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The Director - Wildlife Trade Assessments
Department of Climate Change, Energy, the Environment and Water
GPO Box 3090
Canberra ACT 2601

Monday, 11 December 2023

Dear Director,

**RE: Invitation to comment—Proposed Wildlife Trade Management Plan:
Victorian Kangaroo Harvest Management Plan 2024-2028**

The Victorian Kangaroo Alliance Inc. (VKA) brings together communities, wildlife experts (organisations, vets, rescuers, carers and advocates), Traditional Owners, wildlife-friendly politicians and councillors, media, animal welfare organisations and direct-action animal defenders to protect Victoria’s Kangaroos.

VKA believes the case against free-ranging kangaroos in Victoria for ‘harvesting’ has never been strong. It relied on a presumption that they need to be ‘managed’ (a popular euphemism to avoid the honest language of ‘being killed’) which has been founded on historical biases (“they’re in plague proportions”, “they compete with livestock for food and water”, “they damage fences”) conferred over generations by landholders aggrieved by their presence and cemented into popular culture.

Most recently these have been echoed and amplified by those who seek the growth of an Industry premised on their slaughter, motivated by profits from supplying meat for pet food *inter alia*.

Dismissing the historical biases and fallacious stories of ‘plagues’¹ and ‘grazing pressures’^{2,3} that underpin this program, it is in the interest of the Victorian public to be able to understand why this native animal—which has lived in harmony with this country’s ecosystems for 20 million years⁴—has been singled out for slaughter on a mass scale.

Victorians are still awaiting a satisfactory answer from DEECA to this and other pivotal questions.

We therefore urge Federal regulators not to consider the application for its Kangaroo Harvest Management Plan 2024-2028 a *lay down misère*, a formality to simply ‘tick off’ DEECA as compliant, based on pre-existing anchoring biases, while many unresolved issues exist.

Below are our responses to key points of consideration of its application.

1. Sustainability of the harvest

‘Sustainability’ is a term that is commonly used to imply environmental responsibility, a necessary requisite for social licence and to convey the impression that there is a self-replenishing resource that can be extracted without a harmful environmental impact.

This term, and others like it, has been recently scrutinised in the Federal Government’s Greenwashing Inquiry as a marketing tool that has been used to mislead consumers and assuage community concerns, expectations and standards.

Insofar as the Victorian Kangaroo Harvest Program (KHP), ‘sustainability’ is yet to be demonstrated as the program is premised on assumptions, modelling and simulations, informed by limited data collection through the use of aerial transect surveys which only provide a snapshot of kangaroo populations. Results are then extrapolated to provide a number that implies *over-abundance*, through harvest regions.

In its most simple iteration, ‘sustainability’ invokes the financial notion of ‘principle’ and ‘interest’, with slaughter being conducted on the ‘interest’ component.

In doing so, it assumes that over-abundance is a ‘steady state,’ and that kangaroos are a seemingly inexhaustible resource to be exploited.

In this case however, the analogy fails as the ‘principle’ component of the overall population is only a mathematical prediction, with DEECA and ARI disinterested in ascertaining its actual magnitude through rigorous field-based evaluation. With that knowledge-gap obfuscated within a technical process, it asserts that 10% of the predicted population for killing is conservative in comparison to other States.

However, year-on-year, the quota (ie. number to be slaughtered) has been increased by DEECA while the *take* (ie. kangaroos that are killed and tagged by licensed shooters), continues to **decrease**, well under what the conservative 10% allocation that is available to them.

For example, in 2022 the total quota of kangaroos allocated to the KHP was 118,980; only 68,346 (~57%) were slaughtered. ⁵

DEECA’s explanation of this 43% shortfall is

“As in 2021, harvesters did not use the full quota allocation available to them. The use of quota varied greatly between harvest zones. Statewide, just over half (57%) of the available quota was used.” ⁶

However, in the real world, ‘harvesters’ (licensed shooters) have been seeking more income than what is available to them through standard KHP applications. This is evidenced by them spruiking extensively via various media channels their ability to remove kangaroos via the KHP **for free and without** landholders needing a permit. ⁷

Ergo, it can be seen that, despite the financial incentive, licensed shooters are **not finding enough kangaroos to shoot through the KHP** despite the larger permitted quota which might make their business more viable.

If the Precautionary Principle was honestly being followed by DEECA, as it states in the KHP ⁸, this observation should serve as a red flag and a reason to circle back to its initial assumptions, questioning the reliability of the overall population modelling.

Assigning blame to the ‘harvesters’ for not attaining the quota seems scientifically lazy and a deflection of its responsibility to understand this result.

The aforementioned points are not indicators of a ‘sustainable harvest’ and the credibility of the Victorian KHP is highly questionable.

Concerned Community members are all-too-readily admonished to ‘trust the science,’ dismissed outright or blatantly ignored, while authorities, blindly immersed in a sunk cost bias, exclude any consideration of real-world evidence that points to a significant problem.

2. Monitoring

To date, monitoring of kangaroo shooters in the field has been woefully inadequate.

In its plan, DEECA expresses the aspiration for providing random overnight audits for licensed shooters by Authorised Officers ⁹. While shooters do log with DEECA the locations in which they intend to work, its expectation to improve monitoring is grossly inflated.

How many DEECA staff assigned to this enforcement role would it take to achieve effective monitoring and to ensure sufficient behavioural compliance by shooters? This is a calculus that is not yet determined and, for the purpose of this plan, cannot be regarded as credible.

Applying a variation to an established public sector role, that is, working overnight in remote locations where firearms are being discharged, has Industrial and Occupational Health & Safety implications for DEECA staff which are yet to be determined and will be subject to protracted negotiations with the relevant union. Such a variation would invariably attract overnight shift penalty rates at the very least.

Can DEECA be serious in believing that the State Treasurer would sign off on such an expense during an unprecedented period of budgetary cuts across the Victorian Public Sector, driven by pandemic-related cost blowouts?

As an established workforce, Victoria’s Game Management Authority (GMA) does not have a credible monitoring record even if it was delegated the role of Authorised Officers. It was revealed in a 2023 Parliamentary Inquiry that its staff, comprising predominantly members of the shooting community, do not have the capacity or inclination to monitor the behaviour of shooters—their peers—involved in currently legal hunting activities ¹⁰. A proposition seeking to add an overnight shift-working burden to its field staff would no doubt make this even less likely to be implemented.

Improvements to monitoring appear only to remain an aspirational goal, and highly doubtful that it can or will be achieved as part of the suite of proposed quality improvements contained in DEECA’s KHMP.

3. Quota setting

The Arthur Rylah Institute (ARI)—the scientific wing of DEECA, which designed the survey methodology six years ago ¹¹—provided a non-peer-reviewed structure from which the harvest program was to be conducted.

By its own admission

“There are a large number of unknown quantities that need to be considered in any assessment of the performance of alternative sampling designs. In particular, the assessment of any specified survey design requires that assumptions are made about the likely abundance of each species of kangaroo in each spatial unit for which an estimate of abundance is desired. It is also necessary to make assumptions about the likely performance of the line-transect survey method.” ¹²

and yet assumptions that seem obvious have been **excluded** from consideration. Instead, the pattern of behaviour of its authors, observable throughout its relevant publications, seeks to fortify the methodology in subsequent iterations, rather than question its preliminary assumptions.

An example of an incorrect assumption can be seen within its own survey design document, which states

“Parts of the state covered by dense forest cannot practically be surveyed for kangaroos from the air, as kangaroos cannot be reliably detected from the air in thickly forested habitat...”

...the presence of unsurveyed kangaroos in forested habitat means that the overall population estimates derived from the proposed survey designs presented here will be biased low.” ¹³

And yet, subsequently it states:

“...As aerial surveys for kangaroos are typically conducted around dawn and dusk, an east-west orientation means that the observers will be facing to the north and south, and therefore will not have to observe kangaroos while facing into the glare of the rising or setting sun.” ¹⁴

We would caution though that, as surveys would ideally be done close to dawn and dusk (when kangaroos are most active and observable)...” ¹⁵

So, kangaroos are best surveyed between dawn and dusk, when they can be clearly observed in grazing behaviour *outside of forested habitat*. This is uncontroversial and entirely consistent with their established behaviour during these times of day.

However the proceeding statements are contradictory by asserting that there is a cohort of unsurveyed kangaroos that *cannot be detected in forested habitat*.

At dawn and dusk **there are no or few kangaroos in forested areas**; this is the time they spend grazing in the open. This is when surveys are conducted; the number aerial observers see will mostly be what there are in the field.

It follows that the statement

“...population estimates derived from the proposed survey designs presented here will be biased low”

is false; **results will instead be skewed to appear larger than they actually are.**

And so this minor point—contradictory positions conflated by trusted people of science, no less—plays well into the widely propagated mythology that *“for every one kangaroo you see in the open, there ten more in the forest”*, validating the ongoing bias toward the belief in over-abundance.

It follows that if the methodology is based on flawed assumptions, such as the aforementioned, any action to seek improvements to its accuracy (eg. increasing the number of aerial transects) will simply amplify fallacious results.

Another great concern to the supporters of the VKA is that the methodology does not seek corroborating data to include in its modelling of kangaroo population abundance. For example, deaths of kangaroos due to road trauma are commonplace for those who use rural and semi-rural roads, and represent a factor which applies downward pressure on populations.

Within the geographical boundary of its membership across eastern states, motor vehicle insurer NRMA reported death of kangaroos and wallabies due to road trauma alone ¹⁶ to be approximately 5 million in 2022, a magnitude suggesting cars contribute a significant role in mortality.

This external metric is knowable and would be relatively simple to include in population abundance predictions by seeking ‘Hit By Vehicle’ data from motor vehicle insurers in Victoria (realising that even these incidents would under-reported due to the use of bull bars for which no damage claims are submitted).

But DEECA and ARI, having stated that

“There are a large number of unknown quantities that need to be considered in any assessment of the performance of alternative sampling designs...”

do not consider it of significance to grey kangaroos, but only to endangered macropod species, **which are already excluded from ‘harvesting.’** ¹⁷

In addition there has been no consideration of endemic infectious diseases which contribute to kangaroo mortality. Researchers in NSW have recently identified *Babesia macropus* as a pathogen that has a significant impact on eastern grey kangaroo populations and recommended further research.¹⁸ Once more, this would be a simple haematology screening process at the harvesting or processing interface, but the indifference of the authority prevails.

In these responses, DEECA and ARI reveal a reluctance to answer the concerns over the potential impacts to grey kangaroo populations due to a significant, measurable and recurring causes of mortality. It is another example of entrenched thinking that ignores available evidence.

4. Licensing

While seeking to establish standards of practice and accountability is a well-rehearsed, stepwise process, licensing does not guarantee high level accuracy or an absence of suffering in the KHP.

Irrespective of their proficiency when shooting static targets in controlled daylight conditions, when shooting small targets (ie heads) that move at night, in all weather conditions, shooters' results are far less certain.

Evidence of significant inaccuracy is discussed further under 'Welfare' below.

The Community has every right to remain skeptical about the assurances of licensing.

5. Welfare

DEECA certainly has no role in monitoring the behaviour of shooters and any perverse incentives by which they are motivated, such as payment based on kilogram per carcass, favouring the selection of alpha males over females and smaller juveniles. Such selections have the capacity to disrupt mob social structures and predictable reproductive cycles.

Animal welfare for kangaroos is defined by the National Code of Practice which articulates how to kill them while simultaneously asserting the claim that this conforms to the notion of being 'humane.'

In-pouch joeys found at scenes by shooters are to be subject to decapitation or blunt force head trauma. Curiously, this process is sanitised by reframing it as 'euthanasia.'¹⁹ But this is not a procedure that is taught or tested and relies entirely on an individual's 'skill' and determination.

Those joeys that flee the scene of their mother's death invariably suffer poor welfare outcomes.²⁰

Would it not better meet community expectations for orphaned joeys to be recovered at the scene and, rather than being killed by 'harvesters', surrendered to local rehabilitation services, where already many that are orphaned by road trauma are nursed to an age where they can be 'soft-released' back into the wild? This is an uncontroversial and established practise that is currently supported by the State Government, overseen by wildlife agencies. This would also require that that DEECA provide resource support to these services, in line with community expectations, if it is going to create these orphans as a consequence of conducting the KHP.

In addition, the real world, once again, reveals contrasting evidence on the success rate of shooting kangaroos and the claim that using licensed harvesters guarantees an instantaneous death. The GMA even acknowledges in its education to shooters that wounding is a reality when hunting larger animals.²¹

Similarly, the Code of Practice also admits that wounding and suffering, despite the employment of licenced shooters, is to be expected.²²

A forensic analysis submitted to the 2021 *NSW Inquiry into the Health and wellbeing of kangaroos and other macropods* ²³ found that approximately 40% of shots from by licensed shooters were not headshots (ie. they were neck and body shots) and did not result in instant death, but inflicted catastrophic wounds from which animals would suffer in agony at either the scene or elsewhere after fleeing, and die over subsequent days.

Consistent with this finding was a revelation in Victorian Parliament recently that Wildlife Victoria has experienced a 55% increase in requests to attend kangaroos with such gunshot wounds (including non-fatal open facial fractures and avulsions) inflicted by licensed shooters since the KHP began.

For a reasonable person, these data are hard to dismiss as outliers. The burden of proof for claims of abhorrent animal suffering resulting from the brutality of the KHP is readily available to regulators and agencies.

Why then, is DEECA's reaction an all-too-familiar one: persist with the mantra of 'animal welfare is our priority,' ignore the evidence, fail to act and continue with the KHP as 'Business As Usual'?

ARI has no role to ensure animal welfare insofar as the KHP; it is, in fact, ***an enabler of animal cruelty***, while maintaining a safe reputational 'arms length' to what is actually being perpetrated and documented in the field.

The public only sees obfuscation and an apparent reluctance to call into question the program as the responsible agency chooses to perpetuate a bureaucracy-wide 'sunk cost bias.'

Within the scope of wildlife intervention and in the domain of kangaroos, DEECA fails to adhere to the standards contained in its own Community Charter ²⁴, namely:

Honesty and transparency: Be honest about what's driving our priorities, what we can and can't promise to do, our timelines and why decisions have been made

Clarity and purposefulness: Be clear about why and how we are engaging, making sure we give you real opportunities to participate, shape decisions and make a difference

Closing the loop: Share outcomes with communities and report back on what we heard, and how we adapted

and in delivering on our promise: "you trust us to do our jobs and to work with you."

Clearly, the inability or unwillingness of DEECA to live up to its role in justifying the selection of kangaroo species for slaughter, in deference to indirectly servicing the needs of a private Industry into which its work delivers a commercial product, ensures that public trust is unlikely to be earned and that these aspirational words are to be regarded only as platitudes.

6. Other

6.1 Public consultation

DEECA's written assurance in its submission that

“Public consultation will be conducted for any comprehensive review of this Plan and relevant public consultation summary report will be published on DEECA's website.

Update the plan to reflect any significant and time critical legislative, regulatory, or administrative arrangements as required.” ²⁵

...is curiously dissonant with what is happening in the real world. A public consultation on the KHP was conducted in July of 2023 but to date its results have not been reported publicly.

In fact, it has fallen onto a Victorian MP to pass a *Production of Documents* motion in Parliament on 1 December 2023, to wrest these uncontroversial documents from DEECA so that these and other results become public.

One might well ask: Why, in this document, is DEECA presenting itself to the Federal Minister for the Environment as a progressive, open and transparent department, while actually failing in its execution of the requirements of the Victorian Public Sector Code of Conduct, to be accountable to the public, on whose behalf it supposedly acts? ^{26,27}

Of course, one can only hope that under new leadership, a departmental culture might change for the better. However, at this time DEECA needs to demonstrate a long-term commitment to its Charter, with positive change embedded in its culture, before it can be trusted to respond honestly to Community concerns and meet its expectations.

6.2 Working with Traditional Owners

It should be patently obvious that there is no meaningful comparison between the traditional hunting of kangaroos by Traditional Owners for the purpose of survival and what is happening with the broadscale slaughter of large populations for commercial exploitation.

And yet DEECA is making the appeal to tradition fallacy by conflating them and seeking to work with Traditional Owners, to offer opportunities to participate in harvesting or processing. ²⁸

The great irony of this is that the First Nations people were historically subject to a slow program of genocide, driven by settler graziers and landholders, not unlike what is now happening to this specific native animal (with a conspicuous parallel to what occurred with the *Thylacinus cynocephalus*, leading to its eventual extinction in 1936).

Stripped of the platitudes, this goal is truly disrespectful and it could be argued that, for Traditional Owners, it represents another form of cultural dispossession by dominant, non-Indigenous interests, seeking to further distance some from Country.

By co-opting the participation of Traditional Owners, it can also be seen as marketing leverage that might impress a wider non-Aboriginal community to secure social license for the KHP.

It should be noted that many Traditional Owners regard the kangaroo as totemic and worthy of respect and protection, not slaughter.

Yuin Nations conservation organisation, Back To Country, ²⁹ has published the Yuin Declaration; a series of articles created by one of its passed Elders, Uncle Max, to all Indigenous and non-Indigenous Communities to imbue kangaroos with respect and protection in our modern world.³⁰

It would demonstrate a commitment to cultural respect if DEECA included awareness of the Yuin Declaration in its discussions with Traditional Owners, but its message runs counter to the goal of the KHP.

Conclusion

In light of the above points it is the assessment of VKA that the Victorian DEECA's KHP:

- is not sustainable,
- cannot be adequately monitored for compliance with regulations,
- has no capacity to control factors that influence human behaviour motivated by financial incentives,
- has set quotas that are grossly inflated and that wilfully ignore contrary evidence external to its scientific enclave, and
- that its commitment to welfare is repugnant, resulting in systemic brutality to a native animal that disgusts Community expectations.

It is therefore the view of VKA, and many unaffiliated Victorians whose views have been expressed to us both directly and indirectly, that DEECA's application to seek approval to operate a Kangaroo Harvest Program under the Wildlife Trade Management Plan requirements of section 303FO of the Environmental Protection and Biodiversity Conservation Act 1999, **is not fit to proceed** with its KHP and should be **denied** by the Federal Minister for the Environment.

A Judicial Inquiry into the conduct DEECA and the scientific *bona fides* of its population modelling, on which the KHP is premised, is urgently required in Victoria; this request has been put to the newly appointed Victorian Minister for the Environment.

Yours sincerely,



Michael Fuery
For and on behalf of the Victorian Kangaroo Alliance Inc.

cc: The Hon Tanya Plibersek MP, Minister for the Environment
Ms Georgie Purcell MLC, Member for Northern Victoria

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- ⁵ Kangaroo Harvest Program annual statistics; Summary of harvesting activity in 2022, <https://www.wildlife.vic.gov.au/our-wildlife/kangaroo-harvesting-program/kangaroo-harvesting-program-annual-statistics>
- ⁶ Ibid.
- ⁷ VKA has documented more than 250 examples of kangaroo licensed shooters since January 2023, spruiking their services via newspaper advertisements, online social media marketplaces, leafletting and doorknocking. Some shooters have been quite open about their financial hardship pleading with the community for assistance to 'help feed their family.'
- ⁸ Victoria State Government (2023), Victorian Kangaroo Harvest Plan 2024-2028, Response/Management Actions, Action 1.5 Indicator 1.5.2
- ⁹ Victoria State Government (2023), Victorian Kangaroo Harvest Plan 2024-2028, Aim 2: Ensure that commercial kangaroo harvesting in Victoria is conducted according to animal welfare standards; Action 2.1, Indicator 2.1.1, p20
- ¹⁰ Evidence of GMA staff's ambivalence to enforcement of wildlife regulations was presented by a former staffer during the Victorian 2023 Inquiry into Recreational Native Bird Hunting Arrangements.
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- ¹³ Ibid. p5
- ¹⁴ Ibid. p8
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- ¹⁶ NRMA (2022), *Wildlife Road Safety*, <https://www.mynrma.com.au/-/media/wildlife-road-safety-report-final.pdf> p5
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- ²¹ Game Management Authority (2023), Deer hunting education, Retrieval and despatch; <https://www.gma.vic.gov.au/education/deer-hunting-education>

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- 28 Victoria State Government (2023), Victorian Kangaroo Harvest Plan 2024-2028, Aim 5: Work with Traditional Owners to identify opportunities for involvement, p25
- 29 <https://www.backtocountry.org.au/>
- 30 “The Yuin Declaration For Kangaroos was created by Yuin Elder Uncle Max Harrison (1936-2021). He recognised the need to publicly acknowledge the importance of kangaroos as a living totem. He campaigned for their protection on a local and international stage. Uncle Max committed to providing a way for others to understand Aboriginal culture's connection to Country and all living beings.”, <https://static1.squarespace.com/static/62429ad92423051fa85f1eca/t/648a9bef9ef4974aedb88b85/1686805487987/Yuin+Declaration+Protocol+Letter.pdf>