

Wildlife Trade Management Plan for the Commercial Harvest of Kangaroos in New South Wales 2027-2031

Victorian Kangaroo Alliance Submission

September 2026



TABLE OF CONTENTS

Introduction	2
Sustainability of the 'harvesting' regime	3
Counting kangaroos.....	4
Long-term impacts	5
Case study: Victoria	8
Animal welfare	10
Animal sentience	10
RSPCA	10
Wounding	11
Cruelty to pouch joeys.....	16
Cruelty to dependent at-foot joeys.....	16
Monitoring.....	18
Other feedback	19
Impact on wildlife rescuers and carers.....	19
Impact on First Nations Peoples.....	20
Impact on residents and local business operators.....	23
Impact on children.....	27
Health and safety	28
Governance failures - CONFIDENTIAL	29
Alternatives	30
Abolition of kangaroo persecution and exploitation	30
Reeducation.....	30
Coexistence	31
Ecotourism.....	32
Conclusion.....	32

Introduction

Victorian Kangaroo Alliance Inc. (VKA) is a statewide network of concerned citizens dedicated to protecting kangaroos from persecution and exploitation via the world's largest land-based wildlife trade. We condemn the current treatment of kangaroos as inherently **unethical, unsustainable and unhygienic**. We seek to improve protections for kangaroos by lobbying the government for legislative change, and by raising public awareness to reduce consumer demand for kangaroo products. We encourage and support Victorian communities to defend their local mobs, and promote harmonious

interactions. We advocate for these magnificent beings to be valued and respected as an ancient totemic keystone species, worthy of full protection and the right to live freely on their ancestral land.

Thank you for the opportunity to express our strong opposition to the draft Wildlife Trade Management Plan for the Commercial Killing of Kangaroos in New South Wales 2027-2031 ('the draft Plan'). Though we are based in Victoria, we have a valuable perspective to offer neighbouring NSW. This is because, unlike the many decades of exploitation that has been occurring in NSW, the commercial kangaroo trade was only recently established in Victoria, enabling us to witness the stark (and immense) impact of commercial shooting. The limited Victorian Kangaroo Pet Food Trial (KPFT) commenced in 2014, and was replaced by the state-wide Kangaroo Harvesting Program in 2019. The program was sold to Victorians on the proviso there would be no increase in the number of kangaroos killed, and that commercial utilisation of the carcasses from 'culling' was simply to reduce waste. As we will elaborate, this was not the case, and the commercial incentive has driven a massive increase in kangaroo shooting, wounding and orphaning in Victoria, with follow on impacts to residents, First Nations people, businesses, and wildlife volunteers. This serves as vital evidence that commercial shooting is not the benign use of kangaroo bodies that would otherwise go to waste, it is profit-driven wildlife exploitation that cannot be countenanced in a modern society.

NSW is well aware of these issues as the 2021 NSW Parliamentary Inquiry into the Health and Wellbeing of Kangaroos and Other Macropods unearthed widespread cruelty, impacts on the community, and failures of regulation and policy. The draft Plan continues large-scale commercial killing of kangaroos and joeys despite only 2 of the 23 Inquiry recommendations having been only partially addressed. This is even more egregious as the Inquiry recommendations were the bare minimum, already watered down by the vested interests on that committee. Whilst the only responsible action is to ban commercial kangaroo shooting immediately, at the very least **the NSW Government should commit to fully implementing all outstanding recommendations of the 2021 inquiry before any new plan proceeds.**

Sustainability of the 'harvesting' regime

'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.

The 'sustainability' of exploiting kangaroos is premised on the myth that 'kangaroos are better off since European colonisation' (due to clearing, artificial watering points, and removal of dingos), a tired axiom which simply does not stack up. Artificial watering points have been repeatedly proven to have little impact on kangaroo distribution and abundance.¹ Dingos aren't a major predator for kangaroos except

¹ Montague-Drake R and Croft DB, 2004, p.87; Lavery, 2018, p.31; Fukuda, p.497, Letnic & Crowther, 2013.

during drought, and they did not even exist in Australia for millions of the years macropods have been evolving here.² Grey kangaroos are a woodland species, so mass clearing and introduction of competing introduced herbivores is also not beneficial.³ The result of colonialism for kangaroos has been fragmented and degraded habitat, commercial and non-commercial shooting, poisoning, introduced toxic grasses, cars, fences, dogs, foxes (they take up to 50% of emergent joeys⁴) and the effects of climate change like worsening droughts, fires and floods. There needs to be a concerted effort to combat the cavalier misinformation about kangaroos and take stock of the reality.

Counting kangaroos

The kangaroo industry relies 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. Independent scientists have long been raising the alarm that these population surveys are deeply flawed, and keep changing the parameters to create the illusion of abundance or at least stability in populations as stakeholders (government, agricultural industry and kangaroo industry) have a financial interest in ensuring kangaroo populations are perceived as stable or high.⁵ This has been extensively evidenced as the aerial transect method has repeatedly produced results that are both biologically impossible and incongruent with observations on the ground, yet they are accepted as reliable science by vested interests.

Honorary Associate Professor David Brooks said of kangaroo population estimates:

*'It is hard to see how they could in any way approximate reality or perform any other function than to mask the true extent of the damage already done to the species and perpetuate the gross delinquency of the industry'.*⁶

In a 2021 Victorian example, government funded population surveys estimated a population of 7000 kangaroos on the Mornington Peninsula, yet a rigorous count on the ground overseen by Dr Greg Holland found only 2200 kangaroos.⁷ In this case, and all cases, the quotas are based on the government's estimates regardless of how incorrect they are.

Ultimately, we need to question why we are so focused on numbers of kangaroos, and not the millions of introduced herbivores, particularly cows and sheep, that eat and drink significantly more than kangaroos and are immensely detrimental to the environment.

² Morrant, 2017, Doherty, 2019a; Thompson, p.1265; Doherty, 2019b, p.39

³ Scroggie, Maloney, Ramsay (2025) <https://www.publish.csiro.au/wr/Fulltext/WR23133>

⁴ Banks, P.B., Newsome, A.E. and Dickman, C.R. (2000), Predation by red foxes limits recruitment in populations of eastern grey kangaroos. *Austral Ecology*, 25: 283-291 (p.286).

⁵ Extensive research captured by *Kangaroos at Risk* (2015) www.kangaroosatrisk.org

⁶ Brooks, D., (2022) 'The Number Game: Counting Kangaroos', *Animal Studies Journal* 11(1), 1-36. doi: <https://doi.org/10.14453/asj/v11i1.1>

⁷ Carter, Holland & Mooney, (2021) *Results from the Peninsula Count Your Mob Project*. <https://img1.wsimg.com/blobby/go/a5643baa-d4d8-4ba8-988b-7006e9477449/downloads/3aa4e891-cd3b-4d96-8d3c-55bb32061c5d/Results%20from%20The%20Peninsula%20Count%20Your%20Mob%20Proj.pdf?ver=1745720630620>

Long-term impacts

We cannot predict the long-term outcome of destroying complex mob structures by removing dominant adults, and artificially selecting against the biggest and strongest individuals. In fact, the 'Victorian Kangaroo Harvest Management Plan 2021-2023' noted this as a concern: *'The genetic diversity of species can be influenced by the selective removal of individuals that display specific traits, **potentially reducing the species' fitness**. This could become a risk if harvested kangaroos are selected for specific traits, in numbers that are high enough to have long-term genetic impacts'*.⁸ In addition to genetic concerns, there are behavioural concerns (not addressed at all in the draft Plan) as kangaroo mobs have an intricate social structure that is critical to their survival, and by undermining this key feature, we may be irrevocably changing their behaviour and damaging the ongoing viability of the species.⁹ Removal of the alpha male destroys the balance whereby intact mobs tend toward stability in line with the available resources, and instead it allows beta males to breed, potentially increasing conflicts with humans. We simply do not know the long term impacts of destroying these social structures that have maintained kangaroos over millions of years. Whilst the long-term impacts remain unknown, it is not possible to be certain the kangaroo industry is not in breach of Part 13A of the Environment Protection and Biodiversity Conservation (EPBC) Act, which states, *'the operation will not be detrimental to... the survival of a taxon to which the operation relates'*. **We are essentially playing Russian roulette with the future of this iconic and essential species.**

Furthermore, as the primary native herbivore, kangaroos should be abundant, and we do not know the broader ecological impact of decimating the numbers of this keystone native species. The following are a selection of quotes from an interview with Simon Mustoe, Australian expert ecologist and author of *Wildlife in the Balance: Why Animals Are Humanity's Best Hope*.¹⁰

*'We don't know for sure which native animals might be essential for our future, so we cannot presume to kill any. **The consequences of our kangaroo culls will be predictably dire though.** Megafauna like kangaroos systematically transfer, concentrate and amplify energy-giving nutrients that underpin entire rural economies based around farming.'*

*'As costs and tensions rise, it's no surprise that conflicts occur between people and animals. It's happening all over the world. But **killing more animals is not the solution**, because we need them more than ever, to rebuild what we've lost.'*

*'Ecosystems and biodiversity are so complex we will never be able to describe or understand them completely. The traditional way to do ecological studies, therefore, is to break a problem down into manageable units. **This can, however, lead to conclusions that are easily misinterpreted by the layperson, leading to the opposite of what we need to know at the***

⁸ https://www.wildlife.vic.gov.au/_data/assets/pdf_file/0022/505624/Victorian_Kangaroo_Harvest_Management_Plan_2021-2023.pdf (p. 35).

⁹ Ben-Ami, Dror et al. (2014). The welfare ethics of the commercial killing of free-ranging kangaroos: An evaluation of the benefits and costs of the industry. *Animal Welfare*, 23(1), 1-10.; Parliament NSW. (2021b). *Health and wellbeing of kangaroos and other macropods in NSW*. [Link](#).

¹⁰ https://www.animaljusticeparty.org/kangaroos_are_australias_key_to_surviving_the_ecological_crisis_heres_why

landscape scale. For example, it's common for ecologists to do 'exclusion' studies. This is a controlled experiment where you might, for instance, create an area with no herbivores and compare that to an area with herbivores. Naturally the area without herbivores flourishes. This is a linear study that could be used to conclude that herbivores reduce vegetation cover. This is far from true however, as vegetation is not an ecosystem.'

*'Conservation scientists rarely consider that these animals were solely responsible for creating stable ecosystems in the first place. The same places that delivered soil, water and climate for humans for tens of thousands of years. The reason why we must supplement land with water and fertiliser today is because of a decline in ecosystem health. The soil that existed when Europeans settled was created by native wildlife and kangaroos were among the most notable of our country's fauna... **We need kangaroos and other wildlife to rebuild and sustain soil across the whole continent and the sooner we start, the quicker we will see results.**'*

*'Kangaroos, and other animals, are key to recreating viable farmland. We already know what a balanced ecosystem looks like, and with their help, we can restore this, probably within 20-30 years. The only thing that is stopping us from achieving this, is that we have allowed ourselves to become convinced that we will be better off without kangaroos. **This vendetta against wildlife is not a good situation to put ourselves in when animals are the only mechanism that can restore whole ecosystems fast and affordably.** Unless our leaders help create a change in human values and call for more protection of wildlife we may have little time left to recover our recent losses.'*

In 2023, we spoke to another wildlife ecologist, Dr Holly Sitters, based in regional western Victoria.¹¹ She voiced similar concerns:

*'Government-approved destruction of native wildlife makes a mockery of the international 'Nature Positive' movement and is outrageous in the context of a global biodiversity emergency. As a quantitative ecologist, **I do not consider 'sustainable use' of a native animal appropriate or feasible during an extinction crisis and at a time of ecological collapse.** The complexity of natural systems combined with unprecedented rates of environmental change and major uncertainties surrounding current population densities mean that **it is impossible to predict the impacts of future threats on wildlife with confidence.** Common species can become rare very quickly. Therefore, the only logical approach is to remove as many threats as we can. **It is imperative that hunting pressure on kangaroo populations is removed.**'*

*'The exploitation of kangaroos is driven by colonial attitudes which remain entrenched in our systems of power, rather than by any defensible scientific basis. **Valid ecological reasons for killing kangaroos do not exist.** Effective, non-lethal alternatives to killing are always available where it is necessary to actively manage wildlife. **I strongly believe that the precautionary***

¹¹ Regional ecologist condemns kangaroo trade (2023). https://img1.wsimg.com/blobby/go/a5643baa-d4d8-4ba8-988b-7006e9477449/downloads/Regional%20Ecologist%20condemns%20kangaroo%20trade_131.pdf?ver=1745720630786

principle should be applied in matters regarding wildlife if future generations are to experience the joy of viewing animals in their natural habitats.'

The fact that the world's largest land-based wildlife trade operates on the basis of guesswork and assumptions is patently unacceptable, gravely irresponsible, and against the public interest. In light of this, it would be beneficial to have an independent inquiry into the vested interest of academics who routinely promote the kangaroo industry. How many are on the payroll of government departments, the kangaroo industry, or motivated by their own business interests? It brings to mind the case of a slick social media presence, 'A Kangaroo Conversation', that popped up on many platforms in 2023. They claimed to be 'independent', but a bit of research showed they were funded by a South Australian government grant that was part of a program supported by Macro Group - i.e. the kangaroo industry.

5 Apr, 10:23 pm

akangarooconversation messaged you about a comment you made on their post. [See Post](#)

Our platform has no ties to any commercial industry, our focus is on conservation and ecosystem balance.



Case study: Victoria

When it comes to the commercial shooting of kangaroos and our objection to the draft Plan, Victoria provides an illuminating case study. Aside from a brief foray into the commercial industry in the 1980's (it was quickly deemed unsustainable and discontinued), Victorian landholders could access non-commercial Authority to Control Wildlife (ATCW) permits to shoot kangaroos they deemed inconvenient, with little consideration of non-lethal alternatives. This bad situation was made worse when the commercial 'Kangaroo Pet Food Trial' (KPFT) was introduced in 2014. Then Victorian Minister for Agriculture, Peter Walsh, said commercialising kangaroo shooting '*will not mean any increase in the wildlife control permits at all, it is just utilising the waste that is there from the current controls*'. Yet since commercialisation, the average kill quotas have ballooned to over triple their previous rate, as per the figures in the graph below.

KANGAROOS 'APPROVED FOR CONTROL'			
PRE-COMMERCIAL		POST-COMMERCIAL	
Year	Quota	Year	Quota
no earlier data		2015	135,887
		2016	169,544
		2017	189,086
		2018	168,992
		2019	136,502
		2020	137,800
		2021	191,200
2009	64,152	2022	185,850
2010	39,559	2023	236,350
2011	34,721	2024	236,350
2012	45,717	2025	207,800
2013	75,139	2026	207,800
Average	51,858	Average	183,597
*excludes 2014 (quota 84,100) as commercial system started in April			

Victorian Labor were well aware of this issue. In 2018, the Department of Environment, Land, Water and Planning (DELWP) produced an evaluation of the Kangaroo Pet Food Trial showing it may have actually increased waste, as well as being lawless, corrupt, a threat to sustainability, and low-value to the taxpayer.¹² The following are extracts from that report:

*'The Kangaroo Pet Food Trial (KPFT) has highlighted some key risks associated with introducing a financial incentive into the Authority to Control Wildlife (ATCW) system. **Numbers of kangaroos***

¹² Victorian Department of Environment, Land, Water and Planning. (2019). *Kangaroo Pet Food Trial Evaluation Report*. <https://img1.wsimg.com/blobby/go/a5643baa-d4d8-4ba8-988b-7006e9477449/downloads/KPFT-Evaluation-Report-Dec-2018.pdf?ver=1745382063445>

approved for control have risen sharply in trial areas, particularly in the last two years of the trial. (executive summary)

*'It appears that the behaviour of some KPFT shooters, who have an interest in maximising numbers controlled, is having some influence on the number of kangaroos landholders are requesting to control. As a result, numbers approved for control have increased under the trial. **This may not only compromise the aim of reducing waste, but could also threaten the sustainability of kangaroo populations in future years if an expectation of a steady supply of carcasses was created.**'* (executive summary)

*'Over the trial period, **the average number of kangaroos approved for control in trial areas was more than two-and-a-half times (260%) that of the long-term average.** The deviation from the long-term average is much larger in trial areas than in non-trial areas.'* (p. 5)

*'While carcass use certainly increased because of the trial, it is difficult to say with certainty whether the KPFT actually reduced overall carcass waste – given that higher numbers controlled because of the trial may offset the increased use, **resulting in similar or even higher numbers remaining wasted.**'* (p. 7.)

This damning report was brazenly ignored by Victorian Labor who launched the Kangaroo Harvesting Program (KHP), removed the need for landholder permits and opened nearly the whole state to commercial 'harvesting'. The predictable result was commercial shooters desperately soliciting landholders for kangaroos in order to make their business viable. We have received reports of kangaroo shooters leafleting, door-knocking, and advertising via newspapers and Facebook community groups across the state in search of kangaroos to shoot, yet they still cannot come close to the overblown quotas.¹³

The superfluity of commercial shooters in Victoria who can be booked in 3 minutes without permits, no questions asked, has resulted in both the rapid disappearance of kangaroos in many areas, **and the complete disincentivisation of non-lethal coexistence strategies.** Though studies have shown kangaroos are soft on soil and improve native grasslands, disperse seeds, eat and drink far less than introduced herbivores and only compete with them during drought, kangaroos continue to be treated as 'pests' as long as the state and federal governments and kangaroo industry perpetuates their unjust demonisation.¹⁴

In light of this case study, we argue that the commercial imperative will always trump sustainability concerns, and kangaroos will be at risk of over-exploitation for as long as people stand to profit from killing them.

¹³ <https://vickangas.org/blog/f/commercialisation-threatens-sustainability>

¹⁴ Eldridge, David. (2018). Livestock activity increases exotic plant richness, but wildlife increases native richness, with stronger effects under low productivity. *The Journal of Applied Ecology*, 55(2), 766–776. [Link](#); Grigg, Gordon. C. (2002). Conservation benefit from harvesting kangaroos: status report at the start of a new millennium, a paper to stimulate discussion and research. *A Zoological Revolution. Using native fauna to assist in its own survival*. D. Lunney and C. Dickman. Mosman, Royal Zoological Society of NSW: 53-76.

Animal welfare

The kangaroo industry and government tout the virtues of the *National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes*, but it is deeply flawed. Cruel practices are enshrined in the Code of Practice, and there is virtually no oversight at the point-of-kill to ensure even these minimum standards are being met. Given that the Code is not legally enforceable and serves to exempt shooters from enforceable animal welfare legislation, it can only be considered a vehicle for enabling mass animal cruelty.

Animal sentience

The sentience of non-human animals is abundantly clear and long overdue for legal recognition in Australia. The sentience and sapience of kangaroos is obvious to anyone who observes their rich social lives and familial bonds. Wildlife carers describe their emotional connection with kangaroos as deeper than those formed with other companion animals such as cats and dogs.



The close bond between carers and kangaroos. Credit: Helen Round.

In the words of the Australian Veterinary Association:

***'Animals are sentient beings that are conscious, feel pain, and experience emotions... Animals have intrinsic value and should be treated humanely... They should not be used... for purposes where suffering, injury or distress is likely to be caused.'*¹⁵**

RSPCA

There is an incorrect assumption that because the RSPCA had a hand in developing the Code of Practice that they endorse kangaroo shooting. In fact, the RSPCA policy states *'RSPCA Australia is opposed to the*

¹⁵ <https://www.ava.com.au/policy-advocacy/policies/animal-welfare-principles-and-philosophy/ava-statement-of-principles--animal-ethics/>

killing of wild animals for commercial purposes unless this meets specific criteria'.¹⁶ This criteria includes ensuring lethal management is conducted with adequate justification and without an incentive, and only when non-lethal methods are not possible, and when killing can be done without pain, suffering or distress - all of which are in fundamental opposition to the kangaroo industry and the reality of kangaroo shooting.

In 2022, Dr Rebekah Evers from the RSPCA spoke out decisively against the commodification of kangaroos.¹⁷ She voiced concerns about the lack of monitoring at the point-of-kill, the lack of guaranteed accuracy and how profit motivates increased killing whilst disincentivising the development of more humane means of coexistence. This echoed the content of the RSPCA submission to the 2021 Parliamentary Inquiry into Health and Wellbeing of Kangaroos and Other Macropods in NSW:

*'The RSPCA would first like to highlight its concern regarding the general direction of kangaroo management in Australia. **Kangaroo killing is now viewed primarily as a means of sustaining a commercial industry**, rather than one premised upon the basis of long-term population control and environmental damage mitigation.*¹⁸ *We believe that without a direct demonstrable connection to the latter objective, the practice of kangaroo shooting loses much of its justificatory basis in the eyes of the Australian community; particularly in light of the **inherent animal welfare risks associated with the practice***'.¹⁹

The RSPCA notably pulled kangaroo meat products from its stores in 2022, citing animal welfare concerns.

Wounding

It is an incontrovertible fact that kangaroos are regularly horrifically wounded and die slow, painful deaths as a result of both commercial and non-commercial shooting.²⁰

The Code acknowledges this inevitable human error, and that not all kangaroos will be killed humanely. It states:

'Adult animals that are shot but not killed (or are injured in another way during harvesting e.g. hit by a vehicle, fence entanglement) should be found and promptly euthanased. If left, wounded animals can escape and suffer from pain, distress and the disabling effects of the injury.' (p. 11)

¹⁶ <https://www.rspca.org.au/learn/responsible-sourcing/kangaroos/>

¹⁷ Straight, Kerry. (2022, May 7). Roo Row: The highly divisive kangaroo industry. *ABC Landline*. [Link](#).

¹⁸ We fundamentally disagree with the premise that kangaroo populations must be managed or that kangaroos negatively impact the environment. They have evolved with this country for millions of years as a keystone native herbivore, managing their own populations before the arrival of westerners. The myth that colonisation has benefited kangaroos has been robustly debunked. See Auty, John. (2004). Red plague, grey plague: the kangaroo myths and legends. *Australian Mammalogy*, 26(1), 33–36.; Mjadwesch, Raymond. (2011). *Kangaroos: Myths and Legends*. In *Nomination to List the Large Macropods as Threatened Species under the NSW Threatened Species Conservation Act*. Bathurst, NSW: MESS. [Link](#).

¹⁹ RSPCA Australia and RSPCA NSW. (2021, April 23). *Joint submission: Parliamentary Inquiry into Health and Wellbeing of Kangaroos and Other Macropods in NSW*. [Link](#).

²⁰ See *VKA Graphic Overview* and testimony from wildlife rescuers available [here](#).

This acknowledgment is in spite of the proficiency testing required for commercial shooters. Though preferable to the inexcusable lack of testing for non-commercial shooters, the fact remains that the mandated accuracy testing cannot mitigate the inevitability of human error when field conditions involve targeting unpredictably moving wild animals at night in potentially windy and rainy weather. Shooters cannot always ensure death is confirmed as the kangaroos can be lost in vegetation or escape with injuries.²¹

A forensic analysis submitted to the 2021 NSW Inquiry 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.²² Consistent with this finding, Wildlife Victoria has reported a 55% increase in requests to attend kangaroos with gunshot wounds since the commercialisation of kangaroo shooting in Victoria.²³

The Code claims only that '*all reasonable efforts*' should be made to find wounded kangaroos, but there is no specification of what constitutes a '*reasonable effort*', particularly under commercial circumstances when time is money and shooters are financially disincentivised from spending significant amounts of time following up escapees. Wildlife rescuers will spend days in pursuit of wounded animals, but shooters have no such intrinsic motivation.

The immense and often protracted suffering of wounded kangaroos is unacceptable, and a major reason (amongst many others) why kangaroo shooting should be outlawed.

The following is a series of graphic images showing the sort of gunshot wounds attended by Victorian rescuers. It is a small selection of what we have on file, which is in itself only the very tip of the iceberg as most wounded kangaroos will never be found.

²¹ Kangaroo Industry - Dirty Graphic Truth [industry exposé]. [Link](#); VKA *Graphic Overview*.

²² NSW State Government (2021), Health and wellbeing of kangaroos and other macropods in New South Wales, <https://www.parliament.nsw.gov.au/lcdocs/inquiries/2707/Report%20No%2011%20-%20PC7%20-%20Health%20and%20wellbeing%20of%20kangaroos%20and%20other%20macropods%20in%20NSW.pdf>

²³ <https://www.wildlifevictoria.org.au/media/wildlife-victoria-flags-major-animal-welfare-concerns-with-states-kangaroo-harvesting-program>



"full of crawling maggots... left to die a very slow horrible death"

Carlsruhe, Vic. Oct, 2023. Eye shot, found alive.

©Sue Anderson



"I've never seen a kangaroo in so much agony. It was horrible..."

Gisborne, Vic. Oct, 2023. Face shot, found alive.

©Sue Anderson



"she had a little joey and possible missing joey"

Lara, Vic. Oct, 2023. Jaw shot, found alive.

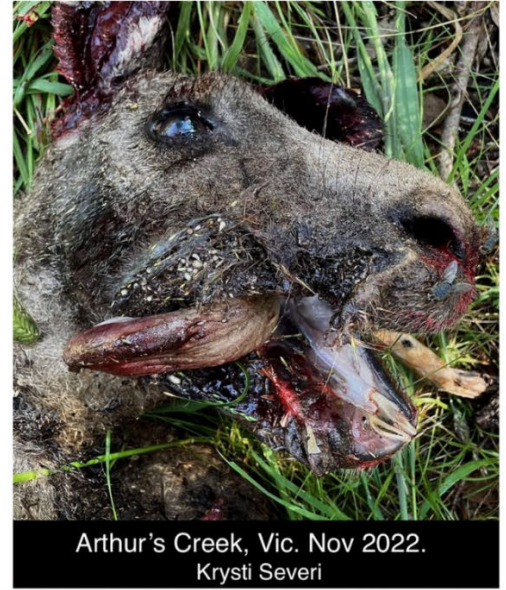
©Trevor Crawford



"his jaw hanging on by necrotic bits of muscle and tendons"

Kilmore, Vic. Sept, 2023. Jaw shot, found alive.

©Krysti Severi



April, 2024. Willowmavin, Vic.



Joey found alive, shot in the face.

"Just a bubba"

Krysti Severi

Oct, 2024. Eynesbury, Vic.



Found alive, shot in the jaw.

"The wound was old, she'd lost a lot of body weight but still had a very active teat [which indicates an at-foot joey]."

Trevor Crawford

Sept, 2024. Lancefield, Vic.



Found alive. Shot in the jaw.

"I heard shooting locally a few nights before. A highly experienced darter said she was one of the worst he'd ever seen, and that's saying a lot."

Debbie Gwyther-Jones

Sept, 2024. Greendale, Vic.



Found alive, shot in the jaw & carrying a joey.

"She had come to someone's house for help"

Trevor Crawford

Cruelty to pouch joeys

The Code of Practice includes the bashing ('concussive blow to the head') of furred pouch joeys – considered a waste product. The Code notes the correct method is difficult as the shooter must bash the correct part of the joey's head, and *'the efficiency and humaneness of this method depends on the operator's skill and determination'*.²⁴ In reference to the euthanasia of wildlife, the Australian Veterinary Association (AVA) similarly states, *'in the event that other options are not available in the field, and as a last resort, blunt trauma if properly applied, can result in rapid death but is dependent on the knowledge and experience of the operator'*. There is no joey-bashing proficiency test, and no oversight to ensure it is being performed in a manner that will minimise pain, fear and distress.

The Code also prescribes decapitation or cervical dislocation for the killing of unfurred pouch joeys. The AVA states, *'procedures such as cervical dislocation or decapitation are problematic and there are inadequate guidelines for their suitability in some species. More research is needed to establish and evaluate more suitable methods of euthanasia for wildlife.'*

In all cases, the joey must experience the terror (and potential injury) of falling as their mother is shot, and being pulled from the pouch (further terror and potential for injury) before being harmed in one of the horrific methods listed above. As all the methods of killing pouch joeys come with a significant likelihood of distress and suffering, it stands as a key reason why kangaroo shooting can never be considered humane or acceptable.

Cruelty to dependent at-foot joeys

At-foot joeys are also supposed to be euthanised as 'collateral damage' but often escape to die slowly from exposure, starvation and predation, suffering great distress without maternal care.²⁵ This reality was captured in the deeply disturbing research of McLeod and Sharp (2014), and has been borne out in Victoria with a major wildlife rescue network, Wildlife Victoria, announcing they recorded 'a staggering 600% increase in orphaned joey cases' since the introduction of the commercial kangaroo industry.²⁶

The Code states:

*'Orphaned dependent young-at-foot that are likely to experience severe suffering and have a poor chance of survival, should be euthanased wherever possible... **Euthanising young-at-foot can be problematic as they are usually mobile and will often flee** after the female has been shot. However, harvesters must make every reasonable effort to euthanise dependent young-at-*

²⁴ AgriFutures Australia. (2020). National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes. [Link](#).

²⁵ McLeod, Stephen and Sharp, T. (2014). Improving the humaneness of commercial kangaroo harvesting. *Rural Industries Research and Development Corporation*. [Link](#); Parliament NSW, (2021a).

²⁶ <https://www.wildlifelifevictoria.org.au/media/wildlife-victoria-flags-major-animal-welfare-concerns-with-states-kangaroo-harvesting-program>; <https://www.facebook.com/share/p/1XCZDPF5RD/>

foot. This could include shooting the young-at-foot first or waiting until they return to the location where the female was shot.'

Again, there is no specification of what 'every reasonable effort' entails, particularly under commercial circumstances where shooters are financially disincentivised from dedicating time to finding orphans.

Dr Elaine Ong AM, founder of Vets for Compassion, has decades of experience in animal rescue and spoke to us about why the above segment of the Code's is totally impractical. Dr Ong said:

*'It takes a lot of perseverance, time and luck to capture orphaned joeys. When a mother has been euthanised or killed by shooters, the dependent joey is extremely difficult to catch. Without their mother's milk they will starve to death, unless taken into care. There have been many times I have hidden for three days (sometimes camping inside shrubs) near a dead mum's body waiting for a joey to return so I have a chance to dart them. **There is no chance a commercial shooter would spend that amount of time and effort searching for a joey.**'²⁷*

Dr Ong's message was echoed in the Australian Government Rural Industries Research and Development Corporation report that informed the wording in the Code, *Improving the humaneness of commercial kangaroo harvesting* by McLeod & Sharp in 2014.²⁸ Here are some quotes from their report:

*'Our research has demonstrated that **the welfare impact on young-at-foot can be severe when they lose their mother.**'* (p. xvi)

*'It is not known what proportion of orphaned young-at-foot are euthanased. **It is possible that many are not euthanased but are left to fend for themselves.** This is because the shooting of young joeys can be problematic. Shooters state that in some instances they don't see young-at-foot or they flee before they can be euthanased (RSPCA Australia, 2002) and they can be difficult to kill because of the safety issues associated with shooting at close range.'* (p. 60)

*'During [in-field] observations, 24 young-at-foot were seen. One was euthanised by a shot to the head, in accordance with the Code. Atypically, this joey was shot before its mother was shot (and she was successfully shot after). Another young-at-foot was shot at twice but both shots missed and the animal escaped. **In all the other instances when young-at-foot were seen, there was no attempt to euthanise them.**'* (p. 110)

*'When the alarmed young-at-foot took flight, **none of the harvesters pursued or searched for the young-at-foot or waited to see if they would return to the location where their mother was shot.** If a young-at-foot was not seen, but the female had a long teat indicating she was likely to be suckling a young-at-foot, **none of the harvesters spent time searching for a young-at-foot,***

²⁷ <https://vickangas.org/blog/f/the-code-of-practice-impractical-inevitability-cruel>

²⁸ McLeod & Sharp, (2014).

nor did they wait to see if a young-at-foot returned to the location where the female was shot.' (p. 19)

This research means the state and federal governments are well aware that compliance with the Code is rare, and that the slow suffering of hundreds of thousands of youngsters is inevitable. They also know there is virtually no means of enforcing compliance in the field, yet they continue to disingenuously promote the industry as 'humane' and 'regulated'. This demonstrates the broader issue of industry capture and government complicity in sanitising the reality of kangaroo shooting that they know would be unacceptable to the majority of Australians and the international community.

Monitoring

Despite frequent claims that commercial and non-commercial kangaroo shooting are 'highly regulated', the reality is that kangaroo shooters are virtually unmonitored in the field, at the point-of-kill. The draft Plan conveniently does not mention in-field monitoring, because it doesn't exist. Bureaucrats developing written regulations and managing licensing and tags is simply a performative drain on the public purse when there is no means of ensuring in-field compliance in any meaningful way. Compliance with the Code relies on shooter self-regulation, which is woefully inadequate and effectively useless. The humaneness of each kill is entirely down to the skill, luck and ethics of the shooter who is active at night in broad, often remote geographical range, usually alone or with just an offsider. Shockingly, some shooters find it appropriate to take young children offsidings on their overnight shoots.²⁹ This serves as a stark example of just how lax and unregulated the industry is, and how broadly it tolerates behaviour that would never be acceptable in an abattoir.

The lack of adequate in-field monitoring means there is no way of enforcing the Code of Practice, rendering it largely redundant. Attempting to analyse beheaded carcasses for proof kangaroos were killed according to the Code of Practice with a headshot that '*destroy[ed] the vital areas of the brain*' is blatantly farcical. If kangaroos are shot in the face, the evidence is removed by severing the head, and if they are shot in the neck the shooter need only administer a little more effort to sever the neck closer to the shoulders to then deliver the body to the chiller. It is clear from viewing images of kangaroo bodies in chillers that many have short necks, and there is nothing to prevent this behaviour.³⁰ As other wild 'game' animals, such as pigs, are delivered to chillers with heads attached, the same should be enforced for kangaroos and any evidence that the kangaroo did not die from a shot that destroyed the brain should subject the shooter to prosecution. However, even such a scheme would be inadequate as it would not capture kangaroos discarded due to inaccurate shots, those that escaped wounded, or joeys left orphaned.

If the government fails to abolish kangaroo shooting, there should be an urgent overhaul of the compliance system where shooters' movements are tracked, and their activities monitored with body

²⁹ 'Children in killing fields'. *Kangaroo Industry - Dirty Truth*. <https://www.facebook.com/media/set/?set=a.102469752210106&type=3>

³⁰ 'Dirty field depots'. *Kangaroo Industry - Dirty Truth*. <https://www.facebook.com/media/set/?set=a.101886092268472&type=3>

and rifle-mounted cameras. Real time footage should be available publicly and subject to rigorous scrutiny. The cost of this compliance should not be worn by taxpayers.

Other feedback

The information we provide in this section is largely from a Victorian perspective, but we believe it is absolutely relevant and transferable to the NSW context.

Impact on wildlife rescuers and carers

We regularly hear from volunteer wildlife rescuers about the psychological, physical, logistical and financial toll of rendering assistance to the wounded and orphaned left behind by kangaroo shooters. They undertake this gruesome and heartbreaking work at great personal cost, and with no support from the government or kangaroo industry that are responsible for the carnage. They are highly distressed and traumatised by the cruelty they witness, as well as the knowledge that the government is actively undermining the critical work they do improving outcomes and instilling community respect for our wildlife.

Below are quotes shared with VKA by Victorian rescuers who do the frontline work, an experience also faced by rescuers in SA:

*'I have many reservations about commercial harvesting... but my most deep seated objections to it arise from my professional role as a wildlife and welfare veterinarian. Unfortunately, **my direct professional experience of commercial harvesters (and the downstream results of their operations) has been nothing short of alarming.** I have personally witnessed the **trail of brutality left after harvesters have been in operation...** wreak[ing] havoc with minimal oversight from any regulatory body' ~ Dr Natasha Bassett, veterinarian*

*'It's tough enough to be a volunteer wildlife rescuer without the additional burden of attending to kangaroos that have been maimed by bullets. We are the first responders, we are the ones consistently exposed to the horrors inflicted on these animals. **We see the limbs hanging ragged, the swollen infected, bloated faces and bodies from embedded bullets. We see ones with jaws and noses shot away from what's left of their faces. We witness the wounded mothers unable to tend their pouch joeys.** These are the ones that are found by members of our community, but there are many more unaccounted for, suffering and dying alone. Wildlife volunteers have always been aware of this kind of cruelty towards our kangaroos, but **it has got so much worse since the commercialisation of the kangaroo industry.**' ~ Glenn Cottier, volunteer wildlife rescuer, Macedon Ranges and Mitchell Shire, Vic.³¹*

³¹ https://img1.wsimg.com/blobby/go/a5643baa-d4d8-4ba8-988b-7006e9477449/downloads/VKA%20Media%20Release_Macedon%20Ranges%20Carnage%200403.pdf?ver=1745382063798

'Myself and other rescuers have come across dozens of kangaroos that have been shot and left wounded. We've seen kangaroos with half their face missing, kangaroos with bullet holes in their rumps, legs, and abdomens. They are called in by concerned residents who find them suffering unimaginable pain and fear, and slowly dying of infection... seeing these kangaroos being deliberately slaughtered and maimed is absolutely soul destroying. We dedicate our lives to helping wildlife while our neighbours call in shooters to needlessly kill them.' ~ Stringybark Wildlife Shelter, Kangaroo Ground, Vic.³²

"The killing is causing great distress to many in the community. I am a volunteer wildlife carer and in regular contact with wildlife rescuers. They are sick and tired of 'cleaning up' after the industry: new data confirms an increase of 55% in gunshot wounds since the introduction of the VIC kangaroo killing program in 2019! I am worried about the suffering of the animals but, I am also concerned about the mental well being of fellow wildlife rescuers." ~ anonymous Shire of Yarra Ranges community survey response.³³

Impact on First Nations Peoples

There is a widely held misconception that the kangaroo industry is acceptable because kangaroos are, for some First Nations Peoples, a traditional source of food, materials and medicine. However, it is important to differentiate between cultural use by First Nations Peoples according to Totem, Lore and Protocol, and the exploitative, broadscale wildlife trade that persecutes kangaroos simply for occupying land now dominated by western farming interests. The kangaroo industry and 'kangaroo management' is carried out largely by and for westerners³⁴, and is viewed by many First Nations Peoples as a continuation of extractive colonialism that is exploitative, disrespectful and offensive.³⁵

Kangaroos are an ancient Totemic species holding deep spiritual, cultural and ecological significance. There are several articles in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)³⁶ that relate to access for First Nations Peoples to significant animals, spiritual property and resources – all of which can be applied to kangaroos. Please note these relevant articles:

Article 11.2 - 'States shall provide redress through effective mechanisms, which may include restitution, developed in conjunction with indigenous peoples, with respect to their cultural, intellectual, religious and **spiritual property** taken without their free, prior and informed consent or in violation of their laws, traditions and customs'.

³² <https://warrantydiary.com.au/wp-content/uploads/2022/04/Warrantydiary-April-2022-Download.pdf> (p. 9).

³³ Victorian Kangaroo Alliance. (2025). RESULTS OF KANGAROO SHOOTING IN SHIRE OF YARRA RANGES SURVEY. <https://img1.wsimg.com/blobby/go/a5643baa-d4d8-4ba8-988b-7006e9477449/downloads/3adf8b0c-b081-4b72-aa64-4490aef3c41b/EXECUTIVE%20SUMMARY%20VKA%20SURVEY%20SYR%20MEDIA%20PUBLIC.pdf?ver=1745720630754>

³⁴ Thomsen et al., (2006). p. 127.

³⁵ <https://vickangas.org/blog?blogcategory=Aboriginal+perspectives>

³⁶ United Nations Declaration on the Rights of Indigenous Peoples (2007). https://www.un.org/development/desa/indigenouspeoples/wp-content/uploads/sites/19/2018/11/UNDRIP_E_web.pdf

Article 24.1 - *'Indigenous peoples have the right to their traditional medicines and to maintain their health practices, including the conservation of their vital medicinal plants, **animals** and minerals...'*

Article 28.1 - *'Indigenous peoples have the right to redress, by means that can include restitution or, when this is not possible, just, fair and equitable compensation, for the lands, territories and **resources** which they have traditionally owned or otherwise occupied or used, and which have been confiscated, taken, occupied, used or damaged without their free, prior and informed consent.'*

Article 29.1 - *'Indigenous peoples have the right to the conservation and protection of the environment and the productive capacity of their lands or territories and **resources**. States shall establish and implement assistance programmes for indigenous peoples for such conservation and protection, without discrimination.'*

Article 32.1 - *'Indigenous peoples have the right to determine and develop priorities and strategies for the development or use of their lands or territories and **other resources**.'*

Article 32.2 - *'States shall consult and cooperate in good faith with the indigenous peoples concerned through their own representative institutions in order to obtain their free and informed consent prior to the approval of any project affecting their lands or territories and **other resources**, particularly in connection with the development, utilization or exploitation of mineral, water or **other resources**.'*

Article 32.3 - *'States shall provide effective mechanisms for just and fair redress for any such activities, and **appropriate measures shall be taken to mitigate adverse environmental, economic, social, cultural or spiritual impact**.'*

In violation of these UNDRIP principles, the Australian state and federal governments have unjustly exploited kangaroos without due consultation with First Nations stakeholders. There has been no restitution for the loss of these vital animals, and no attempts by the government to preserve the natural culture, distribution and movements of kangaroos, or the interconnectedness of their relationship with First Nations Peoples.

VKA has been fortunate to learn from Aboriginal Elder Aunty Janet Turpie-Johnstone about how the mass slaughter of kangaroos is an ongoing facet of colonialism that undermines Aboriginal stewardship with a culture of exploitation and profiteering.³⁷ Aunty Janet rejects the euphemism of 'harvesting', calling the shooting of kangaroos '*a mass killing of creatures that do not belong to them*', and a

³⁷ VICTORIAN ABORIGINAL ELDER CALLS OUT "MASS KILLING" OF KANGAROOS AS COLONIALISM (2022). https://img1.wsimg.com/blobby/go/a5643baa-d4d8-4ba8-988b-7006e9477449/downloads/VKA%20Media%20Release_Aboriginal%20Elder%20calls%20out%20k.pdf?ver=1745720630814; <https://vickangas.org/blog/f/precious-not-pest>; <https://lilydale.mailcommunity.com.au/2023/01/07/local-environmentalists-elders-outraged-at-increased-kangaroo-harvesting-quota/>

continuation of 'the base history of this country which sits in multiple narratives of slaughter.' Below are important quotes from Aunty Janet:

*'As an Aboriginal Elder, plus researcher/academic, I totally abhor the way ongoing invasive colonists have taken this Country and her creatures and **absolutely destroyed the very spirit of this land, and harmed our Kin the Kangaroos.**'*

*'The colonial invasion of Australia was basically a grab for land and resources with those breaching the frontiers having little sympathy for all its native inhabitants, from human to the smallest native mouse. Of course, land was first along with forests to support habitation for the ever-growing immigrant populations. Sheep, cattle, horses, camels etc., were imposed onto the landscape. These supported the migrating populations and the colonial economy that belonged to Europe. Almost as quickly, **native creatures became the victims of these colonial extractive industries:** whales, seals, birds, Koalas, Possums, Bats and of course, Kangaroos. **Kangaroos were labelled 'pest' by an invading human species, but Kangaroos only became a 'pest' when the land grab invaded their once peaceful countryside. I wonder who the real invasive pest really is?'***

*'Never forget the colonial invasion was an invasion that saw everything in this Country up for grabs as part of the greed that drove the invasion. It was cruel, it has harmed this Country, and it has put so much of our biodiversity at serious risk. **Was colonisation good for Aboriginal people, their Country and her creatures? No, it has been, and continues to be devastating for all these. The indiscriminate slaughter must stop.**'*

Another important First Nations voice is the Yuin Nations conservation organisation, Back To Country,³⁸ which published the Yuin Declaration for Kangaroos, a formal statement that recognises the long term connection and respect the Yuin nation has for kangaroos. The Declaration is a series of articles created by Yuin Elder, Uncle Max Dulumunmun Harrison, seeking protection of kangaroos and the recognition of their sovereign rights on the Australian landscape.³⁹ The heart of the document is that, **'all kangaroos shall be justly protected from all harms caused by human abuse and exploitation'**. [This critical document should be read carefully and in full.](https://static1.squarespace.com/static/62429ad92423051fa85f1eca/t/648a9bef9ef4974aedb88b85/1686805487987/Yuin+Declaration+Protocol+Letter.pdf)

In 2006, Thomsen et al., produced a study on 'Aboriginal perspectives on kangaroo management in South Australia' for *The Rangeland Journal*. The article demonstrated that customary practices and opinions on the acceptable treatment of kangaroos varied between the First Nations Peoples consulted, but the deep cultural significance of kangaroos was shared. It is particularly significant as it documented Anangu Elders *'oppos[ing] the commercial harvest of kangaroos on their traditional lands which cover*

³⁸ <https://www.backtocountry.org.au/>

³⁹ '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>

*much of the pastoral country north of Coober Pedy.*⁴⁰ Shamefully, this region remains open to commercial shooters. Below is a key passage from the Thomsen et al. study:

*'Many Aboriginal research participants consider native animals belong to Aboriginal people... Some elders from both Adnyamathanha and Western Desert cultures **advocate changes to legislation so that Aboriginal people are legally recognised as the rightful owners of kangaroos and other native wildlife.** It is important to recognise that the concept of ownership expressed by research participants carries a **significant spiritual dimension**, rather than being only, or even primarily, an economic concept. **The strong feeling that many Aboriginal people have about being the owners of kangaroos militates against them accepting the activities of the commercial industry as legitimate, especially since it has developed historically without any consultation or negotiation with them.***⁴¹

It is clear that there has been a lack of consultation with First Nations Peoples regarding the treatment of macropods, and their spiritual and cultural connection to these animals has been cavalierly overlooked. There is clearly scope for much further investigation and restitution for this shameful and ongoing colonial injustice.

Impact on residents and local business operators

Kangaroo shooting inflicts harm on residents who value kangaroos and are faced with their beloved local mobs being constantly in danger or found as a pile of stinking heads, paws and guts near their homes and businesses. A study into the *Human Harms of Kangaroo Killing* was conducted in Victoria in 2022, and this report should be reviewed for more detailed information on this subject.⁴² Recently, VKA conducted a community survey on thoughts and experiences regarding kangaroo shooting in the Shire of Yarra Ranges (SYR).⁴³ We received a huge volume of responses from community members showing that many found commercial kangaroo shooting in their region objectionable and distressing. For example:

To the question: What are your thoughts about commercial kangaroo shooters operating in SYR?

- *"We should not be killing our native animals. The Yarra valley should be a safe haven for our animals."*
- *"It should not occur. People come here to see the kangaroos, i.e. tourism, and it's great to live in this area just an hour from the city that has native wildlife."*

⁴⁰ Thomsen et al., (2006). p. 130.

⁴¹ Thomsen et al., (2006). p. 130-1.

⁴² Anderson, K. (2022). *Human Harms of Kangaroo Killing* https://img1.wsimg.com/blobby/go/a5643baa-d4d8-4ba8-988b-7006e9477449/downloads/Anderson_Kyahl_Human_Harms_of_Kangaroo_Killing.pdf?ver=1745720630619

⁴³ Victorian Kangaroo Alliance. (2025). *RESULTS OF KANGAROO SHOOTING IN SHIRE OF YARRA RANGES SURVEY*. <https://img1.wsimg.com/blobby/go/a5643baa-d4d8-4ba8-988b-7006e9477449/downloads/3adf8b0c-b081-4b72-aa64-4490aef3c41b/EXECUTIVE%20SUMMARY%20VKA%20SURVEY%20SYR%20MEDIA%20PUBLIC.pdf?ver=1745720630754>

- *"Kangaroos should NOT be shot! We take their land and call them pests. We are a disgrace for how we treat wildlife."*
- *"It's abhorrent and should not be allowed."*
- *"They should not be able to operate in the Yarra Ranges council area and SYR."*
- *"Kangaroos have limited areas to live and move and they should be protected. They are a beautiful part of the native wildlife in the area and should be protected at all costs. We love the mobs that live around us, it's part of the beauty and appeal of the area for our family and those around us."*
- *"It makes me sick. Disgusting and it's not right how we treat our native animals."*

To the question: Have you had experience of kangaroo shooting within SYR?

- *"Finding remains and noting local kangaroos disappearing."*
- *"I witnessed the absolute devastation of a mob of kangaroos at the end of my street. So many things concerned me regarding stumbling on this carnage, not least of just how close to residential properties this had taking [sic] place. This mob were regular visitors to our and surrounding properties. We protect these Kangaroos, only to find they are being slaughtered right next door. The manner in which these kangaroos innards were discarded was a small incite [sic] into the disregard the shooters had for these animals. My family and I were watching the headlights driving at high speeds around the paddock they were slaughtered in, we just didn't for a minute think those headlights were shooters chasing animals around a paddock slaughtering them. Please for the love of god don't allow this practice in our backyards, the mobs that live off Victoria road are our Kangaroos, we love them. Please let them live in peace."*
- *"My partner has witnessed the industry and was disgusted by the general attitude and treatment of kangaroos in the hunting process."*
- *"Found Carcasses, Seen Illegal Shooters"*
- *"Ute with dead kangaroos hooked up in back of Ute driving through Seville in day light on Warburton Hwy. image has stayed with me and I dread seeing it again"*
- *"Yes - finding remains of kangaroos blasted to death. Seeing starving Joey's coming in to many wildlife shelters"*
- *"Found live joeys in pouches with shot mums. Some mums still alive with severe wounds. Displaced at foot joeys who usually end up in renal failure from myopathy. One at foot joey still alive with half his face gone. Friend has had shooters at night, loud bangs, spot lights along fenceline and police say they cant [sic] do anything."*
- *"Found remains, orphaned joeys and shots did not always resulting a clean kill, leaving animals to suffer a prolonged & painful death."*
- *"Various experiences; my family and I have come across remains during a walk. This was very traumatic, particularly being with children who we had to shield from the event. We are also concerned about declining numbers of local kangaroos."*
- *"Witnessing shooters, Finding remains"*
- *"I have witnessed 4wd utes drive through town with about 10-12 dead roos hanging off hooks"*

To the question: How have you been impacted by your experience? e.g. impacts on mental health, wellbeing, amenity, community relationships, etc.

140 respondents indicated that the shooting activity program had impacted them personally with:

- 75 indicating isolated feelings of distress
- 2 cases of exposure of the deceased and butchered animals to children
- 5 exposures to evidence of cruelty
- 7 reports of feeling less safe
- 4 exposures to traumatic scenes
- 38 instances where mental health has been adversely affected
- 15 instances indicating an adverse effect on community connections.

Specific details disclosed by respondents included:

- *"I had my granddaughter with me who is 8 and it was very distressing for us both"*
- *"Mental health for ALL family members including the stress on pets and our farm animals"*
- *"All of the above. Mental health, wellbeing, amenity. I'm scared to go out around there at night. It's dangerous with the un-monitored [sic] shooting. Occasionally finding a kangaroo that has been shot in the face and left for dead. It's criminal."*
- *"Witnessing the carnage and aftermath of a "authorized" kill still makes me feel sick to the stomach, a small mob has regrouped and are often in our front paddock grazing or laying in the sun. The thought of the same fate happening to our kangaroos is devastating"*
- *"Yes. The unrelenting extreme cruelty and massive lack of respect for a native animal that has every right to be living here without fear and derision. This has impacted my mental health and I am feeling unsafe to be anywhere in the Yarra Ranges because these shooters will shoot ANYWHERE and they DO."*
- *"My mental health is at breaking point. Never, ever been this bad. And im [sic] not alone, the trauma caused by this is huge and widespread"*
- *"My friends peaceful lifestyle is severely impacted and his children were devastated by the events. He is considering moving to a region without commercial killing"*
- *"Yes... have seen the declining roo numbers in our area. Not good when you are running a BnB Have also seen some that have obviously been the victim of an unsuccessful kill shot. 3 recently... It's distressing also for tourists/guests to see this in our area."*

We will also provide three testimonials below that VKA compiled in 2022. The events and community responses are applicable to NSW residents.

Dunkeld, Vic - tourist area

'Shooting and tourism are not compatible. We operate a tourism business in the Southern Grampians. The introduction of the commercial killing of kangaroos on a neighbouring property

is unbearable. The shooting has had a detrimental impact on our wellbeing and it is an impediment to investment.' ~ Frank Jesse, Griffins Hill Retreat, Dunkeld, Victoria

*'Kangaroo killers sneak into Dunkeld under cover of darkness. They come anytime without warning, bringing guns and gun violence into the township, **terrorising residents and disrupting tourism businesses**. Dunkeld residents now live with ute spotlights regularly shone through our windows, into our bedrooms waking us up; gunfire, terrifyingly close to our houses sometimes for hours on end; witnessing kangaroos shot as close as 40m from our homes and finding chopped up kangaroo body parts dumped nearby. **Our guests have seen kangaroos shot and found their body parts**. We see the baby joeys starve to death after their mothers have been shot and taken. We have no rights - no right to peaceful enjoyment of our properties, no rights to carry out our normal daily activities and businesses without **fear of dangerous shootings and pop-up kangaroo abattoirs without planning permits operating nearby**.'* - Jane Gibb, Griffins Hill Retreat, Dunkeld, Victoria



Dead orphaned Joey. Credit: Jane Gibb.



Body parts left behind. Credit: Jane Gibb.

Venus Bay, Vic - tourist area

*'I first realised what was happening when I saw cut off pieces of kangaroo carcasses on the main road, and not long after I was contacted by a distraught wildlife carer who lives near the farm where shooting was allowed. **She and her family had been woken at night by gunfire and lights blaring across the farm, and then to her horror she discovered dismembered kangaroo carcasses littering the farm the next day**.'* ~ Mae Adams, tourism business owner, Venus Bay



Devastated local holds a head left behind.



Kangaroo body parts strewn in the street, possibly by foxes.

Greenvale, Vic - residential area

'What I [saw] was a man standing over a kangaroo cutting her legs off with what looked like a large bolt cutter, then he dragged and hung her upside down though she was still moving - still alive. I felt like I stepped into a horror movie that I couldn't escape... I continued to watch them being shot at one by one, then the men would pull up and bash their heads in. I started to really get distressed, my breathing was very heavy, I had sweaty palms, and I was panicking... I ran downstairs and hung over the fence screaming at them to stop shooting our roos, stop killing them! I have never felt so powerless. Now every time I look out my window or close my eyes at night, all I see is the men with long bolt cutters, cutting off my beautiful kangaroo's legs, and their innocent bodies swinging from the truck as it crawls around in the dark, killing my small mob. I am incredibly upset people are shooting our wildlife so close to all our houses, and so are our neighbours. There is a very real risk of stray bullets entering our properties and putting our families and pets at risk' - Sarah Shedden, resident, Greenvale, Vic



Kangaroo head in the field next to Sarah's estate.



Sarah showing where she saw the shoot from her fence.

It is evident that many residents form emotional bonds with local kangaroos, and that tourism businesses often rely on them for their tourist appeal. Though they are immensely impacted by kangaroo shooting, these people are not considered stakeholders, and they have no rights to object to shooting near their homes and businesses. This is a compelling reason to ban the practice, or at a minimum, to prohibit kangaroo shooters operating in areas where their macabre activities will negatively impact others.

Impact on children

The horrific practice of allowing children to attend commercial kangaroo shoots and field depots has been documented extensively around the country, with images showing children, often very young,

allowed to handle kangaroo carcasses with little or no personal protective equipment.⁴⁴ If the draft Plan is approved, there must be action taken to legally protect children from these traumatic and dangerous situations. Below are extracts from developmental psychologist and academic, Dr Eleanora Gullone, that highlight our concerns with the long-term ramifications of exposing children to kangaroo shooting:

*'It can be argued that the endorsement of hunting through its legal status provides **societal endorsement to engage in acts of cruelty and violence**. Such endorsement is likely to manifest in a circular manner both by being acted upon by those with compromised levels of empathy and by **increasing individuals' levels of desensitisation to others' suffering** through such legally endorsed acts of cruelty.'*⁴⁵

*'Given that **engaging in cruel or abusive behaviours toward animals (and that the witnessing of such behaviours by children in particular)** is not only associated with engaging in those behaviours toward humans but also with **desensitization to the suffering of others generally (including that of humans)**, it would seem that the only logical, and indeed responsible, position for a society to take would be one that eschews all behaviours deliberately intended to bring about the suffering and/or death of sentient beings.'*⁴⁶

*'There is increasing evidence that a **significant co-occurrence between animal cruelty and human violence exists**. It has also been reported that deriving pleasure from killing or causing suffering to other sentient beings is predictive of low empathy levels, as has been shown to be the case in hunting behaviour.'*⁴⁷

No civilised society should allow children to be exposed to experiences which may result in reduced empathy and desensitisation to cruelty.

Health and safety

In addition to the various ethical and sustainability concerns we have raised, there is a serious hygiene risks posed by the commercial kangaroo industry. It is dangerously unhygienic as carcasses are 'field dressed' (beheaded, gutted and dismembered) and hung from utes with little to no protective clothing, and virtually no oversight in the field. They are then driven around all night in any weather, covered in dust and insects, with mixed wild species crammed together on the back of the open ute.⁴⁸ The combination of wild animals processed in unsanitary conditions leads to a high incidence of parasites, toxoplasmosis, e-coli, salmonella, coxiella, and other pathogens in kangaroo meat.⁴⁹ Imports of

⁴⁴ 'Children in killing fields'. *Kangaroo Industry - Dirty Truth*. <https://www.facebook.com/media/set/?set=a.102469752210106&type=3>

⁴⁵ Gullone, 2005, p.16

⁴⁶ Gullone, 2005, p.20

⁴⁷ *Ibid.*

⁴⁸ Dirty Field Dressing. *Kangaroo Industry-Dirty Truth*. <https://www.facebook.com/share/1DsdrBpEJG/?>

⁴⁹ Kangaroos at Risk. (2015). *Contamination*. <https://www.kangaroosatrisk.org/contamination.html>; Croft et al., (2011) 'Thought again: fair criticism or a muddle-headed grandstanding?' http://s3.amazonaws.com/thinkk_production/resources/23/Response_to_Conney_et_al_-_full.pdf

kangaroo meat have been banned and stocks removed from shelves in areas across the globe on hygiene and animal welfare grounds.

Kangaroos are naturally full of parasites and pathogens, and they are prone to mass mortality events, including epidemics of blindness and subcutaneous haemorrhaging which would likely be catastrophic if they became zoonotic.⁵⁰ These afflictions are harmless to humans and farm animals if the kangaroos are simply left alone. Zoonotic spillover is a serious risk as it is well established that 75% of new and emerging infectious diseases in humans are zoonotic (originate in other animals) and the mass exploitation and handling of wild animals is of particular concern.⁵¹ Thus the intensive handling of kangaroo carcasses makes this ripe for the emergence of a new zoonotic killer.

Given the devastation wrought by a zoonotic pandemic, COVID-19, it is baffling why any government would be willing to align themselves with this incredibly dangerous wildlife trade. We are already exposed to major international censure and condemnation for sanctioning this barbaric, dirty and unsustainable industry, but we will be an outright pariah if Australia becomes the epicentre of a global zoonotic disease outbreak.

For evidence of the repulsive conditions in which kangaroos are killed, please see the photographic archive collected from shooters and shared on *Kangaroo Industry - Graphic Truth*.⁵²

Governance failures - CONFIDENTIAL

*****Confidential: pursuant to s42 of the Victorian IBAC Act (2011). Please redact in published submission*****

We are advised by one of our correspondents that following his analysis of:

- 254 documents released by a Victorian parliamentary motion in 2023 relating to the Kangaroo Harvest Program,
- a side-by-side comparison of 4 years of compliance plans relating to the Kangaroo Harvesting Program, and
- an FOI relating to correspondence received by DCCEEW's WTA office from DEECA, responding to your office's public consultation as part of its draft Kangaroo Harvest Management Plan 2024-2028,

⁵⁰ von Hörchner, Cherie. (2016, December 1). Mystery roo deaths in far west NSW baffle authorities. *ABC Rural*. <https://www.abc.net.au/news/rural/2016-12-01/rural-kangaroo-mystery-deaths/8079490>; Curran, Greg. (2011). Field Investigation of Kangaroo Deaths in Sturt National Park and Areas Near Tibooburra in Early 2010. *Flock and Herd*. <http://www.flockandherd.net.au/other/reader/kangaroo-death-investigation.html>.

⁵¹ Chomel, B. B., Belotto, A., & Meslin, F. (2007). Wildlife, Exotic Pets, and Emerging Zoonoses. *Emerging Infectious Diseases*, 13(1), 6. <https://doi.org/10.3201/eid1301.060480>.

Alic, Margaret. (2019). Bushmeat. *The Gale Encyclopedia of Environmental Health*. A-L. Michigan: Gale.

⁵² Dirty Field Dressing. Kangaroo Industry-Dirty Truth. <https://www.facebook.com/share/1DsdRbPEJG/>

that he alleges the discovery of 10 instances of misleading information and 8 instances of false and misleading information provided by DEECA to your office in order for it to obtain recognition of its Kangaroo Harvest Management Plan 2024-2028 as a plan under the EPBC Act.

Accordingly he has submitted this as a brief of evidence to the Independent Broad-based Anticorruption Commission (IBAC) in April this year as a public interest disclosure and has requested it to determine whether these observations constitute *corrupt conduct*, as defined in s4(1)(b) and (d) of the Act, by a public sector organisation reporting to the Victorian Minister.

VKA urges the Office of the Federal Environment Minister to interrogate and scrutinise the evidence for claims made by NSW OEH in its KHMP. VKA predicts its dismissal of public concerns based on predetermined 'holding lines' and narratives that support the outcome it actually seeks, ie. recognition to enable the Industry to export kangaroo products.

That this behaviour has appeared in another jurisdiction is highly suggestive of an Industry seeking to influence government at high levels, to provide favorable policy treatment to enable its operations despite the abundance of objections highlighted elsewhere in this submission.

******End confidential paragraphs******

Alternatives

Abolition of kangaroo persecution and exploitation

Protecting animal welfare is important to most Australians, and a cornerstone of progressive and moral societies.⁵³ Both commercial and non-commercial shooting of kangaroos is incongruent with public expectation (both domestically and internationally) that animals be treated humanely, so the only reasonable action is to outlaw these archaic practices. Any social license remaining for kangaroo shooting will continue to diminish as the Information Age makes it increasingly difficult to avoid public scrutiny of previously secretive behaviour, such as the systematic terrorising, maiming, killing and orphaning of healthy wild kangaroos. International censure is rapidly increasing, so it would behoove New South Wales to be the first state to disavow this cruelty and stand as a pinnacle of humane wildlife custodianship.

Reeducation

⁵³ For example, a Victorian Labor survey in 2016 showed 98% of Victorians believed protecting animal welfare was important (see p.12: https://agriculture.vic.gov.au/__data/assets/pdf_file/0003/562386/Animal-Welfare-Action-Plan-Dec-2017.pdf).

There is a critical need to reeducate the population regarding kangaroos, and dispel the myths that have persisted since colonisation.⁵⁴ Popular narratives about destructive and ‘over-abundant’⁵⁵ kangaroos have been founded on historical biases conferred over generations by landholders to ultimately become cemented into popular culture. In reality, kangaroos are an essential keystone species critical for biodiversity, imbued with cultural significance, slow breeding, compete minimally with farmed animals and eat and drink comparatively very little. People need to understand that our environment depends on kangaroos, and how killing them is not only brutal, but puts us all at grave risk from zoonotic disease. The government-led promotion of this positive narrative would significantly reduce hostility, increase tolerance and the ‘moral value’ of kangaroos, making them less likely to be persecuted.⁵⁶ This theory is explained by Dr Eleanora Gullone:

‘It is easier to transgress the moral code of behaviour (i.e. kill or create suffering) if the moral value of the target is redefined so that an individual’s or a society’s moral standards no longer apply. Another mechanism is to blame the victim (i.e. the kangaroo is a pest) and in this way justify the perpetrator’s behaviour (i.e., the kangaroo industry). Pejorative stereotyping and indoctrination aid in the use of this mechanism.’⁵⁷

Importantly, we need to combat the mindset that kangaroos *need* to be ‘managed’ (i.e. killed). We know macropods are well adapted to this country’s environmental conditions; they and their common ancestors have had 20 million years in which to evolve their unique biology. Breeding to the conditions (including embryonic diapause in some species) along with breeding controlled by the alpha male have enabled kangaroos to manage their own populations over millions of years, with very little top-down predation. This is why undisturbed kangaroo populations in optimal natural conditions tend to stabilise, rather than continually increasing.⁵⁸ Of course, kangaroos also die of natural causes: infection, stress myopathy, age, predation, the well-known disasters of bushfires and flooding and human factors such as vehicle collisions. We need strong leadership from the top that accepts the right of macropods to exist in abundance in their natural state as our primary native herbivore, and to change the narrative from ‘plague’ to ‘natural wonder’ when one has the good fortune to see a mob bounding across their range.

Coexistence

The kangaroo industry perpetuates the unjust demonisation of kangaroos, with no recognition of their ecological benefits. The social acceptance and logistical ease with which a kangaroo shooter can be contracted actively disincentivises more modern and humane means of coexistence. In a time of mass extinction and biodiversity decline, we should be doing our utmost as a society to overcome colonial

⁵⁴ Mjadwesch R (2011) *Nomination to List the Large Macropods as Threatened Species under the NSW Threatened Species Conservation Act 1995*. <https://www.kangaroosatrisk.net/6-kangaroo-myths--legends.html>

⁵⁵ There is no technical definition for how many kangaroos are too many, so ‘overabundant’ is a subjective label given to however many kangaroos are not wanted by land managers.

⁵⁶ Croft et al., ‘Thought again’.

⁵⁷ Gullone, E. (2012). Profile of the Australian Kangaroo: A Media Analysis. Voiceless. p.12. <https://voiceless.org.au/wp-content/uploads/2014/03/Gullone-FINAL-Kangaroo-Report-for-Voiceless-June-2012.pdf>

⁵⁸ Kangaroos at Risk (2015) www.kangaroosatrisk.org/biology; <https://vickangas.org/blog/f/mythbusting-with-the-yvlc-mob>

attitudes and prioritise the wellbeing of our keystone native species. Once killing has been taken off the table as an option, we can commit to developing innovative coexistence methods. With the financial resources previously dedicated to upholding the kangaroo industry, the NSW government could commit to world-leading research and implementation of non-lethal coexistence solutions. One need only look to ‘networked outdoor organic communication hubs’, as developed by the Waite Institute of the University of Adelaide as an example of what intelligent people can achieve when they are committed to wildlife-friendly solutions. Instead of New South Wales footing the bill for the attempted ‘regulation’ of a dangerous wildlife trade that risks community health and safety, their contributions would be better spent in preserving critical natural heritage, promoting ecotourism opportunities, and enhancing our international reputation.

Additionally, we need to support innovations that will reduce rates of road trauma, mandate wildlife-friendly fencing, maintain habitat and wildlife corridors, and increase penalties for cruelty.

Ecotourism

Ecotourism Australia defines ecotourism as: *‘Ecologically sustainable tourism with a primary focus on experiencing natural areas that fosters environmental and cultural understanding, appreciation and conservation’*.⁵⁹

According to the Australian Trade and Investment Commission: ***‘Demand for nature-based tourism experiences has grown. Visitors are choosing to connect more with Australia’s many unique natural and cultural assets. From 2014 to 2023, nature-based activities among Australians has seen an overall growth of 47% in demand.’***⁶⁰

With the rapid growth of lucrative nature-based tourism, VKA suggests that there are far more jobs and money for NSW through the development of infrastructure for quality ecotourism experiences where visitors can safely view and learn about wild kangaroos. This would also provide opportunities for First Nations Peoples to be part of education programs for residents and tourists to understand the spiritual, cultural and ecological importance of this ancient species.

Kangaroos are iconic to Australia, and a key draw card for international visitors. Many residents have not even had the privilege of seeing a wild mob. With guided kangaroo-watching experiences scarce, there's vast potential for developing a world-class ecotourism industry that respectfully showcases these incredible and engaging animals in their natural habitat.

⁵⁹ <https://ecotourism.org.au/community-resources/what-is-sustainable-tourism/>

⁶⁰ Tourism Research Australia, via Austrade. <https://www.austrade.gov.au/en/news-and-analysis/news/the-rise-of-nature-based-tourism-in-australia>

Conclusion

In light of the arguments presented, VKA staunchly disavows the NSW Government's continued profiteering from wildlife trade, and asserts that the draft Plan can never be considered 'sustainable' or 'ethical' because the population estimates are inherently unreliable, animal suffering is inevitable, adequate compliance monitoring is impossible, and financial interests will always outweigh the many legitimate objections. It is grossly irresponsible to uphold an industry that exploits wildlife for short-term gain, particularly given the escalating biodiversity crisis and mass extinction event, the unknown impacts of epizootics like H5 bird flu, and the risk to human health of zoonotic spillover events, potentially pitching Australia as the epicentre of the next global pandemic. The draft Plan clearly fails to meet community expectations, and will subject us to continuing well-deserved international condemnation. The allegations of governance failures, which appear to be designed to favour Industry while simultaneously providing false assurances to the public, is of grave concern; the public expectation of honesty and accountability, and the upholding of its standards, cannot be met under present conditions.

Kangaroos have an inherent right to thrive in their native habitat, and it is our moral responsibility to protect and conserve them. Rather than reinforcing outdated notions to legitimise persecution and exploitation, the NSW government should focus on developing strategies for coexisting with our unique wildlife and promoting nature-based tourism that values and respects kangaroos.

VKA urges the NSW Government to prioritise education, conservation, and respectful coexistence with kangaroos. We call for an end to the relentless killing of kangaroos for profit and convenience, and a shift towards a more ethical and sustainable approach to wildlife management. We look forward to a future where kangaroos are justly valued and protected, before it is too late.

Victorian Kangaroo Alliance

info@vickangas.org

www.vickangas.org

We acknowledge the Traditional Owners of the lands where we live and campaign, recognising sovereignty was never ceded. We pay our respects to their Elders past and present. We acknowledge their deep spiritual connection to Country and their customs that have nurtured this land. We honour their Creator Spirits and Sacred Totems and the one we are sworn to protect, the majestic Kangaroo.
