rehabilitating and releasing injured and orphaned kangaroos;
- the government's failure to undertake adequate monitoring, evaluation and adaptive management of its culling program to determine whether it is achieving the desired results;
- the ACT government's refusal to allow translocation of kangaroos, especially where there are property owners ready to welcome kangaroos, and wildlife carers with the skills and experience willing and able to assist the government in the process;
- the failure to implement fertility control as an alternative to shooting;
- the decrease in open space available to kangaroos and other wildlife as a result of the ACT government's program of urban expansion and infill;
- the use of livestock grazing to reduce excess herbage caused by kangaroo removal; and
- the use of shot kangaroos to make 1080 baits for foxes and 'wild dogs'

The KMP claims that it is supported and underpinned by 400 references. The vast majority of these references appear to confirm HSI's understanding that kangaroos (like native grazers in other parts of the world) play a critical role in maintaining and engineering an environment to maximise

opportunities for a wide diversity of other species to share it.

The ACT government's entire premise for killing kangaroos in vast numbers seems to be that human impacts in the ACT have increased the number of kangaroos to a point where their grazing now limits opportunities for other species, including some threatened species, that share their habitat. We find this unconvincing because kangaroo numbers have dropped dramatically throughout their range since European arrival in Australia. The unremitting slaughter to which kangaroos have been subjected has depleted this species across its range significantly.

Having claimed to be underpinned by over 400 references, the KMP then goes on to explain that just eight of these papers (by five authors) support the contention that kangaroos are having deleterious environmental impacts. HSI is concerned that in some cases the KMP misrepresents the content of these papers. For example, the paper by Dimond does not mention kangaroos. HSI notes that five of these eight papers cite ACT government assertions as their own authority for some statements, leading to the KMP's use of these papers being circular and inappropriate.

We are surprised by the KMP's assertion that kangaroo population growth rates in the ACT have been recorded at 40% per year, justifying a slaughter of 30% of a population annually. Wild kangaroo populations subject to normal predation regimes typically don't grow faster than 10% per year, and a culling quota of 30% of the total population is highly unsustainable.

It is well established that kangaroo populations will rise at this rate before stabilising in equilibrium with its environment. Eastern grey kangaroos are also known to suspend conception and sperm production when food is scarce. This suggests that the level at which a kangaroo population stabilises can quickly adjust to variability of food supply, without anything near the sudden die-offs experienced by animals that do not stop breeding until they are much closer to death.

The claim that 'current knowledge indicates that a density of approximately one kangaroo per hectare in grassland is likely to provide the desired conservation environment' is questionable. The ACT government's own Chief Ecologist and spokesperson has admitted that this figure is incorrect and certainly not 'current knowledge'.

HSI rejects the repeated assertions that the ACT government's kangaroo slaughter is humane. We consider it egregious of the KMP authors to claim, on the grounds that shooters are required to comply with a Code of Practice, that the slaughter is humane. The relevant *Code of Practice for the Humane (Non-Commercial) Killing of Kangaroos* (CoP) is inherently inhumane. It requires the bashing to death of pouch young, permits orphaning of young at foot by allowing their mothers to be shot, and requires only that shooters kill those young at foot 'as soon as possible'. It permits high levels of terror, trauma and loss of mob integrity and structure to the survivors, year after year.

A recent Commonwealth government paper, *Improving the humaneness of commercial kangaroo harvesting*, confirms that inherent cruelty of largescale kangaroo slaughters, comparing the bashing to death of joeys to the similar slaughter of baby harp seals for the fur industry. Orphaning of a 'ghost population' of young at foot through the ACT government slaughter was admitted under cross-examination by Dr George Wilson at ACAT 2014. HSI understands that there are many anecdotal accounts corroborating this evidence.

In conclusion, the KMP has not provided a plausible case for reducing kangaroo numbers in the ACT. However, even if it had done so, the proposal to achieve this reduction by a slaughter which is indisputably cruel to animals is unacceptable. HSI recommends that the ACT government determine from an appropriately wide and independent body of research whether there is adequate evidence that kangaroo numbers in the ACT have increased due to human impacts, and whether this increase is proving detrimental to other species.

If you require any further information please don't hesitate to contact me on 1800 333 737.



Senior Program Manager