

Submission
No 401

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

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THE NSW LEGISLATIVE COUNCIL'S PORTFOLIO COMMITTEE NO. 7 – PLANNING AND ENVIRONMENT INQUIRY INTO THE HEALTH AND WELLBEING OF KANGAROOS AND OTHER MACROPODS IN NEW SOUTH WALES.

INTRODUCTION

Thank you for the opportunity to provide a submission to this crucial inquiry into the health and wellbeing of kangaroos and other macropods.

Collective Fashion Justice is a non-profit dedicated to creating a total ethics fashion system that values the life and wellbeing of all animals; human and non-human, as well as the planet. The slaughter of native wildlife for fashion, considered to be the ‘backbone’¹ of the harvest industry by the government, is deplorable and unacceptable to Collective Fashion Justice.

Collective Fashion Justice is very concerned about the health and wellbeing of kangaroos and other macropods due to mounting threats of climate change, catastrophic bushfires, habitat destruction and slaughter for commercial harvesting and culling. Tens of millions of kangaroos have been killed for harvesting², with kangaroo killing being the largest on land commercial slaughtering of wildlife globally³. These numbers do not include the millions of orphaned joeys who have been decapitated, beaten to death, or left to slowly perish⁴.

The relevant codes and regulations permit cruelty and the absence of monitoring of slaughter reveals that compliance with even the most trivial of nominal welfare standards cannot be guaranteed. Further, the methods used to calculate population numbers and harvest quotas are questionable, and the commercial drive behind quotas is troubling due to conflicts of interest overriding wellbeing in an already dire context for kangaroos and other macropods.

There is increasing international scrutiny and changes in mindset as to the use of kangaroo parts within the footwear and apparel industries, with the recent US Bill⁵ a possible portent of further action in major export markets like the US and Europe. Prominent NGOs such as Eurogroup for Animals and the Centre for a Humane Economy have been campaigning to raise awareness about the plight of kangaroos and other macropods, and efforts will only increase in tandem with growing public awareness.

Lastly, Collective Fashion Justice urges the government to recognise the ‘pest’ label given to kangaroos and other macropods as false, given that these native animals have existed on this land for over 200 million years⁶, and have lived harmoniously with the land during that time.

¹ <https://web.archive.org/web/20210309004812/https://environment.gov.au/node/16678>

² [Kangaroo and Wallaby Statistics Archive; Macropod quotas and harvest statistics for NSW, QLD, SA and WA commercial harvest areas](#)

³ [WELFARE IMPLICATIONS OF COMMERCIAL KANGAROO HARVESTING: DO THE ENDS JUSTIFY THE MEANS](#)

⁴ [Shooting of kangaroos causes animal suffering - KANGAROOS AT RISK.](#)

⁵ [Titles - HR917 - 117th Congress \(2021-2022\): Kangaroo Protection Act of 2021 | Congress.gov | Library of Congress](#)

⁶ [Australia has been home to hopping kangaroos for 20 million years](#)

TERMS OF REFERENCE

1 (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,

(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,

Australia has an unfortunate history of being one of the worst countries when it comes to rates of animal extinctions⁷, with current research showing continuing declines in wild animal populations⁸. Concern for kangaroos and other macropods, and wellbeing of populations, prompted this critical Inquiry⁹. And there is evidence that the sustainability of the *New South Wales Commercial Kangaroo Harvest Management Plan 2017–2021* demands scrutiny. Particularly as the methodologies used to arrive at estimations for kangaroo populations are problematic and there is a lack of transparency as to how estimates are calculated.

Numbers of kangaroos and other macropods are obtained by manual aerial counting, involving flying over one of the 16 management zones and counting kangaroos observed per defined area. These counts are then extrapolated to the total area of the particular zone¹⁰ but there is no available information as to how calculations are made and whether surveys are even standardised across zones or states. Further, factors such as square kilometres of each zone which contain towns, industrial areas (which have no kangaroos), and farms where ongoing culling has already reduced populations do not appear to be taken into account. Nor is the slow reproductive capacity of kangaroos and the high infant mortality rate.

The methodologies used are not scientifically robust, resulting in over-inflated estimates. For instance, modern best practice for counting wild animal populations includes remotely piloted aircraft also known as Unmanned Aerial Vehicles (UAVs), applying semi-automatic counting, motion-sensor camera imaging and the use of AI which provides much more accurate estimates. There are other jurisdictions Australia could look to for guidance which face similar challenges in relation to counting populations over vast land areas.

Evidence that the *New South Wales Commercial Kangaroo Harvest Management Plan 2017–2021* is unsustainable is that the population increases contradict what is biologically possible under ideal conditions, let alone during droughts or extreme bushfire seasons. Quota reports continually show increases well above 10% each year in the various zones¹¹.

This in turn undermines the asserted means by which the health of populations is assessed i.e., monthly average weight of killed animals and population numbers, given that there are credible concerns around how population numbers are estimated in the first place.

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

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

Threats to the habit of kangaroos and other macropods are not sufficiently addressed. Climate change, which exacerbates a continent already prone to drought and bushfires, has devastating impacts on kangaroos and other macropods' habitats and inturn on populations.

⁷ [OECD Australia Chapter 4](#)

⁸ Ibid.

⁹ [Kangaroo wellbeing to be subject of NSW upper house inquiry](#)

¹⁰ [2020 Quota Report New South Wales Commercial Kangaroo Harvest Management Plan 2017-21.](#)

¹¹ Ibid.

Despite claims of over-abundance, kangaroos breed very slowly, producing about 1 young per year¹², and breeding is reduced or even ceases when food supply is inadequate¹³. Kangaroos do not reach sexual maturity until they are about a year old or several years old depending on species and sex, and environmental conditions can significantly delay maturity¹⁴.

(ii) bushfires

After the catastrophic bushfires of 2019/2020, it is extremely concerning that no moratorium was placed on killing wild animals and that kangaroo killing continued. The bushfires brought focused global attention on Australia and the loss of wildlife.

Almost three billion vulnerable wild animals were impacted¹⁵, most of whom likely perished and the aftershock of the fires afflicted animals for months due to starvation, lack of shelter and predation¹⁶. NSW and Victoria were particularly impacted with around 12.6 million hectares burning¹⁷. This detrimental impact continues due to extensive habitat loss, and the scale of the devastation will not be known for years to come, with predictions that it will take years for animal populations and habitats to recover, with some unlikely to recover¹⁸.

This threat to kangaroos and other macropods will only grow as future forecasts indicate that bushfires will continue to escalate and increase in duration¹⁹.

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

Whether for agriculture, urban development or mining, human activity has taken over most of the land in Australia – land that was once habitat for numerous native animals²⁰, including kangaroos and other macropods. Concerningly, clearing of land continues to be one of the greatest threats to wild animals²¹ due the destruction of habitat and the animals killed. Land clearing also exacerbates both climate change and bushfires²² - and one of the primary reasons behind clearing of land is to create pasture for farmed animals²³.

In addition, the effect of injury and death caused by vehicle collision due to urbanisation causes significant detrimental impacts on kangaroo populations²⁴ and requires further investigation.

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

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

Quotas are set based on estimates of populations of kangaroos and other macropods in the kangaroo management zones in NSW. There are two main problems with how population estimates are calculated.

¹² [Kangaroos, Terence J Dawson, 9780643106260; It's raining kangaroos: the ups and downs of kangaroo management](#)

¹³ [Kangaroos, Terence J Dawson, 9780643106260; Lifetime reproductive success in a population of female red kangaroos *Macropus rufus* in the sheep rangelands of western New South Wales: Environmental effects and population dynamics](#)

¹⁴ G. W. Arnold et al, Population Ecology of Western Grey Kangaroos in a Remnant of Wandoo Woodland at Baker's Hill, Southern Western Australia 1991; [Kangaroos, Terence J Dawson, 9780643106260](#)

¹⁵ [Australia's 2019-2020 Bushfires: The Wildlife Toll - WWF-Australia](#)

¹⁶ [Impact of Australia's catastrophic 2019/20 bushfire season on communities and environment. Retrospective analysis and current trends](#)

¹⁷ [After the Megafires: What Next for Australian Wildlife?](#)

¹⁸ Ibid.

¹⁹ [Climate Council The facts about bushfires and climate change](#)

²⁰ [Land use in Australia at a glance \(agriculture.gov.au\)](#)

²¹ [OECD Australia Chapter 4](#)

²² [A continent under stress: interactions, feedbacks and risks associated with impact of modified land cover on Australia](#)

²³ [Living Planet Report 2018](#)

²⁴ [Spatial ecology of an urban eastern grey kangaroo \(*Macropus giganteus*\) population: Local decline driven by kangaroo-vehicle collisions](#)

The first issue is that population counts are conducted by manual aerial counts even though there are modern methods available which provide greater accuracy, predominately the use of UAVs and the use of AI. Further, there is no accessible information as to whether areas devoid of kangaroos are included in calculations, for instance towns, industrial areas, and so on. Other important factors that appear unaccounted for in calculations are drought, bushfires and high infant mortality rate within kangaroo and other macropod populations.

An indication that there are problems with estimates, is that they contradict the biological capacity of kangaroo reproduction in ideal conditions. Kangaroos and other macropods breed very slowly, and even in ideal conditions, the population increase is approximately 10%²⁵ but quotas are regularly set at 15-20% of the population. One possible reason that we are not seeing greater declines is because only a small portion of the quotas have been harvested in the last few years²⁶.

(ii) the management of licences to cull kangaroos,

Even prior to the weakening of licence conditions, it was relatively easy to obtain a license to harm, i.e. kill, protected native animals who were claimed to be a threat to human safety, damaging property and/or causing economic hardship²⁷. But there is no criteria for what constitutes 'threat' or damage to property and no requirement to provide any proof.

Licences are obtained simply by filling out an online form and lodging it with the local National Parks and Wildlife Service (NPWS) office. And since there is little to no oversight, breaches of license conditions and the *Biodiversity Conservation Act 2016* (NSW) are largely unmonitored. Only a record sheet is provided as part of the licence, which holders must fill in and provide to the local NPWS office²⁸.

Changes were made to licence conditions in 2018²⁹, on the basis of drought and the necessity of killing kangaroos who were suffering as a result of the drought. However, the conditions have not been repealed, despite the catastrophic bushfires killing unprecedented numbers of wild animals.

Essentially, the new licence conditions further facilitate obtaining a license and harming animals, with little to no oversight:

- previous and current licence holders can apply for licences over the phone
- more shooters may operate under each licence, and shooter details are provided to the NPWS after culling operations, rather than with the licence application
- removal of the requirement of carcass tags

Concerningly, the 'ecologically sustainable limits' of harvesting are being enforced by relying on shooters' reporting. And since oversight is lacking, it is unknown how many animals are killed, whether animals suffering from drought are actually euthanised and how many protected species are perishing.

(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,

The current government policies essentially sanction cruelty and provide for further gaps in knowledge as to how many animals are being slaughtered.

²⁵ [FactCheck: are kangaroos at risk?; Kangaroo biology & population ecology](#)

²⁶ [2021 Quota Report New South Wales Commercial Kangaroo Harvest Management Plan 2017 2021](#)

²⁷ [Licence to harm native animals | NSW Environment, Energy and Science](#)

²⁸ Ibid.

²⁹ [Licences to harm kangaroos | NSW Environment, Energy and Science](#)

Orphaned at-foot joeys are left to die of starvation, exposure or predation³⁰ - an estimated 800,000 dependent joeys per year perish as a consequence of commercial shooting alone³¹.

A mature female kangaroo will generally have two joeys in her care, aged around a year apart – one in pouch and one at foot³², but only if food sources are readily available. Infant mortality rate of kangaroos is very high, from 50% to over 70%³³ due to starvation and predation³⁴; and even higher due to drought³⁵. On average female kangaroos are only fertile for about 8 years³⁶, and they successfully raise their first young at around 3 years³⁷.

Thus, it is highly concerning that the relevant codes permit the following:

- Decapitation, cervical dislocation and bludgeoning to death of joeys³⁸
- No training for shooting competency within culling³⁹
- No monitoring within culling⁴⁰
- No record keeping for how many young are bludgeoned to death⁴¹

(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,

This is an area of grave concern, as there is virtually no oversight of compliance. Consequently, even the bare minimum standards as set out in the relevant codes or anti-cruelty legislation cannot be assured⁴². Compliance mechanisms in commercial shooting are far from sufficient and there is an absence of compliance mechanisms within culling as there are no shooting or training requirements⁴³. And slaughtering takes place at night and in remote/isolated regions⁴⁴, which can result in bloodbaths as reported by witnesses⁴⁵:

- joeys are often not killed by the first blow⁴⁶.

³⁰ [What happens to joeys when female kangaroos are shot? – RSPCA Knowledgebase](#)

³¹ [The welfare ethics of the commercial killing of free-ranging kangaroos: An evaluation of the benefits and costs of the industry](#)

³² [Kangaroos, Terence J Dawson, 9780643106260](#)

³³ Ibid; G. W. Arnold et al, Population Ecology of Western Grey Kangaroos in a Remnant of Wandoo Woodland at Baker's Hill, Southern Western Australia 1991.

³⁴ [Kangaroos, Terence J Dawson, 9780643106260](#); G. W. Arnold et al, Population Ecology of Western Grey Kangaroos in a Remnant of Wandoo Woodland at Baker's Hill, Southern Western Australia 1991; [Predation by Red Foxes limits recruitment in populations of eastern grey kangaroos](#)

³⁵ N. Shepherd, Condition and recruitment of kangaroos in Kangaroos: their ecology and management in the sheep rangelands of Australia 1987.

³⁶ T. Dawson, Kangaroos: Biology of the Largest Marsupials 2012, based on Table 6.1; [Lifetime reproductive success in a population of female red kangaroos Macropus rufus in the sheep rangelands of western New South Wales: Environmental effects and population dynamics](#)

³⁷ Ibid.

³⁸ <https://www.agrifutures.com.au/wp-content/uploads/2020/11/20-126-digital.pdf> section 3 and appendices 5&10; <http://www.environment.gov.au/biodiversity/wildlife-trade/publications/national-code-practice-humane-shooting-kangaroos-and-wallabies-non-commercial> secs 5-5.1

³⁹ Ibid sec 3.1.

⁴⁰ [What is the difference between non-commercial and commercial kangaroo shooting? – RSPCA Knowledgebase](#)

⁴¹ [WELFARE IMPLICATIONS OF COMMERCIAL KANGAROO HARVESTING: DO THE ENDS JUSTIFY THE MEANS](#)

⁴² [THE ROLE OF INSPECTIONS IN THE COMMERCIAL KANGAROO INDUSTRY](#)

⁴³ [What is the difference between non-commercial and commercial kangaroo shooting? – RSPCA Knowledgebase](#)

⁴⁴ [THE ROLE OF INSPECTIONS IN THE COMMERCIAL KANGAROO INDUSTRY](#)

⁴⁵ [Kangaroos | Voiceless](#)

⁴⁶ <https://www.agrifutures.com.au/wp-content/uploads/publications/13-116.pdf>

- hundreds of thousands of kangaroos are not killed by the first shot⁴⁷.

As a bare minimum, there should be proper monitoring at killing and investigations into illegal shooting to begin to expose the scale of the problem. Ultimately, Collective Fashion Justice urges this killing be ended.

(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 known impacts of commercial and non-commercial killing on kangaroos and other macropods is alarming, for instance the suffering of maimed animals, joey killing and deaths, and issues with killing during drought, which is a regular occurrence, and will only accelerate with a changing climate. But even more concerning, there is a lack of evidence that populations require control and on the long-term impact of these killings on kangaroo populations⁴⁸.

Compounding this is that preceding the removal of the drop tags requirement there was already limited knowledge as to how many kangaroos were being slaughtered by landowners and by illegal shooting. Removing the drop tag requirement will lead to further uncertainty as to how many kangaroos and macropods are perishing, creating greater gaps and further impairing knowledge of population sizes.

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

A good starting measure would be to seriously address the impacts of climate change, bushfires and habitat destruction to further public understanding about the threats kangaroos and other macropods confront. This would also promote the already changing perception of kangaroos as wild iconic animals needing conservation, debunking the outdated and baseless narrative that they are a ‘pest’.

Another important measure would be the establishment of an office for the protection of kangaroos and other macropods, independent of the NSW Department of Planning, Industry and Environment. This would remove the conflict of interest created by the Department regulating the killing of kangaroos and other wild animals, while simultaneously being tasked with protecting wild animals.

A neglected area related to conservation of kangaroos is to investigate the threats faced by both landowners and animals due to trespass by illegal shooters⁴⁹. At present, surveys are being conducted in NSW to begin to determine the scale of trespass perpetrated for illegal shooting⁵⁰.

Additional conservation measures include creating corridors along migratory paths for kangaroos and other macropods to protect them from being killed by vehicles and fencing/exclusion fencing. And to mitigate the threats of fractured habitats due to land clearing.

Lastly, a relevant initiative would be to invest in sustainable regional tourism, providing opportunities for the viewing of kangaroos in their native habitat and/or creating a great kangaroo national park in NSW. Once international tourism resumes, this would also attract overseas travellers, particularly with the focus placed on wildlife protection as a result of the pandemic, coupled with the rising overseas opposition to kangaroo and macropod slaughter.

⁴⁷ [WELFARE IMPLICATIONS OF COMMERCIAL KANGAROO HARVESTING: DO THE ENDS JUSTIFY THE MEANS; Kangaroos At Risk - Welfare.](#)

⁴⁸ <https://kb.rspca.org.au/knowledge-base/is-there-a-need-to-kill-kangaroos-or-wallabies>

⁴⁹ [Illegal hunters are a bigger problem on farms than animal activists – so why aren't we talking about that?](#)

⁵⁰ [NSW Farm Crime Survey 2020 - University of New England](#)

Thank you for the opportunity to contribute to this imperative and timely Inquiry into the health and wellbeing of kangaroos and other macropods. These treasured native animals are afflicted by grave, unjust issues and we must safeguard their existence and reduce the cruelty they wrongly suffer. We hope that this Inquiry serves to further this essential endeavour by further elucidating the issues affecting the health and wellbeing of kangaroos and other macropods, and creating initiatives for their conservation and protection. Kangaroos are neither pests or resources, they are individuals.