

Submission
No 237

**INQUIRY INTO HEALTH AND WELLBEING OF
KANGAROOS AND OTHER MACROPODS IN NEW SOUTH
WALES**

Organisation: RSPCA Australia

Date Received: 23 April 2021



**RSPCA AUSTRALIAN AND RSPCA NSW
JOINT SUBMISSION**

**PARLIAMENTARY INQUIRY
HEALTH AND WELLBEING OF KANGAROOS AND
OTHER MACROPODS IN NSW**

22nd April 2021

Introduction

The RSPCA welcomes the opportunity to provide a submission to the Inquiry into the Health and Wellbeing of Kangaroos and Other Macropods in New South Wales. The comments contained in this submission mainly focus on animal welfare risks and impacts rather than conservation aspects.

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. 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. We believe the Commonwealth and State/Territory Governments should revisit the sustainable use policy with a view to reasserting the necessity for justifying the practice on environmental grounds with key criteria to be met in demonstrating such necessity on a case-by-case basis.

The RSPCA has long advocated for the ongoing application of ethical principles in relation to kangaroo management including that any action needs to be justified, humane and effective (see Attachment 1 RSPCA Policies). In our Policy E02 we state that any measures taken to manage wild animals must recognise that whether the animals are native, introduced or viewed as a 'pest' this does not affect their capacity to experience pain, suffering or distress. We believe that it is important to emphasise this and advocate for management techniques for invasive species that are humane. The RSPCA recognises that kangaroos must be managed to protect their welfare (especially during times of drought) as well as to mitigate negative environmental and agricultural impacts. However, it is also acknowledged that human activities have influenced population dynamics especially in relation to provision of artificial water sources and food resources and that these factors must be considered as part of any management program.

Terms of Reference

With regard to the terms of reference, where the term 'culling' is used we have understood this to refer to non-commercial shooting.

(a) historical and long-term health and wellbeing indicators of kangaroos, and other macropods, at the local, bioregional and state levels, including the risk of localised extinction in New South Wales,

Other than annual aerial population density estimates, the RSPCA is not aware of any other parameters used to appraise the health and wellbeing of kangaroos and other macropods in NSW. Under the [NSW Commercial Harvest Kangaroo Management Plan \(2017-2021\)](#), it is understood that if the annual population density estimate for a specific macropod species is less than the lower threshold for a particular commercial zone, then harvesting is not permitted until the next annual population density survey is undertaken. This approach would appear to help mitigate the risk of localised extinction regarding the impact of commercial shooting. However, it is unclear if landholder permits to shoot kangaroos are still issued in such zones. Logic would dictate that if commercial shooting is not permitted due to low population density estimates, then kangaroo shooting under private landholder permits should also not be permitted.

Potential health and wellbeing indicators of kangaroos and other macropods might include the following;

- body condition
- growth rate of young,
- disease status (i.e., if stressed and/or low body condition, at risk of parasitic disease etc),
- reproductive rate,
- aggressive inter-competition encounters for food within normal parameters,

- motor vehicle collisions,
- activity budget for rest, feeding etc within normal parameters where there are sufficient resources.

(b) the accuracy with which kangaroo, and other macropod, numbers are calculated when determining population size, and the means by which the health and wellbeing of populations is assessed,

- The RSPCA understands that the methodology used to estimate population densities of kangaroos and other macropods has been scientifically assessed to be reasonably accurate. However, we are concerned that high density populations may be identified in some localised areas, especially as kangaroos are forced to areas with higher food abundance due to seasonal conditions but that overall numbers over a regional area may not be high.
- Regarding the means by which the health and wellbeing of populations is assessed, please see comments a) above.

(c) threats to kangaroo, and other macropod, habitat, including the impact of:

(i) climate change, drought and diversion and depletion of surface water sources,

Climate change is a global crisis (Ripple et al 2020) and there is scientific consensus that it is caused by greenhouse gas emissions from human activities (Oreskes 2004). Trends associated with climate change include an increased frequency, intensity and duration of extreme events (IPCC 2014) such as heatwaves, droughts, bushfires and floods.

Considering the Five Domains model of animal welfare (a framework that considers positive and negative physical and affective states) (Mellor & Beausoleil 2015), climate change has wide-ranging negative effects on the welfare of all animals. Animals may suffer thirst, hunger, malnutrition, gastrointestinal pain, starvation and death as climate change threatens global food and water security for both humans and animals (IPCC 2019).

In addition to direct trauma and death, climate change is likely to be associated with diminishing availability, quality and quantity of basic resources including tolerable ambient temperature, clean air, shelter, food and water (Steffen et al 2009). Unable to access these basic resources, wildlife may experience a range of negative affective states including fear, thirst and hunger and ultimately result in death.

For more information on the impact of climate change on animal welfare, please read [‘Climate Change and Animal Welfare - RSPCA Research Report’](#) May 2020.

(ii) bushfires,

The risk of bushfires is influenced by climate change and appears to be increasing. Although kangaroos are more mobile than other Australian native fauna and so have the capacity to flee a fire front, many succumb directly to the heat and/or fire or suffer severe burns. In addition, smoke inhalation over 50km has been reported to be a significant risk to wildlife (Midena 2020).

(iii) land clearing for agriculture, mining and urban development,

Habitat loss and fragmentation are significant threats to the welfare of kangaroos and other macropods. The RSPCA recognises the critical need to prevent these negative impacts.

Habitat loss (degradation and/or destruction) and fragmentation (turning large areas of habitat into smaller disconnected patches) may result from direct land clearing, contamination and/or negative

environmental affects due to human activities including agriculture, plantation harvesting, mining, building construction and other landscape changes.

Habitat loss poses major welfare risks including preventing safe macropod movement across the landscape, restricting expression of normal behaviours and denying animals' access to basic needs such as food, water and shelter. Other impacts include stress, injury, illness, pain, psychological distress and death (Finn & Stephens 2017; Hing et al 2016).

In terms of urban development, the associated welfare issues in managing peri-urban kangaroos are complex and challenging, as they involve balancing prevention of harm to kangaroos whilst solving human-animal conflict situations. As the number of kangaroos in peri-urban areas increases, so does the occurrence of kangaroo-related incidences involving humans, motor vehicles, or property damage. This has negative impacts for the animal, as well as potential social and economic impacts on the local community. Dense kangaroo populations can also disrupt previously stable ecosystems by overgrazing, which then places other native species and ecological communities at risk. In addition, the kangaroos themselves will also suffer from starvation when feed is limited from overgrazing.

Management of these populations requires early and careful planning to ensure the welfare of the kangaroos involved. It is essential that the most humane and effective methods are used. Where lethal control is undertaken, this should only be done as a last resort and after non-lethal options have been considered to be unsuitable. If undertaken by a licenced and competent shooter, culling has been demonstrated to be relatively humane, compared to other methods, for targeted individuals. However, there are risks including extended suffering for animals who are not killed on the first shot, orphan young at foot, or startling animals who flee and may become injured or suffer stress. Culling is generally not supported by local communities, especially if the intent is to remove all kangaroos.

Translocating kangaroos to another natural habitat is very challenging and poses many welfare risks. Whilst the aim of translocation is to be a humane management method that preserves the population, translocation of a large group of kangaroos has been shown to result in many of the animals subsequently dying [Cowan et al 2020]. More needs to be done to determine if this method can improve welfare outcomes for specific populations of peri-urban kangaroos. When significant numbers of kangaroos occur in an area of proposed urban development, a careful assessment of relocation options should be considered well in advance of any land clearing being undertaken.

Currently, management methods have focused on urgently addressing conflict or welfare issues as they arise, rather than proactively implementing strategies preventatively to minimise kangaroo numbers. Many people living in peri-urban areas want to retain a local population of kangaroos, but this can only be achieved through a well-planned collaborative program involving government, land developers, wildlife carers and animal welfare groups. Effective strategies include establishing natural wildlife corridors to encourage movement between natural habitats which provide continuous feed and water access, as well as effective and humane fertility control starting whilst the population is relatively small and manageable.

For more information, read RSPCA Knowledgebase articles;
[How can habitat loss affect animal welfare? - RSPCA Knowledgebase](#)
[What are the welfare issues with managing peri-urban kangaroos? - RSPCA Knowledgebase](#)

(iv) the growing prevalence of exclusion fencing which restricts and disrupts the movement of kangaroos,

There are benefits from exclusion fencing, including welfare gains through reduced maiming and killing from predation of animals within a fenced area. However, there are also welfare impacts on animals on the outside of the fence. These can include injury, distress and prolonged death through starvation, thirst, or exposure. Furthermore, exclusion fences can halt natural wildlife movement patterns and reduce genetic interchange between populations separated by the fence, affecting biodiversity and leading to other ecological impacts (Bradby et al 2014). The impacts of exclusion

fencing is a complex issue, requiring all stakeholders to work collaboratively to overcome the many challenges presented.

While most animals encountering a fence will move along or away from it, some will attempt to go underneath, over the top or push through it. This may result in entrapment. Animals are more likely to injure themselves if they are being chased, are desperately seeking food and water or trying to escape a wildfire. Entrapped or severely injured animals may suffer predation or a prolonged death. Animals prone to entrapment include emus and kangaroos but smaller animals are also at risk including wallabies, echidnas and goannas. Suffering of animals entrapped by fences is rarely alleviated, due to remoteness and limited surveillance to enable rapid intervention. Barbed wire can also inflict painful wounds, further compromising animal welfare.

For more information, read RSPCA Knowledgebase article; [‘What are the risks to wildlife associated with barrier and cluster fencing?’](#)

(d) current government policies and programs for kangaroo management, including:

(i) the method used for setting quotas for kangaroo culling,

The RSPCA understands that non-commercial culling, is capped to ensure cull numbers are ecologically sustainable but the method to determine this is not clear. Furthermore, data for the number of kangaroos actually culled under these licences is not publicly accessible. However, as an indication, 928,807 kangaroos were allowed to be harmed under ‘Licences to Harm Kangaroos’ (LHK) issued between July 2018 and July 2019 (NSW DPIE 2019). If the quotas were all fulfilled, this would significantly add to the number of kangaroos culled each year and bring total cull percentage up to 10% of the population. Furthermore, there is no check on actual numbers culled and so the permitted number could be exceeded significantly.

(ii) the management of licences to cull kangaroos,

With regards to animal welfare, a condition of the LHK permit is that the [National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Non-Commercial Purposes](#) (Non-commercial Code) be complied with. However, there are three major issues which are not addressed including that the Non-commercial Code is over 12 years old and must be reviewed as a matter of urgency especially as the requirements are not as stringent as those outlined in the recently reviewed [National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes](#) (Commercial Code). The RSPCA outlines several key areas where the Non-commercial Code requires reform - see Attachment 2. The second concern is that the Non-commercial Code has a much lower standard than the Commercial Code. The treatment of kangaroos should not be dictated by whether they are being shot for commercial purposes or for damage mitigation. Whenever kangaroos are shot, the same standards of operator training, competency, education, monitoring and enforcement should be applied equally to professional and non-professional shooters to ensure that all kangaroos are killed humanely. And finally, there is no monitoring to ensure that shooting complies with the requirements of the Non-commercial Code.

A community survey conducted by McLeod and Sharp (2014) revealed several important insights including;

- majority of participants (83%) viewed shooting by non-professional marksmen as either ‘very unacceptable’ or ‘slightly unacceptable’,
- participants believed that non-professional shooting was either ‘very inhumane’ (68%) or ‘slightly inhumane’ (18%) and
- forty-one per cent of participants thought that shooting by non-professionals was not effective at reducing overgrazing impacts.

(iii) temporary drought relief policies and programs,

The RSPCA acknowledges that kangaroo populations explode when feed availability is high and that during drought many kangaroos suffer from thirst and starvation, which is a significant animal welfare issue. However, there does not appear to be any evidence showing direct welfare benefits of commercial and/or non-commercial shooting in terms of reducing the number of kangaroos suffering starvation and death during times of drought. On the contrary, thousands of kangaroos continue to starve during drought and no direct action is taken to alleviate this. It is noted that in 2018, the government's drought package included new measures intended to make it easier for landholders to obtain quotas to shoot kangaroos, including no longer requiring kangaroos to be physically tagged once shot. It is understood that these new measures have continued. In the past, mandatory tagging of shot kangaroos provided a mechanism for landholders to be accountable and without this, there is no capacity for checking that the quota allocated has not been exceeded.

(e) current government policies and programs in regards to 'in pouch' and 'at foot joeys' given the high infant mortality rate of joeys and the unrecorded deaths of orphaned young where females are killed,

Shooting females poses significant animal welfare risks due to the inability of shooters to locate and humanely kill ALL dependent young. Furthermore, there is no mandatory training of shooters (either commercial or non-commercial) to successfully locate all dependent young, humanely kill dependent young nor the skills required to confirm death (Sharp & McLeod 2016).

Blunt trauma is the recommended method in the revised 2020 Commercial Code but without appropriate training and competency assessment, welfare is likely to be compromised. Hampton et al (2018) showed some potential welfare improvements using a captive bolt, however, more research is required to verify this. There is a need to develop alternatives to blunt trauma, unless it can be shown that use of this technique in the field is consistently acceptable on animal welfare grounds.

In addition, there is no field monitoring of either commercial or non-commercial shooters to ensure respective codes are complied with regarding the treatment of orphan joeys. The other important aspect is that the numbers of joeys killed and the dependent joeys left orphaned must be included in the total kill figures.

Another concern is that it is not clear as to the welfare risks and biological impacts on social structure due to disruption caused by shooting individuals in mobs. Research is recommended to determine the nature and extent of these impacts.

(f) regulatory and compliance mechanisms to ensure that commercial and non-commercial killing of kangaroos and other macropods is undertaken according to the Biodiversity Conservation Act 2016 and other relevant regulations and codes,

As previously mentioned, there is no field monitoring of shooters to ensure compliance. One option to address this is for operators to wear body cameras which can be downloaded and checked by government regulatory officers.

(g) the impact of commercial and non-commercial killing of kangaroos and other macropods, including the difficulty of establishing numbers killed by landholders since the removal of the requirement for drop tags, and

The current system does not allow verification of actual numbers shot in the field by either commercial or non-commercial shooters. For commercial shooters, it is assumed that because a financial incentive exists to deliver a fatal head shot, that this is sufficient to provide confidence

that ALL kangaroos shot by a commercial shooter will be humane. However, injured and/or non-head shot kangaroos may not be reported by commercial shooters. Ensuring every kangaroo which is processed has been killed by a head shot cannot be verified as the head is removed in the field. This is a flaw in the accountability system especially as the head is often removed very low which may conceal accidental neck shots. With commercial shooters, there is virtually no oversight of the manner in which kangaroos are shot as there is no field monitoring. This is unacceptable especially as shooters are not required to undertake shooting competency assessments.

(h) current and alternative measures to provide an incentive for and accelerate public and private conservation of kangaroos and other macropods.

There is a need for research on non-lethal control methods such as deterrents (sound/scent/visual) to avoid the use of lethal methods for kangaroo management. In many instances, the 'problems' created are as a result of human intervention with the landscape, whether for agriculture, mining or urban development. However, a major challenge remains in relation to what to do when kangaroos are starving and/or dying from thirst during drought. A co-ordination of resources and process is required to address this so they are not left to die a slow, painful death. The only options to alleviate this suffering are humane killing or to provide feed and water but geographical location and practical limitations can essentially dismiss this as feasible.

References

Bradby et al (2014) Ecological connectivity or barrier fence? Critical choices on the agricultural margins of Western Australia. *Ecological Management and Restoration* 15(3):180-190.

Cowan M, Blythman M, Angus J et al (2020) Post-Release monitoring of Western Grey Kangaroos (*Macropus fuliginosus*) relocated from an urban development site. *Animals*, 10(10),1914.

Finn HC & Stephens NS (2017) The invisible harm: land clearing is an issue of animal welfare. *Wildlife Research*, <https://doi:10.1071/WR17018>

Hing S et al (2016) The relationship between physiological stress and disease: consequences for health and conservation. *Wildlife Research* 43:51-60.

Hampton JO (2018) Gunpowder-powered captive bolts for the euthanasia of kangaroo pouch young. *Australian Mammalogy* <https://doi.org/10.1071/AM18009>

IPCC (2014) Intergovernmental Panel on Climate change 2014: synthesis report. Contribution of Working Groups I, II and III to the fifth assessment report of the Intergovernmental Panel on Climate Change.

IPCC (2019) Intergovernmental Panel on Climate Change. Global Warming of 1.5 C An IPCC Special Report on the Impacts of Global Warming of 1.5 C Above Pre-Industrial Levels and Related Global Greenhouse Gas Emission Pathways, in the Context of Strengthening the Global Response to the Threat of Climate Change. <https://www.ipcc.ch/sr15/>.

McLeod SR & Sharp TM (2014) Improving the humaneness of commercial kangaroo harvesting. Rural Industries Research and Development Corporation Publication Number 13/116.

Mellor D & Beausoleil N (2015) Extending the 'Five Domains' model for animal welfare assessment to incorporate positive welfare states. *Animal Welfare* 24:241-253.

Midena K (2020) [Native Australian smoky mouse becomes first species to be killed from bushfire smoke inhalation](#). ABC News

National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes (2020) Commonwealth of Australia. <https://www.agrifutures.com.au/product/national-code-of-practice-for-the-humane-shooting-of-kangaroos-and-wallabies-for-commercial-purposes>

National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Non-Commercial Purposes (2008) Commonwealth of Australia.

<http://www.environment.gov.au/system/files/resources/133025f9-b11c-4083-8960-4bd8e3bed4a8/files/code-conduct-non-commercial.pdf>

NSW DPIE (2019) Public Register of Licences to Harm: August 2017 - July 2019. NSW Department of Planning, Industry and Environment <https://www.environment.nsw.gov.au/licences-and-permits/wildlife-licences/licences-to-control-or-harm/public-register-of-licences-to-harm>

Oreskes N (2004) The scientific consensus on climate change. *Science* 306:1686-1686.

Ripple WJ, Wolf C, Newsome TM, Barnard P & Moomaw WR (2020) World Scientists' Warning of a Climate Emergency. *BioScience* 70:8-12.

Sharp T & McLeod S (2016) Kangaroo harvesters and the euthanasia of orphaned young-at-foot: Applying the theory of planned behaviour to an animal welfare issue. *Animal Welfare* 25:39-54.

Steffen W et al. (2009) [Australia's biodiversity and climate change - a strategic assessment of the vulnerability of Australia's biodiversity to climate change](#). A report to the Natural Resource Management Ministerial Council commissioned by the Australian Government. CSIRO Publishing.

Attachment 1: Relevant RSPCA Policies

RSPCA Policy E01 Wildlife - General principles

1.1	RSPCA Australia recognises that the state of an ecosystem directly affects the diversity of populations, the likely survival of species and the welfare of individual animals within it. Consideration of wild animal welfare thus requires finding a balance between maintaining the viability of an ecosystem and protecting the welfare of individual animals.
1.2	RSPCA Australia believes that wherever human activities have the potential to have a negative impact on wild animals, whether directly or indirectly, we have a duty to ensure that they are conducted in a way that causes as little injury, suffering or distress to animals as possible.
1.3	RSPCA Australia supports the use of independent environmental impact assessments to determine the potential of any development to threaten the continued survival of a species, significantly alter existing ecosystems, or have a negative impact on animal welfare. Where development projects identify threats to the welfare of wild animals, conditions must be placed on the development to mitigate these threats. Where mitigation is not possible or reasonable the development should not go ahead.
1.4	RSPCA Australia believes that management practices utilising natural resources (such as mining and logging) must be designed to ensure that they cause as little suffering to animals or negative consequences for the viability of a given population as possible.
1.5	RSPCA Australia supports the establishment and maintenance of national parks and conservation zones in areas of environmental significance to preserve genetic diversity, promote biodiversity and protect native animals from human impacts. The use of such areas should only permit activities that do not compromise animal welfare. At the same time, RSPCA Australia recognises that these areas alone are not sufficient for the conservation of biodiversity.
1.6	RSPCA Australia supports the ratification by the Australian government of international treaties, conventions and agreements which serve to protect biodiversity and promote the humane treatment of wild animals.

RSPCA Policy E02 Management of wild animals

- 2.1 RSPCA Australia acknowledges that in some circumstances it is necessary to manage populations of wild animals, native or introduced. There are three main reasons used to justify the management of wild animals:
- to protect the welfare of individual animals
 - to help conserve a threatened, endangered or vulnerable native species
 - to reduce adverse impacts on human activities or the environment.
- It is noted that in most cases these problems have arisen as a result of human activities or interventions.

2.2	Any measures taken to manage wild animals must recognise that whether an animal is native, introduced or viewed as a 'pest' does not affect its capacity to experience pain, suffering or distress.
2.3	Programs and strategies which prescribe the management of wild animals (such as threat abatement plans and native animal management plans) must be justified, supported by scientific evidence and have clearly stated aims. Such programs should be subject to public consultation, ethical approval and review prior to implementation. Once implemented, the results of such programs should be regularly monitored, evaluated, publicly reported and used to inform future activities.
2.4	Management activities (such as on-ground intervention or control) should only be undertaken if it is likely that the aims of the program can be achieved. The methods used must be humane, target-specific and effective (see E2.10).
2.5	Once the aims of a management program have been achieved, steps must be taken to ensure that the outcomes are maintained in the long-term.
2.6	RSPCA Australia advocates the adoption and implementation of compulsory codes of practice and standard operating procedures for all wild animal management activities. See www.pestsmart.org.au/animal-welfare/humane-codes
2.7	Protecting the welfare of wild animals
2.7.1	Management programs aimed at protecting the welfare of individual animals or populations may be necessary where populations are subjected to severe environmental stress, habitat fragmentation, disease or human activity. Such programs must only be carried out under the supervision of the relevant government agency.
2.7.2	In some circumstances it is considered necessary to reduce the size of a given population of wild animals for the long-term benefit of that population. The killing of animals for this reason should only be permitted where it can be carried out humanely and there is no non-lethal, humane and effective alternative available (see E2.10). See also E3 Rescue and rehabilitation of wild animals
2.8	Conserving native species
2.8.1	Management programs aimed at conserving native animals, including threatened, endangered or vulnerable species centre on habitat protection, but include strategies such as captive breeding, translocation and release of animals. Care must be taken to minimise any adverse effects of these activities on the welfare of both target and non-target animals. Such programs must only be carried out under the supervision of the relevant government agency.
2.9	Reducing adverse impacts of wild animals
2.9.1	Many introduced animals, and some native animals, are viewed as 'pests' because of their adverse impacts on human activities, health and wellbeing or the environment. These adverse impacts include:

	<ul style="list-style-type: none"> ○ land degradation, ecosystem effects, and predation and competition with native species ○ losses to agricultural, horticultural and forestry production, including grazing competition, damage to crops, predation on domestic animals and damage to infrastructure ○ risks to public health and safety ○ other human activities such as tourism, recreation and transport. <p>RSPCA Australia acknowledges that, in certain circumstances, it is necessary to manage populations of wild animals in order to reduce these impacts.</p>
2.9.2	Management programs must be aimed at reducing adverse impacts rather than simply reducing the number of animals. RSPCA Australia is opposed to the use of incentive methods (such as bounty systems) where these focus on killing animals rather than reducing impacts.
2.9.3	Wherever possible, pest control measures should be carried out as part of an integrated pest animal management program in consultation with the relevant government agency. Lethal methods must only be used where there is no non-lethal, humane alternative available that is effective at achieving the program's aims.
2.10	Management and control methods
2.10.1	RSPCA Australia is opposed to the use of inhumane methods of controlling or managing wild animals. A totally humane method is one which does not cause any pain, suffering or distress to target and non-target animals. See also Policy G1 Humane killing
2.10.2	When determining the method of control, the most humane method that will effectively achieve the aims of the management program must be used.
2.10.3	The humaneness of a given control method is influenced by its application and the skill of the operator. Control methods must be applied in the best possible way by trained and competent operators.
2.10.4	RSPCA Australia supports the independent assessment of the relative humaneness of control methods and the publication of these assessments to assist in identifying the most humane available methods for a given situation. See Sharp T and Saunders G (2011). A model for assessing the relative humaneness of pest animal control methods . Australian Government Department of Agriculture, Fisheries and Forestry, Canberra, ACT
2.10.5	RSPCA Australia believes there is a continuing need to improve current control methods or replace them with more humane and effective alternatives. The RSPCA supports research and development of humane alternatives, including the replacement of lethal methods with humane and effective non-lethal methods, such as reproductive control.

Attachment 2: Summary of key issues to be addressed in a revision of the National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Non-Commercial Purposes

1. Inclusion of shooter responsibility and competency information

The RSPCA strongly advocates that the first section in the revised Non-commercial Code focus on shooter responsibilities and competency and that the mandatory requirements contained in the 2020 Commercial Code are adopted for non-commercial shooters as a matter of urgency. Operator competency is one of the most important factors influencing welfare outcomes. It is essential that all shooters demonstrate competency.

The first section in the 2020 Commercial Code contains the following mandatory requirements for harvesters;

- 1.1 A person conducting commercial harvesting must exercise a duty of care to ensure that kangaroos and wallabies are harvested humanely and they understand and comply with the requirements of this Code.*
- 1.2 Harvesters must be competent to perform their required tasks and can be supervised by a competent person.*
- 1.3 Harvesters must pass a recognised (or approved) shooting accuracy test at least every 5 years.*
- 1.4 Harvesters and test supervisors (assessors) must adhere to the minimum test conditions and requirements as specified in Appendix 1: Assessment requirements for shooting accuracy testing (or as specifically required by state or territory jurisdictions), for the shooting accuracy assessment to be valid.*

2. Need for standard operating procedures

The Non-commercial Code does not provide enough detailed information for harvesters to perform specific procedures – especially for effective and humane killing of dependent young. A prescriptive standard operating procedure (SOP)–presented either as a separate guideline or as an appendix to the Code – that describes in detail how to euthanase young and also the procedures for shooting of adults and euthanasia of wounded animals, would help to minimise some of the most severe animal welfare impacts associated with shooting kangaroos.

The revised 2020 Commercial Code now contains three SOPs, one for humane shooting of adults and two for humane killing of dependent young (one for pouch young and one for young at foot). The RSPCA advocates that these SOPs be included in a revised edition of the Non-commercial Code.

3. Inadequately defined methods, vague terminology, or inaccurate statements that could result in poorer animal welfare outcomes

The Non-commercial Code does not adequately describe or define specific terms and phrases that are crucial for shooters to understand how to apply humane killing methods.

For example:

- a) With the killing of pouch young, the Code states that a ‘single forceful blow to the base of the skull sufficient to destroy the functional capacity of the brain’ should be used. McLeod and Sharp (2014) reported that various methods are used to kill pouch young using blunt trauma, i.e., hitting against the utility tray or rack, with rocks, the foot or a

metal bar. Based on their evaluation, some approaches are more effective and humane than others. The 2020 Commercial Code now includes a SOP for humanely killing dependent young using blunt trauma. It should also be noted that based on new evidence, applying the force to the base of the skull is not the recommended location. To achieve instantaneous insensibility a blow to the dome of the skull is preferred.

- b) On page 6 of the Non-commercial Code the term ‘corneal reflex’ is used when discussing confirmation of death of killed young. This term has not been defined and many shooters may not know what it means or how to check for it. Furthermore, it is difficult to determine death in small, unfurred young that have fused eyes, thus, in these animals we argue that shooters should be ensuring death by using a secondary humane killing method rather than trying to confirm death.
- c) The Non-commercial Code also refers to the term ‘reasonable effort’. We argue that this is too vague and more specific guidance should be provided. For example, in section ‘2.4 Shooting procedures’, the Non-commercial Code states that ‘...no further animals can be shot until all reasonable efforts have been made to locate and kill the injured animal’. How long is reasonable? It could be interpreted as possibly one minute, 5 minutes, or an hour for example. We understand that this cannot be overly prescriptive, but a timeframe (e.g., no less than 15 mins) would provide better guidance than just ‘reasonable effort’.

4. Background information including humaneness principles

The Non-commercial Code should include an appropriate level of background information on kangaroo biology and ecology. It should also address principles of animal welfare and humaneness so that shooters can appreciate why it is important to reduce animal suffering and are made aware of the philosophical differences between animal rights and animal welfare; humane killing and euthanasia.

5. Humane killing of dependent young-at-foot

The Non-commercial Code needs to include detailed information to explain why the euthanasia of orphaned dependent young-at-foot is important. If this is not done, the young-at-foot will suffer poor welfare. McLeod and Sharp (2014) concluded that the mental state of young-at-foot is highly affected by an abrupt and permanent separation from maternal care. We also now know that shooters do not always humanely kill dependent young-at-foot even when it is possible for them to do so, thus it is important to reinforce the reasons why humane killing should be performed. The Non-commercial Code should provide guidance on what stage of development young-at-foot are still nutritionally dependent and may not survive if orphaned, along with how to locate and identify these animals.

The current Non-commercial Code states in section ‘2.4 Shooting procedures’ that young-at-foot are shot to avoid ‘dispersal’ but the reason should be to avoid ‘animal suffering’.

6. Point of aim diagrams

The point of aim diagrams in Schedule 2 of the current Non-commercial Code are not adequate and should be updated. They should include more detail, including underlying brain structures for the headshots and skeletal structure for the chest shots, specific areas that must be targeted, and trajectories for a range of different shot angles. The 2020

Commercial Code contains updated diagrams which should be included in the revision of the Non-commercial Code.

7. Competency tests for shooters

The competency tests for shooters should be the same as for commercial harvesters and need to be standardised across the states. There is no valid justification for having different competency requirements depending on state or territory.

SUBMISSION END