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Review of the Kangaroo Harvest Management Plan Submission Guide

Introduction

Victoria's Kangaroo Harvest Management Plan (KHMP) is a cleverly written document that tries to convince the reader that kangaroos are abundant throughout the state, to such an extent that the government is going to do everyone a favour by 'managing' the populations to help rid farmers of these 'pesky' animals and to create jobs and income for the state at the same time.

In reality, it is a plan to capitalise on our unique keystone species by using questionable data to justify a large-scale slaughter for the financial benefit of a select few. Meanwhile, residents across Victoria are telling us that kangaroo populations are declining at an alarming rate, and they are terrified of shooters who come without warning and leave behind beloved local kangaroos as a pile of stinking heads, guts and paws near local homes and businesses.

Furthermore, it is standard practice for kangaroo shooters to cruelly bash pouch joeys to death whilst dependent at-foot joeys are regularly left to slowly perish without maternal care. Inevitably there are mis-shot adults who also escape to suffer a slow death from their wounds. This brutality inherent in the kangaroo industry would horrify and repulse most Victorians, but it is deliberately shrouded in secrecy, and many are not even aware it exists.

This consultation is your chance to speak up for our macropod friends and tell the government that kangaroos need protection, not 'management'. If possible, please take the time to read the full KHMP document, or you can simply use this guide to assist you in responding to the survey.

Kangaroos are counting on you to be their voice!

Consultation Details

Seven objectives are described in the Plan:

1. Ensure that commercial kangaroo harvesting in Victoria is ecologically sustainable.
2. Ensure that commercial kangaroo harvesting in Victoria is humane and animal welfare is protected.
3. Ensure that commercial kangaroo harvesting and processing activities are appropriately regulated.
4. Effectively monitor and enforce compliance.
5. Facilitate adaptive management and research.
6. Maintain openness, accountability and transparency.
7. Work with Traditional Owners to provide opportunities for participation.



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The consultation consists of (the same) 5 questions about each of these objectives. 3 of the questions are a 'Yes/No' tick box and 2 of the questions allow you to make comments. This guide has a number of suggestions for each of these questions to give you some ideas about points you might like to mention. You can make one or multiple points for each question, and you can choose to only answer one, or some, or all.

Unfortunately, there is NO option to just write a paragraph or a page discussing why you are opposed to the commercial killing industry.

Also, the focus of the consultation is solely on the KHMP, they are not considering the cruel Authority to Control Wildlife permit system at all, so focusing your comments on the horrors of the **commercial kangaroo killing** industry, rather than broadly voicing your opposition to ALL kangaroo killing will have more impact.

For more information, and to download the Kangaroo Harvest Management Plan, go to <https://engage.vic.gov.au/download/document/31187>

Consultation closes on **Tuesday, 11th July 2023**

To make a submission, go to <https://engage.vic.gov.au/kangaroo-harvesting-management-review>

1. Scroll down to the 'Participate' tab and click 'start survey'.
2. It first asks you to 'rank' the importance of the 7 objectives. We suggest skipping this section as it implies tacit agreement with these objectives which exist only to support the continued commercial exploitation of kangaroos. However, you can of course fill it in as you prefer.
3. The survey will then ask you to select if you would like to complete section 1, section 2 or both. Please tick both.
4. Section 1: there are two general questions regarding the KHMP, then you can either just click the 3 checkboxes for each objective and move on, or give written feedback on some or each objective in the space provided.
5. Section 2: has a tick box and two more generic questions.
6. After answering, you will be asked to indicate your 'area of interest'.
7. You will also need to include your name, address and email contact.
8. And answer the privacy/collection question about whether you are willing for your answers to be published with your name attached or not. This depends entirely on your personal preferences.



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Ideas on How to Respond

Below are some points you may like to focus on in your submission:

These points are suggestions ONLY, please DO NOT copy and paste them as 'cookie cutter' responses will not have as much impact. Select whichever point(s) are most important or meaningful to you, and use them as inspiration to write your own response.

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?

- I fundamentally disagree with the goal of the KHMP and completely oppose the commercial exploitation of wildlife.
- The commercial killing of kangaroos represents one of the most significant animal welfare issues facing land-based wildlife in the world. This is an embarrassment to Victoria on a global scale.
- The goal of the KHMP is a fallacy; there is NO sustainable number of kangaroos who can be killed, when kangaroo populations are based on unreliable estimates.
- Despite the kangaroo slaughter industry benefiting from misconceptions about kangaroo populations, the truth is that kangaroos are being slaughtered purely for money – fuelled by the international trade in kangaroo leather and meat products. The combined average kill quotas have more than tripled in Victoria since commercialisation.
- Wildlife trade is completely irresponsible. Victoria's kangaroos are a critical part of our biodiversity, and killing them en masse is having an unknown impact on the broader ecosystem.
- We are in the middle of a sixth mass extinction and biodiversity crisis with wildlife making up only four percent of the world's mammalian biomass. Now is the time to protect what we have left, especially essential keystone kangaroos.
- The Victorian State Government Website states that one of the reasons they support the KHMP is to stop kangaroos 'competing' with livestock.¹ Killing our native wildlife to 'make room' for introduced sheep and cattle is unconscionable.

¹ <https://djsir.vic.gov.au/game-hunting/kangaroo-harvesting>



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- Not only is kangaroo meat full of parasites and pathogens, it is well known that 75% of new and emerging infectious diseases in humans are zoonotic (originating in other animals) and the mass exploitation and handling of wild animals is of particular concern.
- The inevitable cruelty of the kangaroo industry should see this wildlife trade abolished. Not only will kangaroos be horrifically wounded, joeys will be bashed to death or left to perish slowly without maternal care.
- There is virtually no oversight and accountability for shooters at the point of kill, which is unacceptable.

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

- No. I strongly believe the KHMP is enabling an unavoidably cruel and irresponsibly unsustainable and unhygienic wildlife trade that should be immediately abolished.
- The 2018 review of the Kangaroo Pet Food Trial showed commercialisation massively increased the rate of killing, may have actually increased waste, as well as being lawless, a threat to sustainability, and low value to the taxpayer. This damning report was brazenly ignored by Victorian Labor who launched the 'Kangaroo Harvesting Program', removed the need for landholder permits and opened nearly the whole state to 'harvesting'.²
- Under the current national Code of Practice, the KHMP is causing immeasurable suffering to pouch and at foot young kangaroos.
- The current KHMP lacks transparency as it is reliant on self-regulation in the field, at night time. There is virtually no in-field monitoring or oversight of shooter conduct, accuracy or compliance with the Code of Practice. Local residents that have witnessed commercial shooters have reported acts of blatant cruelty, but as most do not have equipment to film at night it is challenging to gather sufficient evidence.
- Residents in areas where commercial shooting of kangaroos takes place are increasingly being left to seek help for kangaroos who have been wounded and then escaped, or joeys who have been orphaned. Volunteer wildlife rescuers and carers are spending their time and money 'mopping up' after this industry.
- The commercial killing of kangaroos authorised under the KHMP is having a devastating impact on the well-being of wildlife volunteers. Not only is their workload and trauma increased, they face the anxiety of knowing shooters are active near authorised wildlife shelters and release sites. Whilst they work hard to instil community respect for wildlife, the government is actively undermining their efforts by putting a bounty on the heads of the animals that they have invested their time and funds to painstakingly raise and/or rehabilitate.
- The commercial industry provides very little benefit to the local community. Local residents are facing nightly disturbance and waking up to horrific situations of dead and dying animals in their own backyards, all for the sake of an industry enjoying commercial gain.

² <https://img1.wsimg.com/blobby/go/a5643baa-d4d8-4ba8-988b-7006e9477449/downloads/KPFT-Evaluation-Report-Dec-2018.pdf?ver=1685624802304>



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- The commercial exploitation of wildlife and the unavoidable cruelty that is inherent to the commercial kangaroo killing industry is fast losing social licence here in Victoria, and even more so internationally.³
- In recognition of the extreme cruelty and unsustainable nature of the commercial trade, legislation is now pending within the USA and EU to prohibit the import and sale of kangaroo products. This sentiment is also being reflected commercially, with major sporting and fashion brands like Nike, Puma, Gucci and Prada ending their use of kangaroo leather.
- The Victorian Government is using outdated criteria for what constitutes 'sustainable'⁴ and does not take into account the ongoing stressors to kangaroo populations, including the continuation of a commercial shooting industry, non-commercial shooting, the climate crisis, habitat loss and fragmentation, roads, fences, introduced predators, disease etc.
- The KHMP cannot achieve its sustainability goals when they are basing their decision making and evaluation on incomplete data. There are currently no reliable methods of accurately gauging kangaroo abundance, as government surveys are based on extrapolating data from small aerial transects. Therefore, there should be no slaughter of kangaroos on the basis of the currently used survey methods which are deeply flawed and inevitably inaccurate.

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?

- There are currently no reliable methods of accurately gauging kangaroo abundance as government surveys are based on extrapolating data from small aerial transects. There should be no slaughter of kangaroos on the basis of the currently used survey methods which are deeply flawed and inevitably inaccurate.
- There is no timeframe in the requirements for how often 'regular' population surveys will be conducted nor is there a description of the criterion used to establish triggers for

³ For example: <https://kangaroosarenotshoes.org/>

⁴ Caughley et al. 1987; McLeod et al. 2004



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suspending the harvest. This vagueness and lack of clarity around ongoing monitoring systems erodes any claims of sustainability being the goal.

- There have been no studies on the longer-term impacts of disrupting kangaroo families and communities by shooting them. We may be doing untold damage to the long-term viability of the species by removing the largest and fittest adults from the population. Without this critical research, commercial shooting should not be allowed.
- The KHMP states that 'management must ensure that viable populations of kangaroos are maintained throughout their range to achieve this objective' - how can that be guaranteed when there is nothing to stop a commercial shooter from extirpating kangaroos from an area with landholder/s permission and enough tags? There's no minimum weight and no minimum number that must be left alive, so theoretically they can all be killed in a given location. There must be safeguards in place to ensure viable populations are genuinely protected.
- The process to engage a commercial shooter is very simplistic and does not require any evidence of conflicts with kangaroos, or that non-lethal options have been attempted. It should never be as simple as three minutes on the Service Victoria app for a landholder to be able to wipe out a keystone native herbivore on their property. There must be a rigorous requirement for landholders to prove a genuine issue.
- We need to be investing in infrastructure for ecotourism and promoting peaceful coexistence strategies, so that wildlife can flourish. The KHMP actively disincentivises efforts to coexist with wildlife.
- We need an independent analysis of the supposedly 'precautionary' approach of allowing 10% of the guesstimated population to be killed. Not only is it irresponsible and reckless to base kill quotas on imprecise data, killing 10% of the kangaroo population is too much even if the population counts were accurate. Given grey kangaroos can only reproduce at best by 10% per annum under ideal conditions with no shooting, the KHMP is inevitably killing kangaroos at a faster rate than they can breed.⁵ If the precautionary principle were truly being applied, the KHMP would be ceased.
- Decision making needs to be based on evidence. The Victorian Government ran the Kangaroo Pet Food Trial to determine if commercial use of kangaroos was viable and sustainable. A government department assessment of the trial recommended it should not continue; one concern was that it was an "unacceptable risk to the sustainability of kangaroo populations".⁶ The Victorian Government ignored recommendations from their **own** department and established a permanent commercial program.
- There must be a rapid disaster trigger included in the KHMP. If experts in the field, such as Wildlife Victoria, report concerns about impacts on kangaroo populations, this should trigger an immediate end to further slaughter. In addition, kangaroo populations must be carefully monitored during and after an environmental event or natural disaster. As we have seen in the 2020 Black Summer fires and the 2022 flood emergency in Victoria, the impacts on

⁵ <https://www.kangaroosatrisk.org/biology.html>

⁶ DELWP (2019) Kangaroo Pet Food Trial Evaluation Report. Department of Environment, Land, Water and Planning, Victorian Government. https://www.wildlife.vic.gov.au/__data/assets/pdf_file/0019/412723/KPFT-Evaluation-Report_Dec_2018a.pdf



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localised populations of kangaroos are poorly monitored by government authorities and continued shooting in these areas poses a serious risk of localised extinction. Even if shooting is temporarily halted, the current KHMP stipulates that when killing does resume the FULL quota will be reinstated. Considering this may be only weeks later, there is no way that populations of kangaroos have had a chance to recover. This is blatantly irresponsible and must be urgently amended.

- The knowledge and expertise of local government is currently ignored in the implementation of the KHMP. The current harvest zone boundaries include some areas on the fringes of Melbourne such as the Mornington Peninsula and Nillumbik whose kangaroo populations are condensed into small areas of land due to urban sprawl and development eroding their habitat. Shooting kangaroos in regions like these risks human safety and localised extinction.

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 only ethical and responsible target is the immediate abolition of the commercial kangaroo industry in Victoria and a focus on respectful coexistence with wildlife.
- An accurate and fully transparent counting method must be employed, which would unarguably demonstrate that kangaroo populations are so low that there is no ecologically sustainable way they can be killed.
- There are no clearly identifiable triggers for how severe an event or disaster needs to be in order to trigger a population count that may lead to a cessation of the KHMP, nor who can identify or request this.
- There is no established method for communities to request a population count following an event or disaster and no method of recourse if they are refused. For example, the severe floods of 2022 had devastating impacts on kangaroo populations, yet repeated requests from wildlife rescuers and carers for DELWP to conduct a population count to see if triggers had been met were refused.
- There are no clearly identifiable triggers for how severe an event or disaster needs to be in order to trigger a cessation of the KHMP, nor how this will be evaluated when an area may be unsafe to access to conduct population counts, or when efforts will be centred on rescue.
- Stating that 100% of reports of non-compliance will be investigated is misleading. Investigations rarely occur in real time, so the ability to follow up relies on the 'evidence' of shooter identity collected by residents. Since kangaroo shooting occurs in darkness, the ability of members of the public to obtain evidence of a high enough quality to enable follow up is unlikely. Without widespread, regular monitoring every night across the entire state, this target is meaningless.



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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?

- Not terrorising, killing and maiming healthy kangaroos for profit.
- Not destroying mob structure.
- Not orphaning and then bashing pouch joeys to death and leaving at-foot joeys to die without maternal care.
- Given the Code recommends the following inhumane method of bashing joeys to death, commercial shooting should not continue in Victoria- *"Hold the young firmly by the hindquarters (around the top of the back legs and base of tail) and then swing firmly and quickly in an arc so that the rear of the joey's head is hit against a large solid surface that will not move or compress during the impact (e.g. the tray of a utility vehicle)".* This method exposes joeys to fear, suffering and distress.
- 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", but the training and proficiency testing does not have any assessment for how to 'humanely' bash a joey to death, or how to euthanise at foot joeys.
- The KHMP must align with other relevant legislation such as the *'Prevention of Cruelty to Animals Act (1986)'* which is currently under review. The revised act recognises animal sentience, therefore sentient animals should not be subjected to pain or fear. The current KHMP causes joeys to feel fear, suffering and distress on a massive scale. In both 2021 and 2022, kangaroo shooters self-reported that more than 19,000 dependent joeys were killed as a by-product of the KHMP. This is an unacceptable number of cruel deaths that is at odds both with POCTA principles and society's expectations for how we treat wildlife.
- The treatment of kangaroos must be required to meet community standards. Continued inhumane slaughter of millions of kangaroos for profit is not consistent with community standards, nor does it comply with contemporary animal welfare science, ethics, conservation science, or national and international obligations. For example, nearly 5,000 written submissions were received on the revised National Code in 2020⁷. Most of the email

⁷ <https://agrifutures.com.au/wp-content/uploads/2020/11/20-081-digital.pdf>



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submissions from the general public expressed their opposition to commercial kangaroo killing, by arguing that no code of practice could ever address issues of inherent cruelty.

- Kangaroos are not killed humanely as highlighted in recently released eye-witness footage. All shooters should be using body cameras and rifle-mounted cameras with footage made freely available for public scrutiny.
- The Australian Government and the Kangaroo meat and skins industry have failed to follow the recommendations of the RSPCA in regard to the killing of females, and to this day the industry continues to slaughter a significant proportion of female kangaroos. In Victoria, approximately one third of kangaroos killed commercially are female.
- The current code does not prohibit the killing of female kangaroos with in-pouch or at-foot young, leaving joeys exposed to the cruelty of being bludgeoned, beheaded or left to die from starvation, predation or exposure.
- A government commissioned study⁸ into commercial shooter behaviour found widespread non-compliance with the national code by shooters, including the inability to effectively and quickly kill joeys with a single blow to the head, an unwillingness to search for young at foot joeys separated from their mothers, an unwillingness to shoot and kill orphaned joeys and instead a preference to leave them to flee. The code continues to leave hundreds of thousands of kangaroos and their joeys exposed to unacceptable cruelty, including kangaroos in Victoria.
- The Code of Practice requirement to kill kangaroos with a headshot that 'destroy[s] the vital areas of the brain' is inadequate as the neck can be severed close to the shoulders, removing evidence of kangaroos shot in the face and neck. Field studies of heads left by commercial shooters in NSW have shown approximately 40% of kangaroos would not have been killed with a single shot to the brain.⁹ Other wild 'game' animals are delivered to chillers with the heads attached, which should be a requirement of the KHMP, if authorities were to accurately gauge how many kangaroos are being killed according to the Code. However, even this would not capture kangaroos left wounded in the field or joeys left orphaned.

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 only ethical and responsible target is the immediate abolition of the commercial kangaroo industry in Victoria and a focus on respectful and ethical coexistence with wildlife.

⁸ <https://agrifutures.com.au/wp-content/uploads/publications/13-116.pdf>

⁹

<https://www.parliament.nsw.gov.au/lcdocs/submissions/72052/0404a%20Ms%20Dianne%20Smith%20and%20Mr%20Greg%20Keightley.pdf>



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- The target goals indicate that 100% of new shooters will hold a firearms proficiency accreditation. There is no mention of this same requirement for existing shooters. Whilst the 'conditions of authorisation' requires that all commercial shooters have this, the KHMP target is only to regulate new shooters.
- The target goals indicate that 100% of new shooters will have completed a recognised Game harvester competency program. There is no mention of this same requirement for existing shooters. Whilst the 'conditions of authorisation' requires that all commercial shooters complete this, the KHMP target is only to regulate new shooters.
- The target goals indicate that 100% of new shooters will have a valid firearms licence. Most alarmingly, there is no mention of this same requirement for existing shooters! Whilst the 'conditions of authorisation' requires that all commercial shooters have this, the KHMP target is only to regulate new shooters.
- 'Harvesters' are required to 'Comply with the code'. There have been years of evidence that self-regulation in this industry does not work, yet there is no explanation of how this compliance will be monitored or enforced in the future.
- If welfare is the 'highest priority' what is the justification for basing the industry around an unenforceable Code that enshrines cruelty to dependent joeys as standard practice?
- The concept of wildlife trade is incongruent with animal welfare. Killing wildlife for financial gain incentivises profit, not welfare.
- Stating that 100% of reports of non-compliance will be investigated is misleading. Investigations rarely occur in real time, so the ability to follow up relies on the 'evidence' of shooter identity collected by residents. Since kangaroo shooting occurs in darkness, the ability of members of the public to obtain evidence of a high enough quality to enable follow up is unlikely. Without widespread, regular monitoring every night across the entire state, this target is meaningless and unactionable.

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?

- Given commercial shooting happens at night, the National Code of Practice that is meant to apply to the commercial industry in Victoria is impossible to effectively enforce – meaning **there is no oversight**. Poor (and cruel) shooting behaviour is only reported by eyewitnesses,



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usually neighbours or members of the public. Licences are not enough. The KHMP should be required to develop a more effective method of enforcement and regulation without which it cannot proceed. Therefore, it is futile and expensive to waste taxpayer dollars on bureaucrats developing written regulations that are absolutely unenforceable in the field, until this methodology is developed.

- There must be a requirement to prioritise community health and expectations. There is no point wasting taxpayer dollars on adaptive management research for an industry that is risking community health whilst actively destroying our natural heritage and international reputation.
- There is no oversight or reporting of mis-shot and wounded animals who are not killed outright, including dependent young who are orphaned as a result of commercial shooting. Many adults and joeys endure pain, suffering, distress and death, and this goes unmonitored. Just how many kangaroos are injured or orphaned and left to die is unknown. The KHMP should be required to develop an accurate, verifiable and enforceable method of collecting data on mis-shot, wounded and orphaned animals. This data is crucial for evaluating the plan's progress and for future decision making. Without this data the KHMP cannot proceed.
- Independent, annual cost benefit comparisons of the KHMP must be conducted. The scale and extent of animal suffering and community distress¹⁰ inherent to commercial kangaroo shooting is significant and outweighs the potential commercial gains. Evidence of this must trigger an immediate cessation of the program.
- The Code does not adequately address wounding. 'Every reasonable effort' is ambiguous wording, and there is no commercial incentive to retrieve injured macropods. Punitive measures must be introduced to disincentivise apathy towards wounded animals.
- The requirement to hold appropriate licences is indicative only of a person's ability to do their paperwork and not of their ability to comply with guidelines, codes of practice or any form of ethical behaviour, therefore it is not of use in regulating behaviour. There is currently no requirement for how the KHMP will be monitored to ensure compliance with regulations.
- In the process of licencing commercial shooters, 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)

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

No

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

¹⁰ https://img1.wsimg.com/blobby/go/a5643baa-d4d8-4ba8-988b-7006e9477449/downloads/Anderson_Kyahl_Human_Harms_of_Kangaroo_Killing.pdf?ver=1687409978113



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- The only ethical and responsible target is the immediate abolition of the commercial kangaroo industry in Victoria and a focus on respectful coexistence with wildlife.
- 100% of program reports are made promptly available to the public.
- Licences are a starting point not an end goal. Regular unannounced compliance checks must be conducted in the field with each shooter being visited a minimum number of times as well as providing continuous footage of their activities. Spot checks should be financed by operators under the KHMP, not taxpayers. There should be a no tolerance policy for non-compliant behaviour by shooters.
- There needs to be a system for shooters to acknowledge reading and understanding of changes to authorisations and conditions. 100% of commercial shooters must have submitted receipt and understanding of these changes before participating in the KHMP.

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?

- There is a **complete and unacceptable lack of regulatory oversight** and enforcement given commercial shooting occurs at night in remote areas. The KHMP should be required to develop a more effective method of enforcement and regulation without which it cannot proceed. The taxpayer should not be required to foot the bill for the management of commercial kangaroo shooters.
- The commercial industry is entirely self-regulated. Data provided on numbers of animals shot is completely self-reported. The KHMP should be required to develop an accurate, verifiable and enforceable method of collecting data on shot animals. This data is crucial for evaluating the plan's progress and for future decision making. Without this data the KHMP cannot proceed.
- Public perception is that commercial harvesters are regularly audited and monitored in the field, but this is false. The reality of the KHMP must align with community expectations.
- There is no way of enforcing the Code of Practice. Plus, the Code acknowledges that wounding occurs, that the humaneness of bashing joeys depends on the skill of the shooter, and that at-foot joeys often flee and can experience 'considerable suffering' without their mothers. The KHMP finds this level of cruelty to be acceptable. The KHMP should be required to develop an effective method of addressing the welfare issues inherent in the Code of Practice, without which it cannot proceed.



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There is currently no requirement to demonstrate that educational materials have been read and understood by shooters. A written test, as well as a declaration of having read the material and a signed agreement to comply with all codes must be developed before the KHMP can proceed.

- There should be a requirement for transparent data on the number of kangaroos killed with a compliance officer present. Compliance data in annual reports is inscrutable as it refers to only 'active harvesters'. The requirements for what constitutes an 'active harvester' has changed from a shooter who kills more than 700 kangaroos per year (in 2020) to a shooter 'who records an annual take equal to, or more than the state-wide mean' (from 2021). There is no data publicly available on how many Victorian commercial kangaroo shooters are considered 'active' in Victoria in any given year.
- Accredited shooting courses must be evaluated independently and should accurately reflect worst case conditions in the field, e.g., dark, windy and raining.
- There is no mechanism or requirement to advise neighbouring residents of an impending shoot, leading to inevitable safety risks, terror and distress for other locals. Similar to the advertising and objection process for development and building works, there must be a process of announcing and advertising any planned shooting to nearby neighbours and businesses with sufficient time allowed for their feedback, Objections must trigger a hearing process similar to VcaT.
- It is virtually impossible for residents to have kangaroo shooters prosecuted as few people have the technology to film the shooting which occurs at night. The KHMP should be required to ensure enough compliance officers are in the field that they can respond in sufficient time to apprehend wrong doers, thereby helping keep residents safe. To facilitate this, a site registration process must occur. Without adequate staffing for this oversight, the KHMP cannot proceed.
- The sheer scale of the industry and the mobility of kangaroo populations make it difficult to ensure compliance with regulations and to detect and address any violations. Any efforts to address this issue – whether stricter regulations, enhancing transparency, investing in improved monitoring technologies, and promoting dialogue between stakeholders – cannot ensure ethical practices in an industry that operates remotely in the cover of darkness.

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 only ethical and responsible target is the immediate abolition of the commercial kangaroo industry in Victoria and a focus on respectful coexistence with wildlife.
- After distribution of educational material, 100% of active shooters must have demonstrated their understanding of the material by passing a comprehension test.



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- The results of Pet Meat Processing Facility and Game Meat Processing Facility audits are available for public scrutiny, within a predetermined and expedient timeframe. There will be a zero tolerance approach to non-compliance with any safety, cruelty or hygiene practices.
- The results of licensed field depot and harvest vehicle audits are available for public scrutiny, within a predetermined and expedient timeframe. There will be a zero tolerance approach to non-compliance with any safety, cruelty or hygiene practices.
- Requests for information from members of the public are subject to the same response times and quality as those from governmental agencies, 100% of the time.
- If community objections are received, 100% of responses will be investigated and actioned, with timely feedback to the complainant.
- Body and rifle mounted cameras for all shooters, with footage made available to the public.

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 should be evidence that the community actually supports spending taxpayer dollars on adaptive management research for an industry that is risking community health whilst actively destroying our natural heritage and international reputation.
- Independent oversight is required to ensure that the stated aims of the KHMP are being adhered to and that the program is not being run in contravention of these aims to instead meet the needs of shooters. Despite widespread and ongoing community concerns and evidence of the failings of the law to prevent suffering caused by the commercial kangaroo shooting industry, the government persists with its support of the industry. This directly contradicts the Department's objective of facilitating adaptive management and research.
- Data collection is currently insufficient to accurately inform an annual review of the KHMP by DELWP. The KHMP should be required to develop an accurate, verifiable and enforceable method of collecting data on kangaroo abundance, kangaroos killed or left to die and all other aspects of the program. This data is crucial for evaluating the plan's progress and for future decision making. Without this data the KHMP cannot proceed.
- There is currently no explanation for how changes to the program will be identified and captured, there must be a requirement to clarify the framework for this and the actions to be taken, and how updated information will be communicated to shooters, stakeholders and the public.



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- There is no explanation for how research opportunities will be evaluated and decided upon. This could open the program to only participating in biased or self-serving opportunities. All Research opportunities should be evaluated by an independent committee and there should be quotas set for the types of research undertaken to ensure breadth and depth of knowledge gained.
- Information and knowledge gathering opportunities should be equally pursued by the department with both those stakeholders who oppose and who support the KHMP.
- The methodology for surveying kangaroo abundance must be urgently subject to independent review. Past surveys have produced figures that are incongruous with community observations, and often biologically impossible. Whilst flawed population survey methods are in use, the community can have no confidence that commercial exploitation is not threatening the species.
- Population surveys must have a mechanism to understand impact of shooting on mob dynamics, such as joeys not playing, no alpha to regulate breeding, lack of mature adults etc. Research that fails to capture impacts on mob structure and success will not accurately gauge the health of the species.

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 only ethical and responsible target is the immediate abolition of the commercial kangaroo industry in Victoria and a focus on respectful coexistence with wildlife.
- Aim to redirect research funds towards supporting coexistence, wildlife road safety and ecotourism opportunities.
- There must be a rigorous process to ensure changes to the program have not only been sent to shooters, but received, understood and actioned. The process must include steps to verify this, such as comprehension questions to demonstrate understanding of amendments to the program.
- To provide accurate data, the KHMP should also be able to capture 100% of kangaroos that are wounded and lost, and young at-foot that flee with slim chance of long-term survival.

6. Maintain openness, accountability and transparency.

Is this objective being met?

No

Are the requirements for meeting this objective appropriate?



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No

What other requirements might be needed to meet this objective?

- The requirement to transparently provide data to the public cannot be met when the data doesn't exist. For example, there is no data collected on the number of kangaroos actually killed under the ACTW system so there can be no accurate overall picture of combined commercial and non-commercial kangaroo killing in the state. Furthermore, there are gaps and discrepancies in the KHP data, including no data on average body weights and minimal data on compliance, that further obscure the reality.
- The KHP is organised in such a way that it is extremely convoluted between a number of departments and authorities, making it extremely difficult for members of the public to get answers about the program. For example:
 - It is very difficult to obtain fully transparent information about how kangaroo population survey methodologies are calculated.
 - It is very difficult to obtain data on the specific location of permits granted under the KHMP, making the safety and security of landholders who oppose shooting in their immediate proximity impossible to predict.
 - It is very difficult to obtain information on human safety issues, such as how far shooters must be from boundary fences, stables, farm animals etc.
- All relevant Information should be easily accessible for average members of the public with minimal computer skills.
- For full 'openness and accountability', the KHMP would need to offer a community contact centre staffed 24 hours a day, 7 days a week, with sufficient staffing of officers available to respond to incidents immediately, investigate and take action. The resourcing and financial costs to provide this are potentially prohibitive and should not be borne by the taxpayer, but anything less is inadequate.
- Requests for information by members of the public should have the same requirements and carry the same weight as requests from media sources.
- The implementation of a Wildlife Trade Management Plan (WTMP) is not in line with societal values and expectations; most Victorians value wildlife and abhor dangerous wildlife trade practices. Any plans to act counter to this requires extensive consultation with the community.
- The comments, recommendations and outcomes of any stage of the review process must be transparent and the managing departments held accountable. The criteria by which reviewing 'peers' are chosen must be transparent and readily accessible, and must include a requirement of independence.
- The KHMP Tries to present itself as a necessary way of managing kangaroo populations, however kangaroos don't need to be managed, when left alone nature 'manages' itself. Indeed, kangaroos have been managing their own populations for 20 million years, mostly without a major top-down predator. This is a commercial enterprise based on killing off native wildlife at an alarming rate. The plan needs to be clarified and renamed to reflect its



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true goals and objectives, for example, it could be rebranded as the 'Kangaroo Eradication for Profit and Convenience Plan (KEPCP)', and then evaluate the level of social licence it receives.

- The introduction of mandatory consultation and approval from neighbouring properties, to enable the ability to oppose the operation of commercial and non-commercial shooting in their immediate surroundings, should they wish.

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 only ethical and responsible target is the immediate abolition of the commercial kangaroo industry in Victoria and a focus on respectful coexistence with wildlife.
- 100% of program reports are made promptly available to the public.
- There should be a feedback process on ease of finding and transparency of documentation available. 100% of feedback must be responded to and problems resolved within a reasonable timeframe.
- Opportunities for stakeholder feedback on any aspect of the current, proposed or future KHMP must be widely advertised to local communities, via a number of methods, using both traditional and digital media and allowing sufficient time for feedback to be returned. If lower than a predetermined proportion of responses is received, the consultation time should be extended.
- A community contact centre must be staffed 24 hours a day, 7 days a week, 100% of the time. A 'traffic light' system for urgency of responses to callers must be established with maximum response times for each level and 100% of responses must meet their required response time.

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?



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- There should be a requirement to avoid causing cultural offence. Kangaroos are a Creator Spirit and Sacred Totem for many First Nations people, holding deep cultural significance. In light of this, the KHMP will inevitably cause distress to those who oppose the commercial killing industry as culturally offensive and/or as a vestige of colonial exploitation. These viewpoints should be formally recognised and respected.¹¹
- Similarly, whilst First Nations people are granted rights to hunt kangaroos under the '*Native Titles Act 1993*' for 'traditional purposes', the KHMP is a commercialised kangaroo killing industry and any attempt to appropriate the cultural practices of First Nations people as a justification for a profit-driven industry is abhorrent.
- For the benefit of all, there should be a requirement for the exploration of partnership opportunities between First Nations people, DEECA and DJSIR (formerly DELWP and DJPR) to celebrate kangaroos. When regional areas are safe from kangaroo shooters, ecotourism opportunities such as cultural education, walks and wildlife tours abound.

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 only ethical and responsible target is the immediate abolition of the commercial kangaroo industry in Victoria and a focus on respectful coexistence with wildlife.
- A publicly available registry of Aboriginal organisations that have been consulted. This should include evidence that they have been provided information that accurately represents the inherent welfare, sustainability and hygiene concerns, as well as the concerns of First Nations activists opposed to the trade. For example, have they been offered a copy of the Yuin Declaration for Kangaroos?¹²

Section 2.

Are the existing objectives sufficient?

No

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

- First objective should be to ban the shameful exploitation of ancient Totemic keystone kangaroos that are essential to our country and culture.

¹¹ <http://thinkkangaroos.uts.edu.au/issues/indigenous-perspective.html>

¹² <https://www.kangaroosalive.org/yuin-declaration>



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- Second objective should be to replace slaughter with active investment in respectful coexistence strategies and infrastructure for ethical and lucrative ecotourism opportunities.

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

- It is a disgrace that this wildlife trade was allowed to return to Victoria. Since the commercialisation of kangaroo slaughter, combined average quotas have more than tripled, and we have seen terrible ramifications for kangaroos, community members and wildlife volunteers.
- This cruel, dirty and unsustainable industry is totally unacceptable in a modern, progressive society. It is a national disgrace that exposes us to international censure and condemnation.
- The Kangaroo is a Creator Spirit and Sacred Totem for many First Nations people, holding deep cultural significance. In light of this, the KHMP will inevitably cause distress to those who oppose the industry as culturally offensive and/or as a vestige of colonial exploitation.

Conclusion

The KHMP is a thinly veiled excuse for the government to kill ever increasing numbers of kangaroos for profit. If you are enraged by reading the facts of this commercialised killing of our unique kangaroo species, then please use this consultation to condemn the KHMP.

The format of the survey is undoubtedly designed to put people off answering the questions, but we hope this guide will arm you with some facts you can use to speak up for kangaroos and to highlight the inadequacies and cruelty inherent in the KHMP. If it is still overwhelming, please reach out via email and we will try to help you find a way to help you to have your say.

Please reach out to Nat Kopas at advocacy@ajpvic.org.au or Alyssa Wormald at info@vickangas.org if you have any questions or would like to discuss further.

Thank you for being a voice for animals.