

**Submission
No 359**

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

Name: Mr Philip Machin

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Submission into the inquiry into the health and wellbeing of kangaroos and other macropods in New South Wales

Introduction

Thank you for the opportunity to contribute to the discussion into the wellbeing of macropods and particularly kangaroos.

In preparing this submission, I feel it is important the committee is reminded that kangaroos (and many other targeted wildlife) are sentient animals – that is kangaroos are able to experience feelings, such as stress, happiness, joy, gratitude and pain. Killing off a mother will affect its dependent young and the mob as a whole. Typically, kangaroos are seen by landowners, farmers – and politicians, as ‘pests’ that can be slaughtered without consideration for their wellbeing and that of their family. Over time, rather than make room for kangaroos in the landscape, governments have adopted an annihilation approach to appease developers, farmers and landowners. Perhaps this approach should change to ensure kangaroos don’t go the way of so many once abundant species, and become endangered.

I have written to a number of NSW Premiers, Ministers and relevant government departments over the last 10 years about many of the issues listed in the Terms of Reference (TORs) and have been unable to obtain definitive answers relating to the management of NSW kangaroos. I hope that the Committee is inquisitive and ensure the Department of Industry & Environment – Wildlife (DPI&E), and the National Parks and Wildlife (NPWS) authorities can fully justify extant policies and procedures pertaining to the humane treatment and the ongoing necessity to cull kangaroos. The Department needs to provide evidence that sentient animals, in the numbers estimated, are being treated humanely and not simply slaughtered in the most despicable manner in the name of progress.

Contrary to the Department’s (DPI&E and NPWS) reassurance, that “all is well”, clearly the TORs for this committee suggest otherwise.

Estimating population size

Each year, DPI&E publishes a Quota Report. These reports provide impressive estimates of the kangaroo population across NSW regions and quota are established for the commercial kangaroo harvest ‘industry’. Animals are counted by means of line transect surveys using a light fixed wing aircraft and ‘trained observers’. Mathematical modelling is then applied to estimate the density of kangaroos in a region. Only parts of NSW are surveyed from one year

to the next and I suspect no surveys are undertaken where it is known kangaroos have largely been eradicated.

This estimation method is inherently inaccurate, which is partly acknowledged in the Reports. As an experienced ex-military pilot, I can attest to one's ability to accurately count small objects on the ground, as one flies by at speed and at 500 ft. The inaccuracy of this estimation method can be considerable. Years ago, I noticed that the underlying modelling changed from one year to next, however when I inquired about the rationale of the modelling, I was ignored. This led me to believe there is a degree of 'creative maths' taking place to make the numbers 'fit' expectations.

Except for additional special quota, commercial 'take' is limited to 15% of an estimated kangaroo population. However, it appears the practical way that animal numbers are identified is when a commercial shooter can no longer find animals to kill. NPWS then acts and prevents further culling in that region.

What is missing from the annual Quota Reports is an acknowledgement as to where the animals have largely been eradicated, or areas where the land does not support kangaroos. After 220 years of European settlement, with the ensuing town and farm development, and continuous culling – particularly to the east of the Great Dividing Range, kangaroo is no longer abundant and has largely been eradicated in many areas. It would be useful for the government and community to be made aware of these areas to ensure whatever animals are left may be protected. The eradication of kangaroo in areas where they were abundant is an indication of the likely impact of wanton culling across the State.

Development across NSW continues unabated and it is not surprising the culling focus is centred in the mid-western and western plains and semi-arid regions further out. As more and more laser-levelled, irrigated, farmland is opened up and farmers continue to try to farm in marginal areas, will we see, overtime, an eradication of kangaroos in those areas too? Clearly a balance needs to be established between 100% support to farmers who want to kill of a perceived pest and the need to protect the kangaroo species, across the NSW landscape, for all time. Establishing more national parks may be an option, but these need to be connected.

Perhaps the Committee:

- *can discover the veracity of the mathematical modelling used to set quota numbers from one year to the next;*
- *ensure that Quota Reports identify regions where there are no longer substantial kangaroo populations;*
- *and review the current government's planning and culling philosophy, which appears to be on track to kill off the majority of kangaroo over the coming decades.*

Threats to kangaroos

Many government officials and pro-cull academics are quick to say kangaroos no longer have a natural predator and populate exponentially when times are good. This is a self-serving argument. In reality there are many natural and human threats.

Dingos are still prevalent in many areas, as are a growing number of wild dogs. Often forgotten is the damage done by the lowly fox. Foxes readily prey on isolated joeys-at-heel

(up to 18 months) and joeys just leaving the pouch. Having lived in a rural area for 20 years, I can attest to the impact of foxes, wild and uncontrolled dogs on kangaroos – often a mob is startled, dependent young become separated and become ready prey, or simply die from starvation later.

The biggest threat to kangaroos is humankind. Farmers complain kangaroos eat all the “green stuff”, but this is an erroneous argument in order to kill off these animals. Dry Sheep Equivalent (DSE) can be used to compare grazing pressure of stock and other animals. There are many variables, but an adult kangaroo may eat as little as 0.3 DSE. Cattle and horses have a DSE of about 12. A lactating cow DSE is about 22. Kangaroos are light footed, do not damage the land and are not constrained. Hoofed stock animals eat down to dirt and trample the land. Observe a typical mob of 30 to 50 kangaroos in a paddock and it is equivalent to one or two large heifers or horses. Exclusion fencing can be used, but if the government wishes to conserve native wildlife for future generations a better balance is needed rather than slow eradication.

As well as traditional government policies for commercial and non-commercial culling, undertaken by qualified and licenced shooters, in 2018 these rules were relaxed to permit any property owner with a valid firearms licence to kill off animals. Certainly, an application to cull is still required, however the 2018 scheme overtly encourages totally amateur shooters to join property owner and help out with a cull. Indeed, the use of inexperienced volunteers is encouraged by Local Land Services who maintain a register of volunteers. Unlike commercial harvesters and other licenced shooters, such as licenced wildlife group volunteers and the RSPCA, farmers and amateur shooters do not have to undertake mandatory animal welfare training to ensure animals are killed humanely. As far as I am aware the 2018 government policy change is still extant.

NSW government’s draconian kangaroo management policies and regulations pose a major threat to the survival of the species. Too many animals are being killed off. So many areas in the more developed areas of NSW have been stripped of its kangaroo population. Government permission to kill off large numbers of animals to pander to ongoing town development, mining and farming expansion is taking its toll. There is a very real risk kangaroos will go the way of the koala population if the government does not take a more modest approach.

The Committee may wish to note:

- *that kangaroo populations cannot increase exponentially and the accepted quota system may be inappropriate in the 21st Century;*
- *that modern-day threats exist including from dingo, wild dogs, foxes and irresponsible untrained landowners and casual shooters;*
- *a better balance is needed between conserving native wildlife and the needs of landowners;*
- *there is a need to rescind the 2018 government policy, which allows untrained landowners and amateur shooters to kill off animals; and*
- *there is a need to carry out an independent review of the current NSW government kangaroo management policies to ensure kangaroos remain a common species across the landscape.*

Government policies and programs

When it comes to kangaroo population expansion from one year to the next, there is a considerable myth promoted by pro-cull academics, farmers and town planners about its ability to procreate exponentially. The Committee can do the sums. Assuming a mob of 100 animals; allow for barren young and old, male and female; there may only be perhaps 30 female kangaroos carrying pouched young in any one year. Of these not all joeys will survive due to disease, deformity and predation. Allowing for animals dying from old age, one can see that population growth is modest. A kangaroo can only hold one joey in its pouch at a time. Killing off too many kangaroos, as is currently occurring, will simply see the gradual eradication of a population. This is why it is so important for NPWS to actively investigate a property owner's application to cull claims before issuing a licence.

Climate change is upon us – something which is barely acknowledged (minor reference only) in the NSW government Commercial Kangaroo Harvest Management Plan 2017-21. Prolonged droughts, extraordinary bushfires, such as those experienced in 2019/20, and widescale flooding, take their toll and yet, except for a cursory comment about bushfire in the latest Quota Report, these events have not been considered when establishing a safe level culling quota. Land clearing for town development, mining and farming are increasingly impacting on the numbers of kangaroo remaining. The government's Quota Reports do not take into account the quantum of habitat loss. If we want kangaroos to be present in the NSW into the future, then the government needs to consider how climate change will impact our kangaroo management.

Many property owners exaggerate the number of kangaroos. Some will see hundreds, or thousands, of animals when there are only tens and hundreds. Given the demise of NPWS due to government cuts, over time, the issue of culling licences, has become a desk-top exercise, done by email and telephone. NPWS simply doesn't have the capability to check the veracity of a property owner's claims and rarely, if ever, checks animals have been despatched in the number agreed and in a humane manner. I hope the Committee can see how fraught this situation is. Without pro-actively checking the situation on the ground, it is impossible to deduce the veracity of a property owner's claims. Likewise, regardless of the number of tags issued (which are no longer required for non-commercial culling), without NPWS active policing, there is no idea how many animals are actually being slaughtered and despatched in a humane manner. NPWS does not have the resources to actively manage the government's state wide culling program. The program is simply not policed.

The National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes (and a separate publication for non-commercial shooters) establishes the criteria for the humane culling of animals. A shooter has a duty of care to "minimise(s) pain, suffering and distress". Importantly, the Code states that dependent young and adult animals only wounded, but not killed, are to be tracked and fully euthanised before continuing with the cull. Animals shot must be confirmed dead. The committee might ponder on how this is applied at the dead of night with limited visibility and in an isolated area. Young at-heel joeys are too small to target and too quick for a shooter to handle – they will escape unless they remain with its dead mother. Escaped dependent young will not survive and be subject to starvation or predation. Similarly, it is unlikely a commercial shooter will stop and check each animal shot before targeting the next one, especially if the animal is wounded and remains mobile. As a licenced wildlife rescuer and shooter, I can attest to instances whereby adult kangaroos have remained alive for days with half a jaw missing or a maggot-infested bullet

wound in the shoulder. Clearly these animals were not tracked and properly euthanised. The only way the Code can be maintained is if the process, and act of culling, is policed in the field. However, except for the occasional check of dead animals in a harvester's cold room, there is currently no quality assurance taking place whatsoever. None.

The NSW licencing application process has no worthwhile quality control from a landowner's claims of economic or property damage; or the number of animals present; or the manner of humane despatch; and then ensuring only the agreed number of animals are killed. In areas where farming is not economically viable, why does the government issue licences to kill of the remaining wildlife?

The committee may wish to note:

- *given the onset of climate change, there is a need for the NSW government to review kangaroo management policies and reassess the way in which kangaroos are 'managed' into the future to ensure they remain a common part of our landscape;*
- *that all shooters who wish to shoot kangaroos must complete an approved Firearms Safety Brief and accuracy test;*
- *acknowledge that DPI&E and NPWS lack the resources to adequately police the government's licencing and culling process;*
- *recommend to government that the NSW government's 2018 policy, which permits city-based amateur volunteer shooters to sign up to kill kangaroo, must be rescinded;*
- *markedly improve NPWS resources to permit the active policing of the NSW government kangaroo management policing the field; and*
- *stop issuing cull licences to farmers and landowners who are farming in areas that are simply not viable.*

Impact on pouch and at-heel joeys

It is not known how many in-pouch and at-heel joeys are killed, as part of the NSW government kangaroo management, as nobody is counting, or checking. There is currently no effective quality control of the process in place and the NSW government appears to be content with this situation. NPWS does not police in-field culling activities and turns a blind to what is occurring.

When it comes to euthanising pouched young, incredibly, the Code suggests, "are not capable of experiencing pain". Recommended euthanasia methods include, decapitation and cervical dislocation – both of which will induce stress and pain. Furred and partially furred pouched young can be simply bashed on the head causing "blunt force trauma". The Code also permits, "hold the young firmly by the hindquarters (around the top of the back legs and base of tail) and then swing firmly and quickly in an arc so that the rear of the joey's head is hit against a large solid surface that will not move or compress during the impact (e.g. the tray of a utility vehicle)".

At-heel joeys may also be killed by a concussive blow to the head, if they can be caught (which is unlikely), or shot. At-heel dependent young are extremely difficult to target, as they are small and quick. Invariably they will escape to die of starvation or by predation.

The committee may well have seen TV video footage of harvesters swinging young animals by its legs and bash them against the side of a 4WD vehicle. The committee might ponder as

to how this would not cause extraordinary stress to the animal and an uncertain death (not all animals will die by this process)

Perhaps the answer is not to target female kangaroos in the first place. And clearly it is important for the whole activity of culling kangaroos be actively policed to ensure licenced shooters are indeed euthanising animals humanely.

The committee might:

- *note the abhorrent nature of current euthanasia practices and review more humane methods for the treatment of younger animals;*
- *recommend to government that female kangaroos must not be targeted, as part of the government's kangaroo management program; and*
- *recommend that NPWS resources be markedly increased to enable the policing of in-field activities to ensure all animals are euthanised humanely.*

Compliance

Government regulations and Codes of Practice for commercial and non-commercial culling are in place. However, except for a minimal amount of inspection of a harvester's cold room, there is no quality assurance taking place in the field. Unless a complaint is received from a member of the public, it's impossible to know whether the thousands of NSW kangaroos killed each year have been despatched humanely or not.

The NSW government has chosen to turn a blind eye to animal welfare aspects of the culling process by ensuring NPWS does not have the capacity to act by cutting the organisation's staffing levels. Given the size of NSW (four times bigger than the UK) and limited NPWS resources, there is no hope to ensure animals are being killed humanely, and in the numbers allowed. One suspects a large minority, perhaps a majority, of animals culled, die horribly. The only way to ensure animals are being dealt with humanely, and to monitor the professionalism of a shooter, is to mandate animal welfare training and fully police the regulations and Codes of Practice – in the field.

The committee might note:

- *it is not possible to know how many kangaroos are being killed;*
- *that, under the current regime, it is not possible to ensure compliance with the kangaroo management regulations and the associated Codes of Practice;*
- *that the capacity of the NPWS needs to be markedly increased to adequately police the culling of animals.*

Keeping track of numbers killed

Th NSW government no longer issues tags for a non-commercial licences to harm kangaroos. The Department puts faith in the landowner being entirely honest when assessing damage done to their property; numbers of kangaroo present; and number to be killed off. The veracity of landowner's claims is not checked and any number of animals can be slaughtered.

Commercial harvesters do need to apply for tags and have a landowner's permission to cull (normally requested by the property owner). Culling is monitored by NPWS – from behind a desk, to ensure quotas are not exceeded for that particular region.

The NSW kangaroo management plan, with its (in)accurately determined population estimates and regional quota is flying blind. Any number of animals may be killed off by harvesters and landowners – out of sight and out of mind. The Department may feel they have done a good job and the system is robust, but with and pro-active compliance policing, it means very little. As mentioned previously, the first time NPWS will be aware that something is wrong is when a harvester reports the lack of animals to target.

The committee might:

- *agree that, under the current regime, it is not possible to know how many animals are actually being killed and how many remain; and*
- *recommend to the NSW government that NPWS resources need to markedly increase in order to police its kangaroo management policies and plans.*

Alternate measures

The Terms of Reference wishes to investigate, “measures to provide an incentive for and accelerate public and private conservation of kangaroos and other macropods.” This is an interestingly prospect. On the one hand native animals are ‘protected’ by the Biodiversity Conservation Act 2016, and on the other hand the 2021 Quota Report intends to cull over 1.5M animals.

As previously mentioned, in large areas of NSW kangaroo has been eradicated by continuous culling over the last two centuries. And with ever larger laser-levelled, modern, irrigated farms to the west, as well as the government support being given to marginal farming in semi-arid and arid areas of NSW, it seems macropods have an uncertain future.

It seems a futile activity to provide incentives to accelerate public and private conservation of kangaroos and other macropods when the government treats them as a pest to be exterminated out of hand.

Licensed wildlife groups and zoos help to conserve the kangaroo species, but are poorly supported by government. Indeed, whether it be under resourcing of NPWS, or overly regulating volunteered manned wildlife groups, it is clear DPI&E, on behalf of the government, is doing a good job in preventing conservation taking place.

Conservation measures could be put in place to reduce red tape and provide ongoing financial support to licensed wildlife groups and zoos to undertake conservation. An option for government might be to give incentives to farmers and private landowners to protect native wildlife in the same way as incentives are given to plant trees.

However, what is the point of conservation when so many animals are ‘legally’ killed off anyway in pursuit of 21st Century ‘progress’.

The committee might note:

- *the government's insincerity to 'protect' native animals, but at the same time readily kill off thousands of animals each year;*
- *conservation is important, particularly in areas where the species have been largely eradicated, but red tape and resourcing of volunteer wildlife organisations need to be addressed; and*
- *Conservation measures might include incentives for farmers and private landowners.*

It would be disappointing if our generation failed to handover a better world to those that come after us. Don't you agree?

Yours sincerely

Philip Machin