

NATIONAL ICON VICTORIANS WANT KANGAROOS PROTECTED

Section 1. Preliminary Questions

“The goal of the Victorian Kangaroo Harvest Management Plan is to provide for the sustainable use of kangaroos in a way that protects animal welfare. The goal makes clear that sustainable kangaroo populations and good animal welfare outcomes are the highest priorities.”

Do you agree with the goal of the KHMP?

As Kangaroos Alive we strongly disagree with the goals of the KHMP. The KHMP does not take effective measures to prevent ecological threat or animal cruelty. If animal welfare and maintaining sustainable kangaroo populations truly are the highest priority, then the debate regarding the need for kangaroo management should be completely detached from a profit-driven industry with commercial incentives to kill as many kangaroos as possible.

There is not a single example of commercial wildlife extraction and trade that has worked sustainably or humanely. Not with ivory trade, not with Canadian baby seals, not with whaling, not with fisheries, not with tigers, not with wolves, not with koalas, not with sharks or dolphins. Note that in all of these examples, these native species were also falsely portrayed as pests by the government and their affiliated scientists.

Aboriginal elders, independent experts and scientists worldwide strongly question the need for managing kangaroos that have lived in Australia for over 20 million years without needing human management. Their conservation and welfare should not be the goal of a commercially incentivised ‘plan’, but needs to be the responsibility of the appropriate organisations and experts without commercial interests.

Commercially killing our national icon in demonstrably cruel ways will never lead to more sustainable populations and better welfare than not commercially killing them.

In your opinion do you think the KHMP achieves its goal?

No, quite the polar opposite. The commercial kangaroo industry poses a highly severe animal welfare crisis in the world’s largest land-based wildlife slaughter in the world. There is effectively no monitoring of compliance to the Code of Practice and ample evidence of systemic breach. Multiple independent studies show that up to 40% of commercially shot kangaroos are not ‘correctly’ shot in the brain, leading to prolonged suffering (1, 2).

According to the RSPCA, the recommended killing methods of dependent joeys (around a third of shot animals are female) are unlikely to be achieved instantly and in a humane way by an unskilled shooter managing a struggling joey (2). Research has revealed that in 99 percent of cases, dependent at-foot joeys are left to die alone after their mother is shot by the industry, with no attempt made by professional shooters to locate and kill it. This leads to severe suffering of joeys.

The Victorian State Government Website claims that one of the reasons for supporting the KHMP is prevent kangaroos 'competing' with livestock. This industry narrative is unscientific and has been debunked by decades of evidence. It is well established that a single sheep eats 5 times more and a cow up to 50 times more than an adult kangaroo. Kangaroos contribute between 1-8% of total grazing pressure, while introduced, non-native farm animals contribute the remaining 92-99% (4)

Since the commercial industry started in Victoria, we have seen a fivefold increase in kill quotas (Comparing 2010-2012 to 2021-2023)(5). Meanwhile, the 2021 NSW Parliamentary Inquiry into the health and wellbeing of kangaroos revealed that the methods used to estimate kangaroo populations are highly unreliable and inaccurate. This is also evidenced in Victoria by the claimed population increases of over 40% in some areas (5), while the biological growth rate of kangaroo populations is 10% in good years. As a result, nobody knows how many kangaroos there are, but citizens are increasingly reporting local extinctions as well as gunshots near their homes.

The damning report following the Kangaroo Pet Food Trial, warning for increased (rather than the promised decrease) waste of kangaroo body parts, lawlessness and ecological threat, was blatantly ignored by the Victorian government as they opened nearly the entire state to this commercial, barbaric practise.

- (1) See Dror Ben-Ami, Animal Liberation (NSW), A Shot in the Dark: A Report on Kangaroo Harvesting (2011)
- (2) Submission 404a, Ms Diane Smith and Mr Greg Keightley, Health and wellbeing of kangaroos and other macropods in New South Wales / portfolio Committee No. 7 – Planning and Environment [Sydney, N.S.W.]: the Committee, 2021. (Report no. 11 / Portfolio Committee No. 7 – Planning and Environment)
- (3) Evidence, Ms Sutterby, 11 June 2021, p 16. Health and wellbeing of kangaroos and other macropods in New South Wales / portfolio Committee No. 7 – Planning and Environment [Sydney, N.S.W.]: the Committee, 2021. (Report no. 11 / Portfolio Committee No. 7 – Planning and Environment)
- (4) See Croft, David Benjamin, and Ingrid Witte. "The perils of being populous: Control and conservation of abundant kangaroo species." *Animals* 11.6 (2021): 1753.
- (5) Analysis on Nature Knowledge Channel by Creative Cowboys - <https://www.creativecowboyfilms.tv/earth/2023-the-commercial-exploitation-of-kangaroos-in-victoria>

Objectives Questions

1. Ensure that commercial kangaroo harvesting in Victoria is ecologically sustainable.

Is this objective being met?

No

Are the requirements for meeting this objective appropriate?

No

What other requirements might be needed to meet this objective?

The precautionary principle must be applied immediately. There are currently no reliable population estimates due to demonstrably inaccurate and questionable survey methods, in which counts from only a small aerial transect are extrapolated using changing correction factors and unsubstantiated assumptions.

Little is known about the effects that climate change, exacerbating droughts, fires and floods, will have on kangaroo population dynamics. Experts are concerned that this will lead to even more dramatic population collapses ('bust'). The commercial industry, targeting the heaviest (read: healthiest and strongest) individuals, puts extra pressure on already vulnerable populations, further reducing their chances of slowly recovering (maximum biological growth rate is just 10% for kangaroos, with only one offspring per year and 70% joey mortality rate)(1)

No research has been conducted to assess the potential long-term consequences of disrupting kangaroo families and communities through commercial shooting. The absence of studies leaves us uncertain about the extent of harm we may be causing to the species' long-term survival by removing the most robust and genetically fit adult individuals from the population, wiping out the next generations by bludgeoning countless joeys as collateral deaths after shooting their mothers, disrupting the mobs' social stability, causing the loss of crucial generational knowledge and causing increased threat perception and trauma in the surviving individuals (2)

It is crucial that policies are driven by evidence rather than commercial incentives. The Victorian government ran the Kangaroo Pet Food Trial to determine whether commercial use of kangaroos was viable and sustainable in Victoria. Despite the government department assessment of the trial recommending against it, stating it is an "unacceptable risk to the sustainability of kangaroo populations", the Victorian Government chose to ignore these recommendations from their own department and allowed the commercial industry to wreak havoc since. This decision needs to be revoked immediately.

Lastly, the government urgently needs to make the raw data from aerial surveys and the complete statistical models (including all its assumptions and correction factors) available in a transparent and accessible way to allow for peer review and independent expert scrutiny.

- (1) Submission 270, Mr Ray Mjadwesch, p 9; Evidence, Mr Mjadwesch, 11 June 2021, p 7. Health and wellbeing of kangaroos and other macropods in New South Wales / portfolio Committee No. 7 – Planning and Environment [Sydney, N.S.W.]: the Committee, 2021. (Report no. 11 / Portfolio Committee No. 7 – Planning and Environment)
- (2) Austin, Caitlin M., and Daniel Ramp. "Flight responses of eastern gray kangaroos to benign or harmful human behavior." *Ecology and Evolution* 9.24 (2019): 13824-13834.

Are the targets and management actions appropriate measures for achieving these requirements?

No

What other targets or indicators might be necessary for existing requirements?

Reliable and fully transparent survey methods, that are subject to independent scientific scrutiny, must be applied to provide accurate population estimates before a discussion on the need for management can be held.

The KHMP fails to define how severe a climate disaster (e.g., drought, fires, floods) needs to be to trigger a population count that may lead to the cessation of commercial killing, or how concerned citizens may request this. The 2022 floods lead to devastation on kangaroo populations, yet the commercial killing continued without any assessment, dismissing repeated concerns from wildlife carers, experts, animal welfare organisations and citizens.

The claim that 100% of reports of non-compliance will be investigated is meaningless unless it is defined what this investigation entails. In practice, this 'investigation' often consists of little more than asking whether the complainant has evidence, which is hardly ever the case as the killing takes place in the darkness in remote area, citizens usually don't have the equipment required to make night time recordings, and complaints usually cannot be lodged until the next morning.

Therefore, continuous monitoring of compliance is an absolute prerequisite.

2. Ensure that commercial kangaroo harvesting in Victoria is humane and animal welfare is protected.

Is this objective being met?

No

Are the requirements for meeting this objective appropriate?

No

What other requirements might be needed to meet this objective?

Neither the KHMP nor the Code or Practice currently prevent cruelty or inhumane treatment of kangaroos, but instead are the single largest causes of it. Animal welfare is not protected at all.

There is currently a deeply disturbing lack of monitoring at the point of kill. Meanwhile, independent studies reveal that up to 40% of commercially shot kangaroos are not shot in the brain but instead are shot in the neck, ears, eyes, limbs or body, leading to a slow death and prolonged suffering (1). This figure does not include the kangaroos who escape the shooters mutilated, or the thousands of healthy, dependent joeys who are legally bludgeoned to death.

The 2021 NSW parliamentary inquiry committee accepted the view that '*chiller inspections alone are inadequate for monitoring for possible animal cruelty in the industry.*' In evidence

put before the committee it was pointed out that “... commercial shooters are not paid for body-shot kangaroos, and therefore do not bring them to processing facilities, and wounded animals that escape will not be tagged and therefore not counted. The RSPCA similarly argued that the current system does not allow verification of whether all kangaroos have been killed with a head shot, because kangaroos that are injured and escape may not be reported, and heads are removed in the field, sometimes very low, meaning that accidental neck shots may be concealed.”

While the KHMP requires shooters “to demonstrate minimum standards of competency set out in the National Code prior to receiving authorisation to harvest under the Plan”, the training and proficiency testing differs greatly from conditions in the field (shooting moving animals in the dark at great distance) and does not have any proficiency test for how to ‘humanely’ bash a joey to death or euthanise at foot joeys.

According to the RSPCA, the recommended killing methods of dependent joeys (approximately a third of shot animals are female) are unlikely to be achieved instantly and in a humane way by an unskilled shooter managing a struggling joey (2). Research has revealed that in 99 percent of cases, dependent at-foot joeys are simply left to die alone after their mother is shot by the industry, with no attempt made by professional shooters to locate and kill them (3). This leads to the severe, prolonged suffering of joeys.

The bare minimum requirement for regulation of any killing industry should be continuous monitoring at the point of kill, so compliance to the Code of Practice can be ensured. Without any monitoring, the Code of Practice (that fails to prevent cruelty even when complied to) is voluntary and even more meaningless.

- (1) Submission 404a, Ms Diane Smith and Mr Greg Keightley, Health and wellbeing of kangaroos and other macropods in New South Wales / portfolio Committee No. 7 – Planning and Environment [Sydney, N.S.W.]: the Committee, 2021. (Report no. 11 / Portfolio Committee No. 7 – Planning and Environment)
- (2) Evidence, Ms Sutterby, 11 June 2021, p 16. Health and wellbeing of kangaroos and other macropods in New South Wales / portfolio Committee No. 7 – Planning and Environment [Sydney, N.S.W.]: the Committee, 2021. (Report no. 11 / Portfolio Committee No. 7 – Planning and Environment)
- (3) McLeod, Steven R. Improving the humaneness of commercial kangaroo harvesting. RIRDC, 2014.

Are the targets and management actions appropriate measures for achieving these requirements?

No

What other targets or indicators might be necessary for existing requirements?

An immediate moratorium on the commercial killing of kangaroos is the only way to ensure animal welfare and the humane treatment of kangaroos. Years of evidence have shown that self-regulation does not work in this industry that is only driven by profit and disregards animal welfare.

There is a mountain of evidence for the systemic breach of the voluntary and unmonitored Code of Practice, yet hardly any license suspensions. This clearly demonstrates the lack of regulation.

The 2021 NSW parliamentary inquiry revealed that there is no humane way to kill independent joeys and that the commercial industry inherently comes with tremendous suffering. If it cannot be done humanely, it shouldn't be done at all. The fact that we are allowing this to be done on an enormous scale to intelligent, sentient beings and our national icon is an absolute disgrace.

3. Ensure that commercial kangaroo harvesting and processing activities are appropriately regulated.

Is this objective being met?

No

Are the requirements for meeting this objective appropriate?

No

What other requirements might be needed to meet this objective?

The Code of Practice is nearly impossible to enforce as the killing takes place at night, often in remote areas. However, monitoring at the point of harm should be the bare minimum of any kill industry that wishes to call itself appropriately regulated.

No record is kept of the number of mis-shot and wounded kangaroos who are not killed instantly, or of the number of healthy, dependent joeys who are either bludgeoned to death as collateral victims of the commercial industry or are left alone to die a slow death of dehydration, starvation, predation and exposure. As a result, the suffering of countless kangaroos caused by commercial shooting goes completely unmonitored and unreported. As a bare minimum, the KHMP must include an accurate and verifiable system of collecting this data and making it transparently available. Without this data, all claims of animal welfare and humaneness are unsubstantiated.

While studies reveal that up to 40% of commercially shot kangaroos are mis-shot (1, 2) wounding is hardly addressed in the Code of Practice. 'Every reasonable effort' is an ambiguous choice of words. There is no commercial incentive to find or report mis-shot kangaroos as they will not be accepted at the chillers. Effective measures are required to disincentivise cruelty and apathy towards wounded kangaroos in order to reduce suffering.

Primarily for the kangaroos, but also for the wildlife carers and other citizens who rescue the kangaroos that are left mutilated or orphaned by the commercial industry, leaving these people emotionally traumatised.

- (1) See Dror Ben-Ami, Animal Liberation (NSW), A Shot in the Dark: A Report on Kangaroo Harvesting (2011)
- (2) Submission 404a, Ms Diane Smith and Mr Greg Keightley, Health and wellbeing of kangaroos and other macropods in New South Wales / portfolio Committee No. 7 – Planning and Environment [Sydney, N.S.W.]: the Committee, 2021. (Report no. 11 / Portfolio Committee No. 7 – Planning and Environment)

Are the targets and management actions appropriate measures for achieving these requirements?

No

What other targets or indicators might be necessary for existing requirements?

While an immediate moratorium on the commercial killing of kangaroos is the only ethically and ecologically responsible measure, the following regulations should be the bare minimum.

All program reports, violation reports, raw survey data and statistical methodology should be made publicly available in an accessible manner.

To mitigate the current, systemic breach of the Code of Practice, there should be constant monitoring at the point of kill. This may include the use of body cameras and regular unannounced compliance checks through carcass inspections.

Commercial shooter licences are currently too easily obtained, they are clearly ineffective in regulating behaviour, there are no requirements for applicants to prove they have no previous violations of the Code of Practice, or previous convictions under other legislation (e.g., POCTA) and licenses are hardly ever suspended due to the lack of monitoring and evidence when cruelty occurs.

There needs to be a clear zero-tolerance policy for non-compliance to the Code of Practice which can be acted upon when assessing continuous footage and carcasses.

4. Effectively monitor and enforce compliance.

Is this objective being met?

No

Are the requirements for meeting this objective appropriate?

No

What other requirements might be needed to meet this objective?

As discussed above, there is an unacceptable lack of monitoring and enforcement in this entirely self-regulated industry. As a result, the Code of Practice is systemically breached without consequences, leading to the suffering of both adults and joeys on an unimaginable scale. There needs to be continuous video monitoring at the point of kill, unannounced compliance checks and more thorough carcass checks at the chillers.

The 2021 NSW parliamentary inquiry committee concluded that '*chiller inspections alone are inadequate for monitoring for possible animal cruelty in the industry*', as there is no incentive to bring in or report mis-shot kangaroos, which studies reveal may be up to 40% of the total.

Shooter proficiency tests must reflect realistic, least favourable field conditions: darkness, wind and rain.

Residents are increasingly exposed to safety risks and distress as commercial shooting takes place near their homes, targeting their beloved local mob or hand-raised orphaned joeys. To improve safety, all planned shooting should be announced beforehand, allowing enough time for feedback. Objections must trigger a process at the VCAT.

Are the targets and management actions appropriate measures for achieving these requirements?

No

What other targets or indicators might be necessary for existing requirements?

Rifles and body-mounted cameras for continuous recording and monitoring of shooter behaviour and accuracy.

Unannounced compliance checks in the field.

A zero-tolerance policy for breach of compliance with the Code of Practice.

The results of field depot and harvest vehicle audits, as well as reports of complaints and license suspensions must be made available for the public within a predetermined timeframe.

When residents raise objections, all responses must be genuinely considered, investigated and acted upon, with feedback to the complainant within an acceptable timeframe.

5. Facilitate adaptive management and research.

Is this objective being met?

No

Are the requirements for meeting this objective appropriate?

No

What other requirements might be needed to meet this objective?

There is currently insufficient data collection to conduct research or to inform regular evaluation of the KHMP and how it meets its goals. No data is recorded on the number of joeys killed as collateral deaths, the number of mis-shot kangaroos or the true number of non-commercially shot kangaroos. As the methodologies for population surveys are demonstrably inaccurate, there are no reliable kangaroo population estimates. Research can't inform adaptive management if the appropriate data is not properly collected.

Furthermore, there should be continuous, representative research into the level of public support of the industry, and spending taxpayer's money on a commercial practice that poses a great threat to public health and safety, animal welfare, ecological stability and Australia's international reputation. This will reveal that the majority of Victorians do not agree with the commercial exploitation and abuse of our national icon and the deep spiritual harm it causes to First Nations people.

The trigger points to guide adaptive management are currently not identified. These need to be clearly defined together with their respective adaptive management strategies, keeping in mind the precautionary principle.

To prevent the research program being open only to biased or self-serving studies, all research opportunities should be evaluated by an independent committee. Quotas should be set for different fields of research to ensure breadth and depth of knowledge that is acquired. The department should pursue the gathering of information equally with both stakeholders who oppose and who support the KHMP.

Are the targets and management actions appropriate measures for achieving these requirements?

No

What other targets or indicators might be necessary for existing requirements?

The department must direct research funds into studying and improving non-lethal kangaroo management strategies, wildlife road safety and other methods to promote non-violent coexistence.

The department should conduct research into the true contribution of the commercial kangaroo industry to Victoria's economy, and the potential economic benefits of stimulating eco-tourism. Decade old, repeated claims of being a \$200 million industry are based on unsubstantiated assumptions of supposed ecological benefit and jobs provided, while an independent economic study from 2013 revealed that the true economic value is likely around \$88 million while the number of full-time jobs provided may be as low as 880 (1). Ten years later, these figures will likely have dropped even further. The Gross Value of Production of the kangaroo industry was \$25 million in 2021 (2).

(1) Boronyak, L., Ben-Ami, D., Croft, D., Ramp., D (2013) Kanganomics: a socio-economic assessment of the commercial kangaroo industry. Report by the Centre for Compassionate Conservation at the University of Technology, Sydney, March 2013.

(2) Government Notices Gazette C2022G00091 07/02/2022

6. Maintain openness, accountability and transparency.

Is this objective being met?

No

Are the requirements for meeting this objective appropriate?

No

What other requirements might be needed to meet this objective?

The objective to maintain openness, accountability and transparency can only be met if the appropriate data is collected and made publicly available. There is currently no or insufficient data on the number of kangaroos that are mis-shot, joeys that are killed as collateral deaths, numbers of non-commercially killed kangaroos, the body weight of targeted kangaroos, etc.

Openness and transparency are virtually non-existent as a result of the way the program is organised between departments, making it extremely difficult for the public to access basic data or find answers to their questions.

All relevant information should be made readily accessible to the average citizen. This includes transparent information on population survey methodologies and statistical models (including correction factors and assumptions), numbers of permits granted under the KHMP, human safety measures, the number of reported violations and the handling of complaints.

Accountability is non-existent, because there are currently no adequate consequences for animal cruelty and breaches with the Code of Practice as there is no monitoring at the point of kill. Furthermore, because no reliable population estimates exist, the department cannot be held accountable for causing irreversible ecological damage, despite alarms raised by independent experts and increasing reports of local extinctions.

The majority of Victorians opposes animal cruelty and commercial wildlife trade of native species, especially when it comes to our national icon. When going against these societal values, the department must first be open to extensive and genuine consultation with the community.

The KHMP must be open and transparent about its true objections. While it is being presented as a necessary measure of managing kangaroo populations, studies and independent experts suggest that kangaroos do not need to be managed (1). Instead, the program should be named to reflect its true goal of commercially exploiting native wildlife.

- (1) Ben-Ami, D., Boom, K., Boronyak, L., Croft, D., Ramp, D., Townend, C. (2011). Welfare implications of commercial kangaroo harvesting: Do the ends justify the means? THINKK, the kangaroo Think Tank, University of Technology, Sydney

Are the targets and management actions appropriate measures for achieving these requirements?

No

What other targets or indicators might be necessary for existing requirements?

To improve openness, accountability and transparency, a community contact centre must be established, being available at all times to respond to incidents and to process and act upon reports of cruelty in a satisfactory manner.

7. Work with Traditional Owners to provide opportunities for participation.

Is this objective being met?

No

Are the requirements for meeting this objective appropriate?

No

What other requirements might be needed to meet this objective?

The commercial kangaroo industry is considered culturally deeply offensive and spiritually harmful to many First Nations people. Kangaroos are considered a sacred totem and a creator spirit.

The 2021 Yuin Declaration for Kangaroos (1) recognizes kangaroos as intelligent, sentient beings, living in family groups and having their own songlines, language, culture and dreaming. It states:

'This ancient iconic native animal therefore claims sovereign rights above and beyond any human claims of dominion over them. Today we declare, from this day forward, all kangaroos shall be justly protected from all harms caused by human abuse and exploitation. We vow to hold governments and their citizenry accountable for any breaches of this sovereignty.'

Evidence presented to the 2021 NSW parliamentary inquiry once again revealed that shooting kangaroos causes substantial cultural and spiritual harm to many Aboriginal people, who consider kangaroos spiritual creatures to be treated with respect. Their people can only kill kangaroos for 'what was needed' or 'on a survival basis'. Hunting kangaroos for profit is considered culturally offensive and using the hunting of First Nations people as a justification for shipping body parts of these totemic animals overseas is highly misplaced cultural appropriation.

As evidenced before the inquiry committee, kangaroos have spiritual and generational significance to many First Nations peoples, and are considered their ancestors. As a result, the commercial slaughter of kangaroos causes them immense spiritual harm. One Indigenous inquiry participant said: *'Basically it is like having your entire family gunned down every night . . . and their bodies dissected, butchered, cut up, sold off, taken overseas and dressed up as a commodity for profit.'* The participant explained that when raising her concerns to government agencies, their responses had been *'completely [and] utterly dismissive [and] appalling, in its disconnected arrogant, smugness'* (2)

The inquiry report recommended *'that the NSW Government undertake extensive and genuine consultation with Aboriginal peoples to seek their views regarding the commercial and non-commercial culling of kangaroos, and ensure these views are given serious consideration in the development of all future kangaroo management plans'* and *'incorporate the genuine involvement of Aboriginal peoples in the management of kangaroo populations.'*

By extension, this recommendation should apply to the Victorian government as well before approving any KHMP. Because if approved, the new KHMP will continue to cause serious cultural offense and irreversible spiritual harm to many First Nations people, gravely affecting their mental and physical health.

(1) Yuin Declaration for Kangaroos (2021) - Available on <https://www.kangaroosalive.org/yuin-declaration>

Are the targets and management actions appropriate measures for achieving these requirements?

No

What other targets or indicators might be necessary for existing requirements?

It needs to be openly and transparently made public which First Nations people or organisations were consulted and involved, and how precisely.

It needs to be made public how many First Nations people are truly employed by the kangaroo industry. Continued claims of providing jobs to First Nations people and supposedly having their support, while the clear outcries from First Nations people to stop the commercial slaughter are so loud and clear, need to be backed up by evidence and numbers.

Meanwhile, it needs to be internalised within the department that the approval or participation of some First Nations people does not automatically mean the support from all First Nations people and certainly does not invalidate the repeated, heartbreaking concerns raised by many First Nations people.

Section 2.

Are the existing objectives sufficient?

No

Should there be additional objectives not currently captured or changes to existing objectives?

Essential objectives of the KHMP process should include:

Promoting harmonious coexistence with native wildlife, including kangaroos, through (research into) non-lethal management practises and the use of wildlife corridors.

Representative research into public values regarding Australian wildlife trade and the cruelty towards, and commercial exploitation of, our national icon.

Genuine consultation with a wide range of First Nations people and careful consideration of their concerns.

Independent research into the economic value of the commercial kangaroo industry and the ecological and economic necessity to kill kangaroos.

Do you have any final comments that have not been addressed in the above questions?

Kangaroos Alive is a global movement for the ethical treatment of kangaroos. As Kangaroos Alive, we request the opportunity to continue the conversation with the department and to discuss the points and concerns addressed in our submission in greater detail.