

22 March 2017

Environment Division  
PO Box 521  
Canberra ACT 2601

Submitted via email to [environment@act.gov.au](mailto:environment@act.gov.au)

Dear Sir/Madam

**ACT Eastern Grey Kangaroo Draft Controlling Declared Native Species Management Plan**

Thank you for the opportunity to comment on the draft of the ACT Eastern Grey Kangaroo Draft Controlling Declared Native Species Management Plan. This letter and accompanying comments represent a joint submission from RSPCA Australia and RSPCA ACT.

Whilst the RSPCA acknowledges the need to control kangaroo populations, it is essential that this is justified, humane and effective.

With regard to animal welfare, it is essential that all landholders are assessed to be competent to humanely shoot kangaroos before being permitted to undertake control activities. Although this requirement is not currently included in the Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Non-Commercial Purposes (CoP), jurisdictions can implement such a requirement and are well placed to advocate for this inclusion in the CoP.

We also strongly recommend that an independent assessment be conducted to evaluate welfare aspects of the management plan, especially with regard to 'on-the-ground' shooting practices.

Thank you for considering our comments. Please do not hesitate to contact our office should you wish to discuss any of these matters further.

Yours sincerely



Chief Science and Strategy Officer  
RSPCA Australia

RSPCA Australia

ABN 99 668 654 249  
ACN 163 614 668

P 02 6282 8300  
F 02 6282 8311  
E [rspca@rspca.org.au](mailto:rspca@rspca.org.au)  
W [rspca.org.au](http://rspca.org.au)

PO Box 265  
Deakin West ACT 2600



## RSPCA Australia and RSPCA ACT Comments

### ACT Eastern Grey Kangaroo Draft Controlling Declared Native Species Management Plan

#### General comment:

Overall, the draft plan is fairly comprehensive.

The term 'euthanasia' is not appropriate when referring to the humane killing of animals as part of a culling process. Euthanasia refers to the humane killing of an animal who is suffering pain, or an intractable condition. Recommend only using the term 'euthanasia' when describing the humane killing of animals who are injured and/or in pain and that it not be used for all other circumstances relating to culling, including the humane killing of orphan dependent joeys.

#### Specific Comments:

Page 13, Table 3	Acknowledges that housing development has had significant impact on reducing native grasslands by 95% - therefore how can eastern grey kangaroos (EGKs) be implicated to the point they must be culled, when the greatest impact has been humans; also what is being done to rectify this in terms of replanting natural grass lands and preventing development in significant grass lands.
Page 15, Table 4	Refers to 8 studies which support the 2010 plan but also identifies that some areas for potential improvement or adjustment. However, no details are given.
Page 19	Mentions that some reserves have limited stock grazing for fuel load reduction and other management objectives - suggest that if kangaroos are known to inhabit an area then there should be no grazing of livestock in these reserves.
Page 21 Table 5	The table lists 9 bird, reptile and insect species which are threatened due to heavy grazing by EGKs but no mention of the predation impact of feral cats especially for reptiles and two species of birds.
Page 22-23 Table 6	The table lists 9 plant species under threat but not all are due to heavy grazing by EGKs; for 6/9 species, there is no evidence that EGKs are having a direct impact; only 1/9 is impacted by heavy grazing, not just EGKs but livestock and rabbits too.
Page 24 and 54	Rural landholders may apply for an authorisation to legally shoot kangaroos in order to reduce their impact on rural production. A vital aspect of animal welfare is justification for culling but this is not mentioned; to gain social acceptance of killing kangaroos, it is essential that rural landowners are required to provide specific information in terms of population densities and their impact (nature and severity) to demonstrate that culling is justified; in response to this, details regarding the calculated optimum number of kangaroos to be killed must be provided as part of the licence to enable a high probability of an effective cull, i.e. will significantly reduce and/or eliminate the impact. Landholders applying for a permit must report the number killed and provide an assessment of the impact of the cull.
Page 25, 3.9.2	States that a horse paddock complex had to close due to competition from kangaroos and another has reduced from 80 to 20 horses in a 14 year period but no specific scientific references for this so concerned this may not be accurate, as there may be other factors contributing to closure.

Page 30	This is good - kangaroo movement behaviour, dart delivery of fertility control, population dynamics and ecological effects of kangaroos on endangered ecological communities. Such research is intended to provide a solid scientific foundation for future management policy.
Page 30, 4.3.1 (c)	<p>States that culling requires a special shooter’s permit which includes a marksman test every 2 years and tests on the National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Non-Commercial Purposes (COP), as well as macropod identification - should be explicit to state that landholders who undertake their own shooting must also obtain a special shooter’s permit and undergo the same requirements as stated but this is not clear (see 6.1 Kangaroo management on rural lands - this is also not clear). Unless a landholder has undergone the requirements to obtain a shooter’s permit, it should be an offence to shoot kangaroos.</p> <p>Also states that females can only be culled during March to July (to minimise shooters encountering dependent young a foot) but there is no mention of seasonal conditions which no doubt would have a significant influence on breeding patterns. The aim is to minimise orphaned dependent young; this is commendable but there are no references cited supporting this policy - this needs monitoring and data collection in terms of the numbers of dependent young and what action is taken by shooters to euthanase the young.</p> <p>The plan refers to the code as stating that ‘Where young are present, the code of practice states that pouch young and young-at-foot should be humanely killed immediately. However, where young are present, would it not be advisable that shooting females should cease immediately as the objective to avoid this has not been achieved.</p> <p>As per McLeod and Sharp (2014) report, more work is needed to refine the humane killing of dependent young:</p> <p style="padding-left: 40px;"><i>‘Recommendation: The Code should be reviewed to provide more specific instructions on what actions harvesters should take in specific circumstances when they encounter young-at-foot.’</i></p> <p style="padding-left: 40px;"><i>‘We conclude that further and more detailed research is required to determine if captive-bolt stunning is effective, practical and a more acceptable alternative to the currently used methods.’</i></p> <p>In addition, the RSPCA strongly recommends that an independent assessment of welfare aspects is conducted of the on-the-ground shooting activities to identify areas requiring corrective action as well as to provide evidence that aspects of the plan which are designed to mitigate animal welfare issues are effective.</p>
Page 31, 4.3.1 (e)	<p>Keeping of kangaroos by wildlife carers - states licences will not be issued for the hand-rearing of young kangaroos or their release in the ACT for several reasons including that release may impact on existing resident populations but no details given. In the ACT, the ACT Wildlife and RSPCA ACT has the role of caring for sick, injured and orphaned wildlife and does not hand-rear young Eastern Grey Kangaroos. The RSPCA ACT wishes to continue to care for sick, injured and orphaned wildlife under licence. The RSPCA Policy on this is that rehabilitation and release is supported where there is a high probability of long-term survival in the wild. See - <a href="http://kb.rspca.org.au/RSPCA-Policy-E03-Rescue-and-rehabilitation-of-wild-animals_423.html">http://kb.rspca.org.au/RSPCA-Policy-E03-Rescue-and-rehabilitation-of-wild-animals_423.html</a> for more details.</p>
Page 33, 4.3.1 (f)	States that translocation is not permitted as a management solution due to several reasons.

	<p>Due to the high animal welfare risks, and lack of positive evidence, RSPCA is not generally supportive of translocation of adult kangaroos. However, RSPCA ACT has had considerable success in treating, rehabilitating and transferring joeys to an appropriate facility in New South Wales. The RSPCA wishes to see this activity continue.</p> <p>Also, there is a translocation trial of EGKs underway in Bathurst that may provide further evidence either way. In addition, follow-up monitoring must be undertaken for any translocation programs.</p>
Page 34, 4.3.2	Managing interactions between humans and kangaroos - policy supported.
Page 35, 4.3.3	<p>Managing kangaroo densities - support the approach that 2 key questions must be answered to justify any culling;</p> <ul style="list-style-type: none"> <li>• Is the density of kangaroos causing environmental, economic or social problems?</li> <li>• Will intervention, especially by culling, cause other problems?</li> </ul> <p>These questions should apply to all situations, including requirements for applying for rural landholder shooter permits.</p>
Page 35, 4.3.3 (a)	<p>Methods of culling:</p> <ul style="list-style-type: none"> <li>• We support killing kangaroos by an accurate head shot by skilled and competent shooters as being a humane.</li> <li>• Capture darting and lethal injection for small populations is supported.</li> <li>• Orally ingested poisons - no suitable poison has been currently identified but unless it was humane, RSPCA would not support this method.</li> <li>• Ongoing culling as the method for control is not supported; non-lethal methods must be developed.</li> <li>• Deterrents - more work is being done in this area where animals avoid specific areas and move to other areas - this option should be examined further.</li> </ul>
Page 37 - Policies	<p>Research - should add that formal monitoring to ensure compliance with the national COP needs to be undertaken to provide assurance that welfare is being safeguarded.</p> <p>Note- last line has dropped out of this table.</p>
Page 38 4.3.3 (b)	Fertility control - strongly support further research on non-lethal methods especially GnRH vaccine and chemical sterilisation with vinyl cyclohexene dioxide. Some concerns regarding risks associated with handling that is required for surgical interventions.
Page 40, 4.3.3 (c)	Environmental modification - we have concerns regarding limiting access to water as this can lead to welfare issues; support policy that this will not be undertaken; support the policy that dingoes/wild dogs will not be reintroduced as a form of predator control.
Page 42	<p>Policies on humane treatment of captive kangaroos:</p> <ul style="list-style-type: none"> <li>• Support the requirement for a licence and management plan for any captive population.</li> <li>• Support advice that breeding control is used rather than culling to manage population density.</li> <li>• The policy relating to the removal of a captive population suggests that this is by culling as it is a policy that kangaroos cannot be translocated but this is not explicit.</li> </ul>

Page 46, 5.3.1	Allowing for other forms of herbage mass removal - Suggests that kangaroos will be culled to allow for livestock to graze - disagree that this should be done; if kangaroos are present, it is not justified to cull one species to allow another species to continue grazing.
Page 46, 5.3.2	Kangaroo Management Units - Accept that it is difficult to be accurate regarding kangaroo density but also concerned that by extending the count to include the whole range bounded by features which inhibit kangaroo movement and then artificially allocating a density to the specific nature reserve creates inaccuracy. It is therefore suggested that the plan include monitoring and observations to assess the time spent in the 'difficult' component locations that are used to calculate the density in a kangaroo management unit.
Page 47, 5.4	Area specific management policies - Support that culls on national land by Commonwealth agencies are also subject to the requirements that apply to all other land users.
Page 49	Policies: Grasslands in the western and southern ACT - support euthanasia of sick and starving kangaroos due to food/water shortages.
Page 50, 5.4.3	Greenfield development sites - The notion of culling kangaroos where urban development will cause potential harm and suffering is not considered appropriate. Other options to allow kangaroos to relocate would be more appropriate and acceptable in terms of ethical and welfare considerations. Deterrents should be considered in these circumstances.
Page 52, 6.1	<p>Kangaroo management on rural lands - see previous comment about justification for shooting due to grazing impact and that landholders who wish to shoot kangaroos being required to be assessed for shooting competency, knowledge of the COP and macropod identification test.</p> <p>Also mentions specialised fencing used to control kangaroo movements but there can be high welfare risks associated with such fencing which should be acknowledged and considered.</p> <p>Strongly support that rural lessees must provide evidence regarding the total grazing pressure of kangaroos but also it should be a requirement to report the effectiveness as in most cases, it would appear that monitoring of the number allocated to be shot is not undertaken. Therefore, one must question the effectiveness of this. Also, when reviewing Table 8 on page 53, in 2005 the number of properties licensed was 42 and the number of kangaroos to be shot was 5,170 but in 2015, the number of properties was 80 with the number to be shot set at 20,722. There appears to be a disproportionate increase in the 'kill quota' over this 10 year period without any explanation (i.e. number of properties is double but the 'kill quota' is four times the previous number set).</p>
Page 54, Policies	Kangaroos on rural lands - Records - not only should an annual return on the number of kangaroos culled be provided by authorisation holders but an impact assessment should be reported and to include a description of the parameters to be assessed in the same year and plans for the following year(s).
Page 59	<p>Modifying attributes of the road -</p> <ul style="list-style-type: none"> <li>• Kangaroo fencing has also recently been installed on Hindmarsh Drive where it intersects the Oakey Hill Reserve and Mount Taylor Reserve but this is not mentioned.</li> <li>• The new section of the Kings Highway at Kowen Forest also had significant kangaroo impact issues when it was opened. No signs or fences had been erected beforehand despite the road cutting across</li> </ul>

	<p>kangaroo habitat. Signage and limited fencing was subsequently installed.</p> <p>Agree that where fencing is installed it presents an excellent opportunity for monitoring effects on kangaroo movements but the plan only suggests this - we recommend this research is included as an activity under the plan.</p>
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**Reference:**

McLeod SR and Sharp TM (2014) Improving the humaneness of commercial kangaroo harvesting. RIRDC.

**To:** [Environment](#)  
**Subject:** Draft ACT Controlled Native Species Management Plan for Eastern Grey Kangaroos - RSPCA submission  
**Date:** Thursday, 23 March 2017 12:30:43 PM  
**Attachments:** [image001.png](#)  
[22-03-2017 RSPCA Australia & RSPCA ACT Cover Letter - DRAFT ACT Controlled Native Species Management Plan EGK.pdf](#)  
[22-03-2017 RSPCA Australia & RSPCA ACT Draft Controlled Native Species Management Plan Comments EGK.pdf](#)

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To whom it may concern,

Thank you for the opportunity to provide a submission on the Draft ACT Controlled Native Species Management Plan for Eastern Grey Kangaroos.

Please find attached a cover letter and joint submission from RSPCA Australia and RSPCA ACT.

Should you require any further information, please don't hesitate to contact me.

Kind regards,

