

National Code of Practice for the Shooting of Kangaroos and Wallabies for Commercial Purposes

**Submission by the Australian Wildlife Protection Council
9 December 2019**

INTRODUCTION

“The National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes outlines an achievable minimum standard of humane conduct with regard to the shooting of kangaroos and wallabies. The code was endorsed by the Natural Resource Management Ministerial Council (NRMMC) on 7 November 2008. The NRMMC consists of the Australian state, territory and New Zealand government ministers responsible for primary industries, natural resources, environment and water policy.

The National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes is currently being reviewed through a project led by AgriFutures Australia. The review is being informed through a reference group of representatives from the Australian Veterinary Association, the RSPCA, industry and relevant government agencies”.

The Australian Wildlife Protection Council (AWPC), established in 1969 by Arthur Queripel, is a voice for Australia’s wildlife and for all Australian species.

The AWPC states that:

- Humane is not a word that can be associated with the practice of commercialising the killing of Kangaroos, either in the micro detail of individual cruelty, nor in the macro scale of mass killings of families of dependent animals and the destruction of the structure of the mob by removing adults and large animals;
- The reprehensible assertion that early stage pouch young do not feel pain is both highly questionable and unlikely, a scientific challenge would require some considerable research, and this needs to occur; and
- The code has been and will continue to be impossible to enforce or check for compliance in any practical or safe way (this is freely admitted by state authorities).

The AWPC believes that the *National Code of Practice for the Shooting of Kangaroos and Wallabies for Commercial Purposes* is a government endorsed document designed to conceal from international and domestic observers the fact of immense harm being caused to Australian wildlife by a cruel and unsustainable industry. There is no practical way the code can be supervised or enforced. A key issue remains the use of the word humane to describe the intensely cruel killing, with all its ‘tricks of the trade’.

AgriFutures Australia will need to begin using a new term to describe how animals are treated during 'harvest'. 'Humane' it is not, unless the industry and regulators are of the opinion that death by distance shooting is humane, and (against the international tide of opinion which was firm when it considered the clubbing of seal pups) that beating small animals to death, is humane. Nor is it humane to not consider what happens to at-foot joeys when their mother is killed.

The RSPCA state that:

"The RSPCA would like to see the way in which Kangaroos are managed in Australia significantly improved – but for the purpose of this public consultation process, we are particularly concerned about the cruelty associated with non-commercial and recreational Kangaroo shooting. Currently non-commercial shooters don't have to pass a competency test, and don't have to undertake mandatory training. There is also no oversight and little incentive to comply with animal welfare standards. We see this as the greatest immediate risk to the humane treatment of Kangaroos".

BACKGROUND

*"Worldwide, large mammals are under threat due to habitat loss and fragmentation, overharvest, and human-wildlife conflict. Because resources for conservation are limited, accurate population estimates are needed to determine trends in mammal populations and to guide interventions for maximum benefits. For declining species, inaccuracy or bias in population estimates is not just an academic issue but can actually hinder conservation by causing misallocation of scarce resources. **In time series of population estimates, poor survey data can introduce spurious trends or obscure real ones.** Thus, determining the accuracy of survey methods for mammals is critical".*
Testing the Accuracy of Aerial Surveys for Large Mammals, PMC, October 2016, Alfred L. Roca, Editor (Africa study)

Australia leads the world in mammal extinctions, and a new wave of endangerment of Australian species is occurring because of climate change (for which, the impacts on wildlife are obvious). Endangerment by government conduct, which has become increasingly aggressive in allowing the killing of wildlife, and cultural attitudes, many of which have been created by marketing and various other campaigns to denigrate Australian species, specifically Kangaroos.

It should be noted that the “value’ of Kangaroos is that they are a keystone species in maintaining ecosystem despite a series of claims to the contrary which are generally nonsense and constructs to justify the killing.

The recent announcement of the merger of the Commonwealth Government’s Agriculture and Environment Departments further disenfranchises Australian species and moves yet further away from a balanced approach to caring for the outcomes for Australia’s wildlife. The impacts of this, given current and extreme conduct in relation to numerous Australian species, are likely to be devastating for Australia’s wildlife. Macropod species will be in the front line of these impacts.

Similar changes of responsibilities have occurred at state level affecting individual species such as birdlife and Macropod species. These changes make it difficult to identify responsibility and accountability within government departments and diffuse responsibility for standards of governance.

Extinctions include a number of Macropod species and broader family, many other are endangered or critically endangered. There are numerous regional extinctions. These processes of endangerment and extinctions have occurred through similar processes to those occurring today. These processes include patterns of land use including deforestation and land clearing, hunting and commercial exploitation since settlement that has funnelled down to the mass killings of the large Macropod species for commerce and farmer convenience to the present day.

Six species of Macropods are ‘commercially harvested’ four on the mainland and two in Tasmania. The mainland species are the Red Kangaroo (Queensland, New South Wales, South Australia, and Western Australia), the Eastern Grey Kangaroo (Queensland, New South Wales and Victoria), the Western Grey Kangaroo (New South Wales, South Australia, and Western Australia) and the Common Wallaroo (Euro) (Queensland, New South Wales and South Australia). In Tasmania the Bennett's Wallaby and the Tasmanian Pademelon are ‘harvested’.

As in many exploitative industries unsustainable ‘harvesting’ has led to the prey switching to new species which is now occurring along with the expansion of operational areas, where the industry is now shooting Kangaroos, South Australia and Victoria are among recent examples.

Where we are today and given current circumstances, the pressures on Australian wildlife are more extreme than they have ever been. The factors described here must be taken into consideration while State and Commonwealth Governments continue to support and promote this unseemly industry.

We will discuss numbers and quotas within the main body of the document. Here is the current status for this group of animals including associated species to the east of the Wallace Line.

Extinct

- Broad-faced Potoroo *Potorous platyops*
- Central Hare-wallaby *Lagorchestes asomatus*
- Crescent Nailtail Wallaby *Onychogalea lunata*
- Desert Rat-kangaroo *Caloprymnus campestris*
- Eastern Hare-wallaby *Lagorchestes leporides*
- Nullarbor Dwarf Bettong *Bettongia pusilla*
- Toolache Wallaby *Macropus greyi*

Critically endangered

- Black Dorcopsis *Dorcopsis atrata*
- Dingiso *Dendrolagus mbaiso*
- Gilbert's Potoroo *Potorous gilberti*
- Golden-mantled Tree Kangaroo *Dendrolagus pulcherrimus*
- Tenkile *Dendrolagus scottae*
- Woylie *Bettongia penicillata*

Endangered

- Banded Hare-wallaby *Lagostrophus fasciatus*
- Bridled Nailtail Wallaby *Onychogalea fraenata*
- Calaby's Pademelon *Thylogale calabyi*
- Goodfellow's Tree Kangaroo *Dendrolagus goodfellowi*
- Huon Tree Kangaroo *Dendrolagus matschiei*
- Long-footed Potoroo *Potorous longipes*
- Mountain Pademelon *Thylogale lanatus*
- Narbalek *Petrogale concinna*
- Northern Bettong *Bettongia tropica*
- Proserpine Rock-wallaby *Petrogale persephone*

Threatened and vulnerable

- Bennett's Tree Kangaroo *Dendrolagus bennettianus*
- Black-footed Rock-wallaby *Petrogale lateralis*
- Black Wallaroo *Macropus bernardus*
- Bridled Nailtail Wallaby *Onychogalea fraenata*
- Brush-tailed Rock-wallaby *Petrogale penicillata*
- Burrowing Bettong *Bettongia lesueur*
- Cape York Rock-wallaby *Petrogale coenensis*
- Doria's Tree Kangaroo *Dendrolagus dorianus*
- Dusky Pademelon *Thylogale brunii*
- Grey Dorcopsis *Dorcopsis luctuosa*
- Grizzled Tree Kangaroo *Dendrolagus inustus*
- Lumholtz's Tree Kangaroo *Dendrolagus lumholtzi*
- Monjon *Petrogale burbidgei*

- New Guinea Pademelon *Thylogale browni*
- Parma Wallaby *Macropus parma* (believed to be extinct until rediscovered Kawau Island NZ in 1965, populations also discovered NSW 1967)
- Quokka *Setonix brachyurus*
- Rufous Hare-wallaby *Lagorchestes hirsutus*
- Sharman's Rock-wallaby *Petrogale sharmani*
- Seri's Tree Kangaroo *Dendrolagus stellarum*
- Small Dorcopsis *Dorcopsulus vanheurni*
- Tasmanian Bettong *Bettongia gaimardi*
- Vogelkop Tree Kangaroo *Dendrolagus ursinus*
- Yellow-footed Rock-wallaby *Petrogale xanthopus*

The rest

- Agile Wallaby *Macropus agilis*
- Allied Rock-wallaby *Petrogale assimilis*
- Antilopine Wallaroo *Macropus antilopinus*
- Black-striped Wallaby *Macropus dorsalis*
- Brown Dorcopsis *Dorcopsis muelleri*
- Eastern Grey Kangaroo *Macropus giganteus*
- Godman's Rock-wallaby *Petrogale godmani*
- Herbert's Rock-wallaby *Petrogale herberti*
- Long-nosed Potoroo *Potorous tridactylus*
- Lowland's Tree Kangaroo *Dendrolagus spadix*
- Macleay's Dorcopsis *Dorcopsulus macleayi*
- Mareeba Rock-wallaby *Petrogale mareeba*
- Musky Rat-kangaroo *Hypsiprymnodon moschatus*
- Northern Nailtail Wallaby *Onychogalea unguifera*
- Purple-necked Rock-wallaby *Petrogale purpureicollis*
- Red Kangaroo *Macropus rufus*
- Red-legged Pademelon *Thylogale stigmatica*
- Red-necked Pademelon *Thylogale thetis*
- Red-necked Wallaby *Macropus rufogriseus*
- Rothchild's Rock-wallaby *Petrogale rothschildi*
- Rufous Bettong *Aepyprymnus rufescens*
- Short-eared Rock-wallaby *Petrogale brachyotis*
- Spectacled Hare-wallaby *Lagorchestes conspicillatus*
- Swamp Wallaby *Wallabia bicolor*
- Tammar Wallaby *Macropus eugenii*
- Tasmanian Pademelon *Thylogale billardierii*
- Wallaroo (Euro) *Macropus robustus*
- Western Brush-wallaby *Macropus irma*
- Western Grey Kangaroo *Macropus fuliginosus*
- Whiptail Wallaby *Macropus parryi*
- White-striped Dorcopsis *Dorcopsis hageni*
- Unadorned Rock-wallaby *Petrogale inornata*

THE TREATMENT OF KANGAROOS IN AUSTRALIA

Ethics, cruelty and the law

Issues of transparency here are critical so we need to understand which animal welfare organisations, whom it is claimed helped develop the code have actually endorsed it? The same is the case for vague statements that “a consultant with expertise in Kangaroo welfare was appointed to lead the review” Who is this individual?

Given the vast amount of evidence to the contrary, which is easy to obtain, the AWPC finds it difficult to understand how both the RSPCA and the Australian Veterinary Association have agreed to the project group making the statements that appear in the document. There is nothing humane about the commercial exploitation of Australia’s Kangaroos.

The Australian trade in wildlife and specifically the Kangaroo industry in Australia is recognised internationally as the most cruel and extensive exploitation of land-based mammals on Earth.

Among other things the revised code states:

“The two methods suitable for the euthanasia of unfurred pouch young are cervical dislocation and decapitation. Since unfurred young (with closed eyes) are considered to be still in a state of unconsciousness (and therefore not capable of experiencing pain), these methods are unlikely to cause suffering and are therefore considered acceptable”.

Yet again these claims are highly dubious.

The following describes a common practice for ‘furred’ joeys, which the code attempts to change.

“The concussive blow must be conducted so that the joey’s head is hit against a large solid surface that will not move or compress during the impact (e.g., the tray of a utility vehicle). Animals must not be hit against the utility rack or held upside down by the hindquarters or tail and hit”.

Our rhetorical question here is, how will the code in relation to young and dependant Kangaroos be supervised? The reality is that it cannot be supervised and current practices will continue and history demonstrates this.

There is a vast amount of evidence that at foot joeys are left to die of starvation or predation after their mothers are shot, adding yet another dimension of extreme cruelty to this industry.

The extreme cruelty does little to promote Australia in the eyes of the world and through social media it is likely that reputational damage will continue to grow. International commentators on the matter include influential celebrities like Brigitte Bardot, Paul McCartney and Priscilla Presley. As well as ecologists and ethicists like Professor Peter Singer.

It appears that the negative and now increasing global dislike for the industrialisation and persecution of Kangaroo species is recognised by AgriFutures and is hence the reason for the 2019 review of the *National Code of Practice for the Shooting of Kangaroos and Wallabies for Commercial Purposes*.

The review document must therefore avoid being regarded as a marketing document that attempts to disguise the unsupervised and cruel nature of the industry where submissions such as this one, describing both the consequences and the conduct of the industry are not taken into account.

It is worth making clear at this point that nothing stated within the review document or its web preamble *Public Consultation Background Information Sheet* concurs with what we know and have seen since 1969. Our view is that AgriFutures Australia is well aware of the circumstances, cruelties and histories of this industrial scale use of Australian wildlife. There is a long term and evident pattern of the disregard for laws, and indeed, proper supervision of them.

Adult Kangaroos are required to be brain shot, something that is very hard to do in the night-time field conditions and true to standards in these matters, neither State Governments nor the Commonwealth Government of Australia (where the Kangaroo sits proudly above its parliamentary entrance) appear to actively carry out site inspections.

All this occurs out of sight, generally in remote places and remains largely unsupervised. The harvested Kangaroos have a number of body parts removed, including their heads, a gruesome dismemberment. This makes any inspection regarding compliance in relation to shooting requirements extremely difficult as the head would be required to carry out the inspection.

“At present, there is no national database of the results from the Kangaroo inspections, although one is being developed. Reports about rejected Kangaroos seem to be confined to stating whether a carcass was fully or partially condemned. There are no records in any detail, and there are no specific records of Kangaroos condemned because of bullet holes. It is a general requirement that body-shot Kangaroos be condemned and the processor be informed of this, but nothing is recorded of this action. No record could be obtained of a Kangaroo being rejected by AQIS on the basis of being body-shot during this survey.”

The above is an extract from Australia's Commonwealth Government Department of Environment website regarding a survey prepared for Environment Australia by RSPCA Australia in July 2002. The project was *A Survey of the Extent of Compliance with the Requirements of the Code of Practice for the Humane Shooting of Kangaroos*. Eighteen years on there are still no record of the national database described above.

In its *Public Consultation Background Information Sheet* and despite the severe impacts of climate change on wildlife populations AgriFutures states that:

“Research conducted over decades has examined the impacts of harvesting and has found no evidence that current harvesting practices threaten Kangaroo populations. The primary driver of Kangaroo populations is rainfall; therefore the overall numbers of Kangaroos will decline as a result of severe drought. Harvesting does not prevent the Kangaroos’ natural ability to recover quickly following drought”.

Given the evidence the above assertions cannot be correct and it is not logical, given the no-one is asserting that ‘harvesting’ stops post-drought recovery per se, while having many other deleterious effects on Kangaroo populations. For example, the loss of alpha males and mob structure, and shooting of younger and younger animals to keep up quotas.

Here is an example of what has recently occurred in Victoria. The species is the Red Kangaroo.

RED KANGAROOS IN VICTORIA

In the year 2000, Victorian Government figures showed that the population of Red Kangaroos in Victoria was at around 6,000. In 2017 amidst claims of exploding populations of Kangaroos, the Victorian Government conducted an aerial (mostly) survey of species of Kangaroo that it wanted to make available to the Kangaroo industry. That is the Eastern and Western Grey Kangaroos and the Red Kangaroo.

In the 10-year period between 2009 and 2018 the Victorian Government had issued permits (Authorities to Control Wildlife or ATCWs) to kill 49,141 Red Kangaroos in the State. That is more than 8 times their year 2000 population estimate. In 2010 the Victorian Government had issued permits (ATCWs) to kill a modest 15 Red Kangaroos, in 2017 they issued permits (ATCWs) to kill a 15,187 Red Kangaroos in that year.

Back to the 2017 survey, 23 Red Kangaroos were counted and this was then extrapolated to a population estimate of 13,000 for that year. Having found very few Kangaroos at all in 2017, the Victorian Government had another go at a survey, this time they came up with a Red Kangaroo population of 44,000 and this time they had counted 104 Red Kangaroos.

The numbers become even more puzzling when we include young Red Kangaroos (joeys), which are killed by the methods described in the revised code (both suggested and banned methods). Young Kangaroos are not counted in the killing. So let's say the permits the Victorian Government issued would be responsible for an additional 22,113 Red Kangaroos being massacred over the 10- year period described.

So all up, from a population estimate of 6,000 Red Kangaroos in the year 2000, permits (ATCWs) were issued covering 71,254 Red Kangaroos including young. Add another, say, 6,000 Red Kangaroos for the permits issued in the years 2000 to 2008 plus young at 2,700. All up the permits (estimate) issued to kill Red Kangaroos in the period since 2000 cover 79,954 animals.

This killing of course also takes out the next breeding generation, as the Victorian Government requires that all dependent young must be killed. So in 2018 we still end up with a Victorian Government population estimate of 44,000. This means there are still plenty more to kill?

We can conclude that there is something very wrong with the 'management' of Kangaroos and something very wrong with the distortion in numbers that gives such an extreme population error for a particular species.

CALIFORNIA, KANGAROO TRADE PLACING THE AUSTRALIAN GOVERNMENT IN A DEMEANING AND DEGRADING POSITION (2015-16)

The Californian Government's Fair Political Practices Commission warned the Australian Government to stop their underhand tactics to restart the trade in Kangaroo products into California in 2015. The warning letter was issued after an investigation confirmed the Australian government violated California's lobbying laws with undeclared payments made to influence the Californian legislative process. Californian daily newspaper, the Sacramento Bee, has described the events as 'unsavoury foreign government interference and industry money to influence with local government decision-making'. They labelled the world of Kangaroo lobbying as 'swampy'.

SHORT MEMORIES – Victoria continued

"Commercial use of culled Kangaroos was undertaken in Victoria in the 1980s to test the viability of a Kangaroo industry in this state. It did not prove to be viable. The Department of Natural Resources and Environment (DNRE) concludes that the industry failed at that time because of the low numbers of Kangaroos available, and the distances to be travelled between properties and points of processing, which made it uneconomic for the industry to continue. Commercial utilisation of Kangaroos has not been permitted in Victoria since that time". Parliament of Victoria - Environment And Natural Resources Committee,

KPFT AND BROKEN PROMISES

“Despite the general acknowledgment that sound research and development work is essential to the success of developing industries, most of the utilisation sectors reviewed by the Committee still face significant gaps in required knowledge. The Committee was interested in the role that existing research bodies may have in generating the required information and the extent to which their current programs and processes may be of assistance”.

Parliament of Victoria - Environment And Natural Resources Committee, Inquiry into the Utilisation of Victorian Native Flora And Fauna June 2000 - No 30 Session 1999/2000 VICTORIAN GOVERNMENT PRINTER 2000

Victoria returned to the commercial killing of Kangaroos with the Kangaroo Pet Food Trial (KPFT) in March 2014 amid marketing type claims in the media of exploding populations of Kangaroos. The present call for input to the code should be well aware that ‘exploding’ Kangaroo populations has been an unsupported catchcry for killing whether commercial or non-commercial for the past century.

The trial was commenced without any understanding of the Victorian populations of the three target species on Kangaroos. As already reported in the discussion on the Red Kangaroo an initial population survey was conducted in 2017 counting a total of 2,630 Kangaroos across the three target species.

Speaking about the KPFT, Peter Walsh, the former Victorian Agriculture Minister stated:

“It 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.”

The subsequent and initially secret DELWP report *Kangaroo Pet Food Trial Evaluation* stated that:

“However there has been a disproportionate increase in the number of Kangaroos approved for control in trial areas, compared to non-trial areas since the commencement of the trial. Over the period of the trial the average number of Kangaroos approved for control in trial areas was nearly 250 per cent higher than the long-term average. The deviation from the long-term average is much larger in trial areas than in non-trial areas. This is primarily due to KPFT authorisations being issued, on average for larger numbers of Kangaroos than type 1 ARCWs”.

The DELWP report also found that:

“There had been major offences against the wildlife act including the misallocation of Kangaroos against KPFT authorisations; overshooting the authorised number of Kangaroos; shooters possibly providing incentives, including money, to ‘landholders’ for access to Kangaroos and landholders claiming false and misleading information on applications (i.e. Claiming damage or higher numbers of Kangaroos).”

The addition of KPFT authorisations coincided with the Victorian Labor Government’s significant increase in the number of ATCW permits being issued for Macropod species, including the three commercial target species. The result is a devastating impact on Kangaroo populations in Victoria.

“Sound development of a new industry is dependent on good information relating to all stages of utilisation, from production (wild-harvest or cultivation) and processing to marketing. Ecological sustainability depends heavily on well-informed management”.

Parliament of Victoria - Environment And Natural Resources Committee, Inquiry into the Utilisation of Victorian Native Flora And Fauna June 2000 - No 30 Session 1999/2000 VICTORIAN GOVERNMENT PRINTER 2000

Populations of the three species subject to the KPFT have been devastated in Victoria because 750,000 Kangaroos were authorised to be killed by ATCW / KPFT permits in the years 2014 – 2018. The number of Kangaroos authorised roughly doubled once the pet food trial really got underway despite government statements that there would be no increase in killing rates once the trial commenced. 390,886 of these animals were authorised under KPFT of which around 212,000 were actually processed.

“On balance, it appears that the behaviour of some KPFT shooters, who have and 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. Given that Kangaroo populations vary, a program to process carcasses within the ATCW system cannot guarantee the steady supply that is preferable to shooters and processors”. Kangaroo Pet Food Trial Evaluation, DEWLP, 2017

In 2017 the Victorian Government issued 2,841 ATCWs to ‘control’ 189,000 Kangaroos excluding their dependent young. That is 161,000 Eastern Grey Kangaroos, 12,568 Western Grey Kangaroos and 15,187 Red Kangaroos. The

number of Kangaroos subject to ATCWs in 2011 was 34,721 comprised of 33,539 Eastern Grey Kangaroos, 1,162 Western Grey Kangaroos and 20 Red Kangaroos.

So the total number of Kangaroos killed in 2017 was 5.44 times greater than the number in 2011. In addition, in 2017 the Victorian Government issued 125 ATCWs for two species of Wallaby to 'control' 1,154 animals. In 2017 DELWP issued just 10 ATCWs (a measure of their narrow distribution) to 'control' 15,187 Red Kangaroos, in 2011 they issued 3 ATCWs to control just 20 Red Kangaroos.

POPULATION ESTIMATES AND QUOTAS

"The government, the industry and the media cannot describe the Kangaroo industry in Australia as "sustainable" if no-one knows how many animals have been / are being killed. Note that as well as the damage mitigation and commercial killing, some states have "recreational" permits, and no-one even tries to guess how many kangaroos are shot illegally, or how many die in fences and on roads every year – these factors are ignored by "harvest" models". Consulting Ecologist R Mjadwesch

How we perceive the population estimates

In 2001 the Australian Government claimed that for just four 'harvest' species (species of Kangaroo subject to a commercial trade in wildlife are declared 'harvest' species) the population in the four major mainland states where these species exist and were part of the commercial trade in wildlife in the zones where they are exploited was 57,430,026. The species were the Red Kangaroo, the Eastern Grey Kangaroo, the Western Grey Kangaroo and the Wallaroo.

Here is what happened in Queensland to one of those four harvest species, the Eastern Grey Kangaroo. Out of the total population estimate for 2001 for Australia of 57,430,026 animals, 37,574,300 were from Queensland, of which 22,891,800 were Eastern Grey Kangaroos. That is a lot of Eastern Grey Kangaroos in one state and Queensland's share of the total Kangaroo population for these four 'harvest' species was 65.4 per cent.

Despite the endless claims of booming populations and the ever increasing places in which Kangaroos were being killed as a result of these claims, by the time we get to 2011 the Australian Government estimates for these four species in the four states was 34,303,677, again Queensland's reported share of these animals was high at 59 per cent. This leaves a total population for the rest of the three Australian mainland states 'harvesting' Kangaroos for these four species at 13,958,434.

Despite some of the most appalling drought conditions on record and the mass killing of Kangaroos across a range of 'legal' and illegal mechanisms the 2018 population of these species was estimated at an improbable 42,000,000.

Now for a reality check. At the beginning of November 2019 the Queensland Government announced that it would stop Kangaroo harvesting for 2020 for the Eastern Grey Kangaroo in the central (shooting) zone, both northern and southern parts of this zone (this is a vast area in Western Queensland stretching 1500 kilometers from above Richmond in the north to the New South Wales border in the south, and stretching west along the New South Wales border to the South Australian border). There is also a ban for the gentle and persecuted Wallaroo, which has now been driven to the edge of extinction in Victoria.

For New South Wales in 2017 here are the Kangaroo quotas v actual (proportion) set by its government and by region. For the Eastern Grey Kangaroo the proportion shot from the available quota is in a range of 1 per cent to a maximum of 30 per cent of the quota (highest was in Upper Hunter in the Northern Tablelands Zone, which has been running since 1991), with an average across the zones of 8% of the quota for this species. For the iconic Red Kangaroo the range was from 3 per cent to 12 per cent of the quota, the average of quota take for this species was 9 per cent. For the Western Grey Kangaroo the range was from 2 per cent to 9 per cent of the quota, the average of quota take for this species was just 5.7 per cent. For Wallaroos, no quota in 11 of the 14 shooting zones, with very low numbers counted with an average of 27 per cent of the quota shot in the operational zones.

Victoria, new to the industry (banned in the state in 1982) in its extensive and recent Kangaroo surveys shows the Victorian Government were able to count just 23 Red Kangaroos and 2,607 Grey Kangaroos (both Eastern and Western Greys) In 2017 and in a much more extensive survey in 2018 they counted just 104 Red Kangaroos and 4,609 Grey Kangaroos (again this figure includes both Eastern and Western Grey Kangaroos).

To conceptualise these often quoted and vastly exaggerated population estimates think about this.

Taking the 2001 figure of 57,430,026 for the four 'harvest' species Kangaroos. For the four species and in four states discussed here we are saying that giving population equivalents (swapping people for Kangaroos) that somewhere in these four states there should be the equivalent of eleven cities the size of Sydney plus one around the size of Brisbane, cities populated by just four species of Kangaroo. Or as an alternative, we can imagine one greater Tokyo with its 38 million Kangaroos plus another 20 million or so in four Sydney sized cities.

These numbers are simply not credible.

QUOTAS

What is happening to the quota system in Australia can be described by the Queensland example from 2017:

"The Queensland Government's statistics tell us that in the 2017 harvest period, only 26.4 per cent of the commercial harvest quota was

utilised, with the highest percentage of quota used being 37 per cent for the Wallaroo and 36 per cent for Eastern Grey Kangaroos in the central zone where for 2020 shooting will be stopped. Figures available on 31 August 2018 show that 17 per cent of the available quota for Red Kangaroos in the Western Zone had been harvested with 14 per cent and 8 per cent of the quota harvested in the central and eastern zones respectively. For Eastern Grey Kangaroos, 22 per cent and 8 per cent of the quota had been harvested in the central and eastern zones respectively. For Wallaroos, 19 per cent and 14 per cent of the quota had been harvested in the central and western zone, only 2 per cent of the quota was harvested in the eastern zone. Given these figures, it is unlikely that quotas will be met for each species in each zone in 2018".
Peter Hylands, President, AWPC

There is a significant problem with differentiation of species in relation to the Kangaroo industry and management of populations and quotas. The concern for this particularly matter appears to have evaporated and in part defines the increasingly brazen behaviours of the industry and those who administer it.

"Eastern and Western Grey Kangaroos cannot be distinguished during the aerial population surveys, however NSW has made an attempt at separating out the species as a proportion of what they count during ground surveys (this is based on data from ~2000, so it is long out of date), and so have Victoria. Queensland have never bothered to even try to differentiate the species, and they do not provide population estimates or quota for Western Grey Kangaroos, however they would certainly form part of the take in Queensland. This issue was a problem for those with oversight on the industry in the 1980s, but this concern is no longer apparent". Consulting Ecologist R Mjadwesch

Across all shooting zones the percentage as a proportion of the quota is decreasing. This is an indication that constantly inflated population estimates are generating more and more unachievable quotas. In the old days the quota was supposed to limit take – today quotas in no way limit the killing – the shooters can shoot as many kangaroos as they can find and never meet the quota. Consulting Ecologist R Mjadwesch

South Australia has recently proposed, under their own review, dropping the quota system. This change will mean that it will become increasingly more difficult to track the trajectory of Kangaroo population numbers. To give some substance to this point, in South Australia in 2017, the commercial Kangaroo 'harvest' was 103,929, just 13% of the approved quota of 789,500 (which included the special land management quota). In 2018 (to August) 71,536 Kangaroos had been 'harvested', just 9 per cent of the quota.

COMPETITION BETWEEN COMMERCIAL KANGAROO INDUSTRY, LAND HOLDERS AND RECREATIONAL SHOOTERS

"A lot of people who I have spoken to have told me that they are putting in the fences to control the migration of kangaroos, to clean inside those fences out so they can run more stock per acre". ABC Southern Queensland, 9 April 2019

The killing rates, legal and illegal across a range of instruments are amplifying the problem of assessing populations and managing governance issues. The levels of extreme cruelty have also risen in line with this competition.

A CHANGE OF HEART

You will note from the quote below (Commonwealth Government on illegal killing of Kangaroos, 1982) and from the quote in relation to attitudes to culling just how sharply the rhetoric from politicians and public servants has changed over the last 40 years or so. Today Kangaroos are killed on mass and with little thought of the consequences. We can only ask why such a significant shift in ethical standards has occurred Australia wide?

"From a welfare point of view, there is probably little difference between the various forms of illegal shooting by professional shooters and legal shooting by professional shooters. However, Kangaroos are protected animals and may only be killed when permission has been given by a fauna authority. Illegal killing for whatever reason, cannot be condoned in any circumstances. The fact that Kangaroos may be perceived as pests by some landholders is not an excuse to kill them without permission or to kill them in a way that is likely to cause suffering. Fauna authorities are denuded of resources making enforcement of wildlife regulations virtually impossible. This exacerbates the problem because those people who resort to illegal killing realise they can carry out such activities with virtual impunity from prosecution". Commonwealth Government on illegal killing of Kangaroos, 1982

PEOPLE

The AWPC cares about people too and the devastating impact the commercialisation of wildlife has on so many people. For example, the thoughtless and irresponsible behaviour of the Victorian Government, does not consider the impact of its cruel policies on many people who live in regional Victoria and do not want to see the wildlife around them slaughtered in the many disgraceful and cruel ways in which this now occurs. While at the same time a recent Federal Government Department of Health report promotes the health benefits to hunters of killing animals by hunting, which is nonsense of course,

while not one thought is given to the danger, abuse, grief and loss, anxiety, damage to people and properties, done by the extraordinary act of allowing both shotguns and high powered rifles to be used to kill a range of native animals.

“Decapitated, disembowelled and left to rot. Kangaroo carnage at a Victorian holiday hotspot has horrified residents, visitors and tourism operators. WARNING: GRAPHIC IMAGES. Tourism operators and residents in the holiday town of Dunkeld were horrified when dozens of kangaroos were shot in the dead of night, then decapitated, disembowelled and left to rot in fields close to homes. The animals’ heads, tails, paws and entrails were left behind, alarming visitors and residents of the popular tourist hotspot at the southern edge of the Grampians National Park. The mobs are one of the attractions of the area, with many cottages and retreats highlighting the opportunity to meet the roos”. Sunday Herald Sun, 14 December 2019

CONCLUSIONS

The following statement has no basis of fact and cannot be substantiate given the vast amount of evidence over a long period, evidence that describes something very different.

“Kangaroos and wallabies are killed with a shot to the head by skilled professional shooters who hold an appropriate licence issued by the relevant state government”.

The AWPC has identified significant problems relating to the foundations of the commercial Kangaroo industry and these include standards of governance and supervision, the accuracy of population estimates and the unsubstantiated claims that the industry is and can be humane, particularly given the vast amount of evidence to the contrary.

The AWPC also believes that the reputational damage caused to Australia, by this industry and its commercial trade in Australian wildlife, needs to be taken into account as well as the impact of the industry on regional Australians whose properties and lives are impacted by the industry, leaving residents with no rights to defend themselves, their concerns or interests. These things are very far from humane.

The AWPC propose that the *National Code of Practice for the Shooting of Kangaroos and Wallabies for Commercial Purposes* is not amended until such a time that the issues surrounding governance and supervision of the industry, the inaccurate population estimates and their impact on quotas and the unsubstantiated claims that the industry is humane, are properly investigated by people and organisations that have no connection to, or interests in, promoting this industry, and that includes a number of Universities around the country.