



Proposed Wildlife Trade Management Plan: Victorian Kangaroo Harvest Management Plan 2024-2028 Submission Guide

Introduction

Victorian kangaroos are being brutally slaughtered every night, for profit. They are in crisis, relentlessly terrorised and gunned down as part of the unethical, unsustainable and unhygienic kangaroo trade. Their bodies are used for pet food, human consumption, skins for 'k-leather', supplements, and body parts for macabre souvenirs. This is part of the world's largest mammalian wildlife trade. The accepted practices are cruel and unhygienic, the population figures are spurious, regulation and oversight is woefully inadequate, and the killing is causing great distress to many in the community. Despite this, the kangaroo industry is supported by revenue-hungry state and federal governments.

Earlier this year the Victorian Department of Energy, Environment and Climate Action (DEECA) commenced a review of Victoria's Kangaroo Harvest Management Plan (KHMP), seeking public feedback to inform the next plan which will underpin the commercial kangaroo trade starting in 2024. This plan is now in draft form and has been submitted to the federal Department of Climate Change, Energy, the Environment and Water (DCCEEW) as a 'wildlife trade management plan' (WTMP). DCCEEW is allowing a short period for public feedback on the draft document. For the purpose of this guidance we will refer to the draft KHMP/WTMP simply as 'the Plan'. Please also note that the word 'harvest' is used only to reflect the terminology used in the Plan. We believe this term is a grossly inappropriate euphemism.

The purpose of the proposed Plan is to ***'ensure the commercial harvest of *Macropus giganteus* (eastern grey kangaroo) and *Macropus fuliginosus* (western grey kangaroo) in Victoria is ecologically sustainable'***.

The commercial killing of kangaroos is not ecologically sustainable, and no amount of 'planning' will make it so.

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.



This consultation is your chance to speak up for our macropod friends and tell the government that kangaroos need protection, not 'management'; kangaroos are valued native wildlife, not a commodity to trade.

If possible, please take the time to read the full Plan, or you can simply use this guide to assist you in writing a response.

Kangaroos are counting on you to be their voice!

Consultation Details

To download the Wildlife Trade Management Plan, go to:

<https://www.dcceew.gov.au/sites/default/files/documents/vic-kangaroo-harvest-management-plan-2024-28.pdf>

The consultation seeks feedback on the the plan using the following headings:

1. Sustainability of the harvest
2. Monitoring
3. Quota setting
4. Licensing
5. Welfare
6. Other

Feedback is simply provided by writing a submission and emailing it to: wta@dcceew.gov.au

Your submission can discuss one, some or all of these headings, there is no minimum or maximum. However, if you have experience or knowledge of a certain topic it's best to focus on what you are passionate about! If you completed the KHMP review survey earlier this year and have your answers written down, you may find you can repurpose much of this work, as the issues with the commercial killing of kangaroos remain the same.

For more information, go to:

<https://www.dcceew.gov.au/environment/wildlife-trade/comment/vic-kangaroo-harvest-management-plan-2024-28>

The consultation closes at 5pm on **Monday, 11th December 2023**



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 as individual submissions. Select whichever point(s) are most important or meaningful to you, and use them as inspiration to write your own response.

1. Sustainability of the harvest

Harvest Zones

Whilst the so-called 'harvest zones' (where commercial kangaroo killing occurs) will stay the same in 2024, there are changes proposed from 2025-2028. The current 7 zones plus 1 exclusion zone will become 5 zones plus 1 exclusion zone, with the important addition of ten new local government areas to the exclusion zone.

From 2025, the Exclusion Zone (no commercial shooting, 'Authority to Control Wildlife' permits only) is proposed to include the following council areas:

Banyule, Bayside, Boroondara, Brimbank, Cardinia, Casey, Greater Dandenong, Darebin, Frankston, French Island, Glen Eira, Hobsons Bay, Hume, Kingston, Knox, Manningham, Maribyrnong, Maroondah, Melbourne, Melton, Monash, Moonee Valley, Mornington Peninsula, Merri-bek, Nillumbik, Port Phillip, Queenscliff, Stonnington, Whitehorse, Whittlesea, Wyndham, Yarra.

Whilst some of these are obvious inner city localities with few (if any) kangaroos, the new additions, such as Melton, Nillumbik and Mornington Peninsula are on Melbourne's fringes and represent areas where kangaroo populations are under strain from urban development and habitat destruction.

Undeniably, there should be no kangaroo shooting, but the new exclusion zones should be encouraged as an interim measure that protects at least some kangaroos, whilst we continue the fight to permanently abolish this commercial wildlife trade.

The plan does not state reasons for the new exclusions but a likely consideration is the desire to keep the killing out of more populated areas and therefore out of sight. Under the current plan, there has been a lot of outcry from communities horrified by the killing of local kangaroos, including residents who have witnessed the shooting or the aftermath. No doubt the government is keen to avoid further bad publicity in the future.

However, if the exclusion zones have been extended in recognition that kangaroo populations in these areas are under stress, and/or that shooting in these areas poses a risk to human residents, then why wait until 2025 to implement the new exclusion zones? Shooting kangaroos in regions like these risks human safety and localised extinction. If this Plan is implemented, then these exclusion zones need to be recognised in 2024, as soon as this plan commences.



Population Figures

- 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. Biologically impossible rates of population increase reported by the government that profits from their slaughter cannot be trusted.
- 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.
- There have been no studies on the longer term impacts of destroying kangaroo families and communities. We may be doing untold damage to the long-term viability of the species by removing the largest and fittest adults from the population.
- 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.
- 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 suspending the 'harvest'. This vagueness and lack of clarity around ongoing monitoring systems erodes any claims of sustainability being the goal.

Kill Quotas

- Despite the kangaroo industry benefiting from misconceptions about kangaroo populations, the truth is that kangaroos are being slaughtered purely for money – fuelled primarily by the international trade in kangaroo leather and meat products. The combined average kill quotas have more than tripled in Victoria since commercialisation.
- This is despite basic kangaroo biology which demonstrates that kangaroo populations did not and cannot triple in that same time frame, therefore either population estimates are incorrect, or kill quotas are not determined using sound scientific principles.
- The Victorian Government is using outdated criteria for what constitutes 'sustainable'¹ 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.

2. Monitoring

Regulation

- The KHMP lacks transparency. Regulatory documents are useless in practice, as the trade 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,

¹ Coughley et al. 1987; McLeod et al. 2004



but as most do not have equipment to film at night it is challenging to gather sufficient evidence.

- Data provided on numbers of commercially killed kangaroos is completely self-reported and therefore unreliable and it is irresponsible to use this data to guide future decision making .
- The Plan does not stop a commercial shooter from extirpating kangaroos from a given area provided they have the 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 is insufficient monitoring to prevent this from occurring, making itis an unacceptable risk that cannot be adequately mitigated.

Compliance

- Public perception is that commercial harvesters are regularly audited and monitored in the field, but this is false. The reality is that there is virtually no oversight in the field, and no way of knowing what is endured at the point-of-kill.
- 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.

3. Quota setting

- There are currently no reliable methods of accurately gauging kangaroo abundance, as government surveys are based on extrapolating data from small aerial transects. The program cannot claim to be sustainable when they are basing their quotas on incomplete and unreliable data.
- 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 Plan is inevitably killing kangaroos at a faster rate then they can breed.² If the precautionary principle were truly being applied, the kangaroo industry would be abolished.

4. Licensing

- 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. Given there is virtually no oversight in the field, licensing is essentially redundant.

² <https://www.kangaroosatrisk.org/biology.html>



- 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)

5. Welfare

The concept of wildlife trade is incongruent with animal welfare. Killing wildlife for financial gain incentivises profit, not welfare.

Joeys

- The national Code of Practice includes the bashing of in-pouch joeys – considered a waste product. The Code notes the correct method is difficult and depends on the shooters' skill to bash the correct part of the joey's head.
- The Code recommends the following inhumane method of bashing joeys to death: *"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 Code also requires dependent at-foot joeys to be euthanised as a waste product, but it acknowledges they are difficult to shoot and that welfare outcomes for escapees will likely be poor. Indeed, many escape to die slowly from exposure, starvation and predation, calling for their mothers.
- The Plan requires shooters "to demonstrate minimum standards of competency set out in the National Code prior to receiving authorisation to harvest under the KHMP", but the training and proficiency testing does not have any assessment for how to 'humanely' bash a joey to death, or how to euthanise highly mobile at-foot joeys.
- A government commissioned study³ 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 euthanise 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.

Wounding

- Kangaroos are regularly wounded and die slow, painful deaths with limbs and jaws blown apart etc...
- 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

³ <https://agrifutures.com.au/wp-content/uploads/publications/13-116.pdf>



shooters in NSW have shown approximately 40% of kangaroos would not have been killed with a single shot to the brain.⁴

- Residents in areas where commercial shooting of kangaroos takes place are increasingly being left to seek help for kangaroos who have been horrifically 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. Wildlife Victoria has reported a 55% rise in kangaroo wounding and 500% rise in orphaned joeys since commercialisation. This is indefensible.

Community expectations

- 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 KHMP is currently exempt from complying with the '*Prevention of Cruelty to Animals Act (1986)*' (POCTAA). POCTAA is currently under review with the revised Act recognising animal sentience, and the need to protect sentient animals from pain and fear. The revised Act better aligns with contemporary societal expectations, and the treatment of kangaroos should not be exempt from these standards. Compliance with the revised Act would render the kangaroo industry unviable as the Plan inevitably inflicts fear, suffering and distress on a massive scale, both to joeys and the adults who are terrorised and left wounded.
- 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 2020⁵. Most of the email 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.

6. Other

- 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 Plan 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.⁶
- The kangaroo trade is destroying an animal that is internationally recognised and essential to many ecotourism businesses. The government would be wise to focus on developing this lucrative and sustainable industry instead of a cruel and archaic wildlife trade.

⁴ <https://www.parliament.nsw.gov>.

[Bymissions/72052/0404a%20Ms%20Dianne%20Smith%20and%20Mr%20Greg%20Keightley.pdf](https://www.parliament.nsw.gov/bymissions/72052/0404a%20Ms%20Dianne%20Smith%20and%20Mr%20Greg%20Keightley.pdf)

⁵ <https://agrifutures.com.au/wp-content/uploads/2020/11/20-081-digital.pdf>

⁶ <http://thinkkangaroos.uts.edu.au/issues/indigenous-perspective.html>



- The industry causes major distress to wildlife rescuers, carers, advocates and all who care about animal welfare. Many Victorians are fearful that shooters will be stalking their neighbourhood and killing beloved local mobs.
- The kangaroo trade is highly unhygienic. Carcasses are field dressed with little to no sanitary precautions and are driven around all night in any heat covered in dust and insects with mixed wild species crammed together on the back of open utes. According to the CDC, 75% of new or emerging diseases are zoonotic in origin and the unsanitary conditions and cross-contamination poses a serious pandemic risk.
- Kangaroo meat is not healthy. It contains a high incidence of parasites, toxoplasmosis, e-coli, salmonella and other pathogens, as well as dangerously high levels of L-Carnitine, a compound linked to heart disease, stroke and heart attacks.
- Imports of kangaroo have been banned in Russia and California and many companies are rejecting this ethically/environmentally/hygienically questionable trade. There are major international campaigns against kangaroo products.
- There were over 700 responses from the public to the initial KHMP survey. Why has there been no report on the outcome of this community feedback?
- The only ethical and responsible move for both the Victorian and federal governments is to immediately abolish the commercial kangaroo industry in Victoria and a focus on respectful coexistence with wildlife.

Conclusion

The Plan is a thinly veiled excuse for the government to inhumanely kill ever-increasing numbers of kangaroos for profit. If you are enraged by the horrific reality of kangaroo exploitation, please use this consultation to strongly condemn the Plan. The Plan should be rejected in its entirety and the kangaroo industry abolished.

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.