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**Comments by the ACT Animal Welfare Advisory Committee on the
*Eastern Grey Kangaroo: Draft Controlled Native Species Management Plan***

On the 7th March 2017, [REDACTED], Senior Ecologist, EPSD gave a presentation to the members of the ACT Animal Welfare Advisory Committee (AWAC) on the *Eastern Grey Kangaroo: Draft Controlled Native Species Management Plan* (the Plan). [REDACTED] Manager, Conservation Research, EPSD, also attended and provided additional information during the Q&A session that followed [REDACTED] presentation.

On behalf of the members of AWAC, I would like to start by thanking both [REDACTED] [REDACTED] for undertaking this information session for the benefit of the members of the Committee. This written submission will reiterate some of the issues raised by AWAC at the time of [REDACTED] presentation, plus additional ideas brought up in discussion within the Committee and afterwards via email.

1. Declaration of the Eastern Grey Kangaroo (EGK) as a Controlled Native Species

The members of AWAC were very critical that EGKs could be, and were declared Controlled Native Species by the Minister under S 157 of the *Nature Conservation Act 2014* (NC Act) without any consultation with stakeholders, special interest groups including AWAC, or the public. The culling of EGKs in the ACT has been a major animal welfare issue in the Territory for many years, so to make such a significant designation of the species without public consultation is seen as deliberately hiding the decision and therefore bound to be criticized.

2. Application of the Plan in conservation areas

AWAC acknowledges the Plan for the information it contains and the justification it provides for controlling EGKs in conservation areas and in protecting and conserving ecosystems and native fauna and flora in the ACT. The *Nature Conservation (Eastern Grey Kangaroo) Conservation Culling Calculator*, referred to in the footnotes on page 8 of the Plan, supports this view as it not only requires the collection of data on current populations and estimates of population growth but also includes additional expert ecological judgment to allow for environmental variables in setting the number of EGKs to be culled each year.

3. Application of the Plan on rural leasehold in the ACT

Tables 8 and 9 of the Plan show that of the 12,819 EKGs culled (not including pouch young) in 2015 in the ACT, 11,130, or 86% were culled on rural lands. In light of these figures, AWAC has focused on the welfare of EGKs under the Plan as it is applied to rural leaseholds in terms of justification of the number to be culled and the impact of the shooting by rural landholders.

3.1 Justification: In 6.1, page 52 of the Plan, the concept of 'total grazing pressure' is mentioned several times as a factor in setting culling numbers on rural lands. However, the *Nature Conservation (Eastern Grey Kangaroos) Rural Culling Calculator*, referred to in the footnote on page 8 of the Plan, only uses area in

hectares and land boundary perimeter in kilometers to set the maximum permitted cull for any single calendar year. There is nothing in the Calculator that requires any inputs on domestic livestock grazing pressures, grazing and other impacts of kangaroos, type of agriculture – grazing or cropping or even an estimate of the current population of kangaroos on a rural leasehold.

AWAC recommends that the ACT Government makes serious effort to put in place a method of calculating the number of EGKs to be culled on rural lands that considers all the factors necessary to properly justify the number of EGKs to be authorized for culling.

3.2 Culling: AWAC acknowledges that, in an attempt to apply some animal welfare for EGKs during the culling process, the ACT Government has regulated kangaroo culling to ensure that those authorized to shoot kangaroos on rural leaseholds are properly accredited and tested in shooting accuracy and animal recognition and operate within a designated culling season.

To ensure that the majority of EGKs culled in the ACT are culled in accordance with the animal welfare aims of the Plan, AWAC recommends that there should be follow-up spot checks to properly assess that rural landholders are culling, tagging, and disposing of adult and dependent pouch young as required under their authorization.

4. Application of the Plan on greenfield development sites

AWAC recognizes the difficulties in moving kangaroos out of greenfield development sites as Canberra grows and that culling of the resident kangaroo population, as suggested in 5.4.3 of the Plan, may need to be considered.

In response, AWAC recommends that the ACT Government develops and implements an offset program within the ACT specifically for EGKs as greenfield sites are developed. This concept of providing offsets for EGKs in the ACT should be added to the Plan to provide overall protection of EGKs within the ACT as Canberra expands. Such offsets could include more emphasis on the use of higher densities of kangaroos instead of domestic ruminates in the management of fire fuel loads under the *Strategic Bushfire Management Plan for the ACT* and the *Canberra Nature Park Management Plan*.

5. Analysis of the impact on joeys under the Plan:

During the Q&A with [REDACTED], it was apparent that there is a gap in information on the impact of culling adult female EGKs on their joeys-at-foot. While recognizing the difficulties in identifying and tracking joeys-at-foot once their mothers are shot, the welfare outcome for joeys-at-foot is currently unknown.

AWAC recommends that the EPSD Directorate invests in research on this issue with the aim of providing a scientific basis for modification of the Plan if the research suggests such modification would improve the animal welfare outcome for joeys-at-foot.

It was noted that there is no data for pouch young culled in Table 9, Licensed kangaroo culling statistics for ACT rural lands 1997 – 2015, as there is in Table 8, Numbers of kangaroos culled for conservation reasons in CNP. In line with AWAC's recommendation above on following-up rural landholder culling activities with spot checks, AWAC also recommends that data on the culling of pouch young on rural land be collected.

6. Use of the term ‘euthanasia’ in the Plan:

This was questioned and criticized during the AWAC Q&A with [REDACTED]. Since then, a search for the term in the Plan shown that it is used correctly for the humane killing of injured or sedated EGKs. Its use for the application of blunt force trauma to kill pouch young is questionable. However, AWAC notes that the term is used for this activity in the *National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Non-commercial Purposes*.

7. Reducing the number of kangaroos culled each year:

While the Plan sets out the efforts to date to minimise the number of Eastern Grey Kangaroos culled – use of annual culls to avoid scale-up of numbers, fertility research etc., AWAC is concerned that there is no long-term objective within the Plan to ensure that culling will not need to continue as the primary management option into the future.

AWAC recommends that the ACT Government use the opportunity in developing this draft controlled native species management plan for Eastern Grey Kangaroos to add a Goal to the Plan that encompasses a long-term objective of finding ways to manage EGKs within the ACT without using killing as its primary methodology.

[REDACTED]
AWAC Chair
24th March 2017