

Supplementary
Submission
No 324a

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

Name: Ms Janice Haviland

Date Received: 25 April 2021

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Name: Ms Janice Haviland

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Parliamentary Inquiry to look at the Health and Wellbeing of Kangaroos and other Macropods-Terms of Reference

Hidden cruelty exists in the commercial and non-commercial killing of kangaroos. **Over 1.6 million kangaroos** are killed for commercial purposes across all of Australia, making it the **biggest commercial hunt of native wildlife in the world** sanctioned by our government. Kangaroos and wallabies are macropods and macropods are unique to Australia. Local and regional extinctions have already been observed throughout the country including NSW. WWF "Species Fact Sheet" states, 'Before European settlement there were 53 species of macropods in Australia and six have since become extinct.' Kangaroos, wallabies, pademelons, bettongs and potoroos are macropods and are listed on the NSW website.

Deserving of our attention is the plight of our kangaroos in NSW. Due to the remote locations where the kangaroo shootings take place every night, there is no effective monitoring of animal welfare standards. A single national Code with improved standards needs to be applied to non-commercial shooting as well. Currently, people can shoot kangaroos with little oversight or regulation. We believe the welfare of protected species such as kangaroos and wallabies should not be placed at the mercy of people who are not trained and competent. In fact, the killing of kangaroos should be totally banned by recreational shooters who are unskilled and careless unless the state government can ensure that higher standards are met with licence tests. No statistics are even available for the kangaroos who are wounded and escape, and who in this instance endure a long and painful death.

The National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes is virtually impossible to enforce thus permitting **serious breaches of animal welfare standards**. The Code of Practice requires that animals are killed by a single shot to the head, but even conservative estimates suggest that more than tens of thousands of the adult kangaroos commercially 'processed' each year are not killed in this manner. In four Australian states, the legal protections that *usually* apply to native wildlife are lifted so that kangaroos can be shot under commercial licences. This is an industry where extreme levels of cruelty exist and *it's all completely legal under current laws*. The laws therefore must change. The regulatory framework is clearly not working.

1. Historical and long-term health and well-being of kangaroos.

The main threats to macropods in Australia are habitat loss, altered fire regimes, introduced predators and now climate change. Developing land for human needs has also reduced the amount of natural space and land for kangaroos and other macropods. As natural space diminishes, so does habitat diversity including the great variety of forests, bushlands, grasslands, wetlands and deserts that exist in nature. The result is both a decline in the number of species and even fewer individuals of those populations survive. Introduced predators like foxes are believed to have contributed to the mainland extinction of the rufous hare wallaby, as well as pushing a number of native mammals such as brush-tailed bettongs and black-footed rock wallabies further towards extinction. Wild cats have also been associated with the demise of a number of native animals including the burrowing bettong and broad-faced potoroo. Climate change leading to reduced rainfall in parts of NSW as well as increased temperatures has and will continue to exacerbate existing threats such as changed fire regimes and could see macropods eliminated from parts of their current ranges. Claims of exploding populations with kangaroos are simply that, mere claims, and not scientifically valid. Kangaroos are slow breeding wildlife, only able to produce on average of one offspring per year at a reproductive age (3-4 years old). They are not prolific breeders. Kangaroo offspring rarely survive. In one of the best studies to date female red kangaroos were able to successfully raise just over 3 young to independence in their **own** lifetime on average. How many of these went onto be successful mothers is unknown. With the increasing number of mature females being slaughtered along with the diminishing numbers of adult males available, this reduces the ability of the population to repopulate. Matrilineal lines and bonds are also broken when large females are constantly killed which guarantees the survival of this species. Unfortunately, populations of kangaroos are seriously being wiped out and are not having time to recover or repopulate sufficiently. Adding to the killing of the joeys for further chance to repopulate, this situation is exacerbated even further. The government has not factored these issues at *all* into their study and code of practice- it simply is a code based on rules about how to commercially kill these animals. More research is needed to ensure that we do not as a state add them to our list of threatened species.

Our concern is that the NSW government must accept this fact that they are not prolific breeders. Along with the commercial and non-commercial shooting of kangaroos, high kill numbers that are reported and the ones that are not even reported and other challenges of drought, bushfires, climate change and predators, the kangaroo has an unknown future and the long-term health and well-being of this animal can now be questioned.

2. Accuracy with which kangaroo and other macropod numbers are calculated, and the means by which population health is assessed.

The film ecologist Ray Mjadwesch has denounced official surveys as “critically flawed” and shares research he says shows a rapid decline in every commercial kangaroo killing zone in Australia including NSW. The numbers of our kangaroos are falling rapidly. The government is under the impression that there are too many kangaroos, and this argument is used to prop up the industry and justify these killings and support the farming lobby. The government needs to **resource correct data** on the actual numbers in our state, otherwise with the current commercial slaughter of kangaroos we will see their numbers plummet even further.

Recent comments in March say that the state's kangaroo population dropped by nearly 40 per cent in five years, according to annual survey data from the Department of Planning, Industry and Environment (DPIE). The DPIE found numbers of red and grey kangaroos and wallaroos in New South Wales peaked at 17 million in 2016, dropped to 14 million in 2019 and fell to about 10.5 million in 2020. A loss of 6.5 million kangaroos. The commercial and non-commercial killing has continued during this period! Population reports on the NSW government website for red and grey kangaroos show the numbers have decreased significantly since 2016.

There has been increased global concern over this fact. Prior to the catastrophic bushfires of 2019-2020 in NSW, kangaroo population had been affected by an ongoing drought of many years and then there were the fires that also killed many more. Stuart Cairns, adjunct lecturer at the University of New England, called the decline "quite severe".

In Western NSW the numbers have dropped by about 45 per cent due to lack of food and water. At a specific site west of Broken Hill, numbers dropped from about 53 per square kilometre in 2016, to about 4 per square kilometre in 2020. Scientists even warn that current estimates of kangaroo numbers are *way off-target*, with faulty counting methods hugely inflating the estimated population of kangaroos when in reality these numbers could be much lower.

The lack of transparency around how kangaroo populations are estimated is a serious concern. *Aerial counts are not valid evidence as to the actual correct numbers of kangaroos and hence quotas have been set by the government on incorrect data.* **The government must acquire accurate information on kangaroo populations to substantiate the need to cull their populations.** The government therefore MUST review this industry and the cruelty that exists and gather current accurate, statistical data of kangaroo and wallaby populations with complete transparency and ‘no cover-ups’. Aerial counts of kangaroos by the government funded by taxpayers remains inaccessible to the Australian public. And why to maintain the vested interests of the commercial kangaroo industry and the farm lobby group for this cruel practice to continue.

3. Threats to kangaroos- climate change, drought, depletion of water supplies, bushfires, land clearing (agriculture, mining, urban development), exclusion fencing.

As already stated, kangaroos have a slow rate of reproduction. Kangaroo populations also crash during droughts, with up to 100 per cent joey mortality and up to 70 per cent adult mortality. So, their populations are not as healthy as the NSW government thinks! Climate change has seen a recent surge in natural disasters in NSW, and with extensive land clearing for mining, agriculture and urban sprawl and this continual sanctioned slaughter by our state government, this decimates their numbers even more.

We know that most of regional NSW had been in drought for many years prior to 2020, then the dreadful bushfires came resulting in the loss of many kangaroos and wiping out their habitat, food and water supplies for even the survivors.

runs a kangaroo sanctuary on the NSW South Coast within the **Mogo State Forest** and provides a safe environment to release native animals mainly kangaroos and wallabies back into the wild after their rehabilitation. After the dreadful catastrophic bushfires few kangaroos returned to her sanctuary. ‘The Fire’ is a short movie just been released, detailing the physical loss of this charity- based sanctuary Wild 2 Free due to these bushfires. This film captures the loss of our beloved kangaroos that fled the fire. Most of course died, and the ones around other areas along the east coast of NSW that managed to escape the bush areas on fire, unfortunately fled to the fields of the commercial slaughter of kangaroos.

The state government even allowed this slaughter to continue at this time, even though these kangaroos were seeking refuge from the fires a year ago!

In fact, the quota number of kills in this commercial slaughter after these horrific fires were actually INCREASED.

We are disgusted that this quota of commercial killings straight after the fires was increased because kangaroos were easy targets and vulnerable as they were escaping the fires. They miraculously survived the fires only to be shot. **How could our NSW government justify their actions here and do nothing about this situation? At the very least commercial and non-commercial killing of kangaroos should have been postponed, so as to give this animal the chance to recover after these fires!**

It is essential due to the above challenges the kangaroo has faced recently in NSW that accurate information be obtained as to their current populations. If all our kangaroos continue to be shot, injured and killed at the current rate allowed with the added risk of persistent drought and climate change, we may face a future where this iconic native animal is nothing but a memory. Kangaroos are seriously threatened, and some areas have suffered considerable population collapses. Kangaroos have less land today to feed and less freedom from human encroachment. The NSW government must devote more research into the current situation of kangaroos as a species that can survive.

Whilst the culling of kangaroos continues even during these unfavourable environmental conditions above, maternal nutrition and care becomes even more important for Young at Foot (YAF) orphaned joeys that are not euthanised and escape. High quality forage is not available or poor at best, at these times, so the YAF have no chance of survival and suffer a lingering death. This is an area of the industry that needs attention. It is utterly cruel to leave these defenceless joeys without their mothers to suffer. We MUST have better standards and policing of the number of female kangaroos that are killed. Or a better solution is do not kill female kangaroos, as their young need them especially in times of natural disasters, when these threats affect them even more with the ability to survive.

4. Current government policies and programs of management- quotas, culling licences, relief drought policies.

The Code of Practice is only a 'direction and guidance for kangaroo harvesters'. On the NSW government website, it mentions that to **allow kangaroos to be commercially harvested from your property** as quoted "It's best if culling is done by licensed harvesters, as it reduces the administrative burden on landholders, ensures kangaroos are shot humanely by trained professionals and supports local industry." This is not mandatory and because of this, killings can be done by non-commercial shooters whose standards are lower and may not have the skill to complete humane killings. The government therefore contradicts its own stand and says that "Animal welfare is an issue the NSW Government takes very seriously evidenced by a *robust regulatory system* to address animal cruelty including the *Prevention of Cruelty to Animals Act 1979* and underpinning Codes and Standards. In addition, the commercial kangaroo industry also operates under a *National Code of Practice for the humane shooting of kangaroos and wallabies for commercial purposes*. Compliance with this code is mandatory." If it is such a 'robust regulatory system', why is it not compulsory to have licensed shooters? And if the Code is mandatory, how is it enforced?

The 'robust regulatory system' mentioned is not as robust as one would think. The Act (Prevention of Cruelty to Animals Act 1979) is fundamentally flawed as it relies on non-government, charitable organisations (currently the NSW RSPCA and Animal Welfare League) to implement its provisions. These organisations are inadequately resourced by the NSW government relying on charitable donations by the community like ourselves to function. The legal responsibility for all actions to prevent cruelty to animals and bring to justice those who offend lies properly with the NSW Government. Unfortunately, the RSPCA and NSW Animal Welfare League are under-resourced (materially and human resources) by our state government to carry out the functions under the Act, and this has led to distressing and tragic outcomes for the animals involved and substantial failings in the operation of these charities. But we still need them as that is all we have- more financial support by the state government is needed to support these charities to prevent and prosecute and stop the animal cruelty especially in the slaughter of kangaroos. The NSW government easily quotes how committed they are to prevent animal cruelty through the Act 1979, so they have a responsibility to adequately fund these charities and stop the cruel slaughter of our kangaroos.

The NSW government is a contradiction! It does not sufficiently fund the charities to prevent the cruelty, but does promote, financially supports and even actively participates in the brutal cruel killing of tens of thousands of kangaroos across our state. If they support the cull of our wildlife, they have a duty of responsibility to set up an **office of compliance to ensure humane commercial killing takes place and the option by landholders to use non-commercial shooters is removed completely**. If they do this, the public's trust in the government may be restored, and the government will work towards showing they support a *robust regulatory system* to address animal cruelty.

This cruel industry **operates without public scrutiny** because most of the killings are done at night in remote areas in the Australian bush. Many kangaroos lose their lives to keep the commercial kangaroo industry thriving and to support the strong farming lobby with their own vested interests. There MUST be better enforcement of animal standards to prevent this cruelty, so more accountability with the use of independent night investigators financially resourced by the government into the bush, to enforce these standards and breaches of animal cruelty means revoking of licences. No more recreational shooters and non-commercial shooters without licences who do not have the skill to do one-head shots, causing instantaneous death of the kangaroo. Heavy penalties being issued for non-compliance of animal welfare standards is urgently required if the NSW government is committed to a *robust regulatory system* to address animal cruelty.

A two-year investigation — conducted by the Wildlife Protection Association of Australia (WPAA) and Animal Liberation NSW and based on information provided by a kangaroo industry 'whistleblower' — found evidence of unsustainable and damning practices in the kangaroo industry. Some 24 chillers (holding facilities for carcasses) around NSW were inspected and samples from carcasses taken for testing. This investigation revealed that:

- A large proportion (70-80%) of stored carcasses were non-preferred female kangaroos, indicating a likely current population imbalance. Therefore, there generally exists low numbers of (the larger preferred) males available to shoot. This is of great concern as these strong adult males are needed to maintain an ongoing healthy gene pool and are needed to repopulate the species.
- Many of the carcasses were barely above the (NSW) minimum permitted 'human consumption' weight of 13kg, and those females were unlikely to have even had a single joey — revealing once again an absence from the population of the larger adult kangaroos, another indicator that numbers of breeding females and males are declining.
- Carcasses swabbed by investigators were contaminated by dangerous bacteria, including E.coli, Streptococcus and Staphylococcus, so the meat was not even fit for consumption.

Even though the NSW government has set maximum kangaroo cull limits per licence there is no guarantee these rules are followed to the law and slaughter of kangaroos can exceed the permitted quota. A state office of compliance is needed to ensure rules are followed with a requirement for site-inspections by officers. Some states have even 'fast tracked permits' to allow landholders to kill even more kangaroos per property with no limit on the number of consecutive permits that could be approved. As a result, state permit killings have escalated.

Shooting target animals in the head is the most humane way to kill. However, when harvesters are rushed or tired or need to fulfil quotas of numbers in short time frames, short cuts will be taken to possibly immobilise animals and then inhumane killings involving conscious pain and suffering by the animal results. The landholder/farmer has a vested interest to get the job done quickly and as cheaply as possible and the shooter/harvester may take shortcuts to secure the contract and the cost will ALWAYS be the animal and a compromise of humane animal welfare standards being maintained. So, the government's role is not finished simply with the publication of a National Code of Practice and the job is done. It is crucial that the code be enforced by compliance officers with regular spot checks on both landholders and harvesters to ensure the code is upheld and breaches of inhumane conduct means suspension of licences. This is the only way it will work, and the community will begin to trust that the industry is trying to uphold better standards.

5. High infant mortality- 'in pouch' and 'at foot joeys', unrecorded deaths of orphans where females are killed.

Apart from the adult kangaroos that are killed or injured, the fate of orphaned young, too small to be of any commercial value to hunters, is grim. The joeys are bludgeoned to death or decapitated or even left to suffer exposure, starvation and predation as the 'collateral damage' of the killings. This is an utterly cruel practice that needs to stop even in the commercial killing of kangaroos.

Young-at-foot (YAF) can vary in their level of dependence on maternal care depending on their age and environmental conditions, especially food availability. If they are likely to suffer and have a poor chance of survival, they should be euthanised wherever possible. Older YAF are usually mobile and often flee after the female has been shot, therefore they can be difficult to euthanise. The 2020 *National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes* (the code) mentions "The relationship between kangaroo mothers, their offspring and the environment is complex and there is still much to learn. The advice provided in this procedure reflects our current knowledge and is based on the small number of studies that have examined a range of factors that can potentially affect the welfare and survival of orphaned kangaroo young. As new information becomes available the recommended practices may change". This Code is saying it simply does not have enough information on this issue that relates to the suffering especially for 'at foot joeys'. This is not good practice

and does not reflect even at a federal level (which the states are obliged to follow) humane animal welfare outcomes for these joeys.

Additionally, no statistics are available for the animals who are wounded and escape. Kangaroos have been found with blown-apart jaws from miss-shots but survived to endure a long and painful death from starvation. 'In pouch' joeys of shot mothers are either decapitated (if very small) or killed with a blow to the head. Eastern and Western Grey Kangaroos are not weaned until they are nearly 18 months old. 'A Shot in the Dark' a 2009 report on kangaroo harvesting noted 440,000 dependent young kangaroos are either clubbed to death or left to starve after their mothers are killed.

6. Regulatory compliance mechanisms for commercial and non-commercial killing of kangaroos according to Biodiversity Conservation Act 2016 and other regulations and codes.

Kangaroos, wallaroos and wallabies (collectively referred to here as kangaroos) are protected in New South Wales by the Biodiversity Conservation Act of 2016. However, often **how** they are killed in the cruelest way, does not show that they are protected even in death.

The Environment Protection and Biodiversity Conservation Act (EPBC Act) aims to also ensure that any commercial use of Australian native wildlife for the purposes of export is managed in an ecologically sustainable way and to promote the humane treatment of wildlife. It aims to protect species against exploitation. On both counts the NSW government has failed for the kangaroo. The kangaroo is definitely being exploited and not being killed humanely. Legal protections that usually apply to native wildlife are lifted so that kangaroos can be shot under commercial licences. Kangaroos therefore have no protection at all from recreational hunters or those who hold a license. They are the most disadvantaged native animal in Australia because of the money that can be made in Australian and overseas markets.

Compliance with the new code *National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes 2020* is a condition of all NSW kangaroo harvester licences. It is the responsibility of every licensee to ensure they are familiar with its contents and abide by the code. What is not clarified is **how** does the NSW government make sure that the licensee a) knows the code and 2) abides by the code. How is it enforced?

The recent 2020 Code does not require any additional training for harvesters but includes more detail on 'best-practice harvesting procedures' and clearer guidelines for harvesters with particular regard to minimising the suffering of dependent young. This Code does not guarantee these practices will be followed. There is only a 'recommendation' by the government to follow the Code. It relies solely on shooters doing the right thing led by their conscience and their ability to make clean shots so that the kangaroo dies instantly, and minimal suffering is involved. We doubt whether this Code will achieve any of these humane welfare outcomes if there is no legal obligation to do so. The Code says, "auditing procedures are designed to reflect the standards in the Code." What auditing procedures and how will this be monitored? Unless it is policed with accountability, animals will continue to be slaughtered inhumanely, especially when these killings are done at night when the government and public are in bed!

This Code has not even addressed the issue of non-commercial hunters adequately saying, "It was deemed simpler for states and territories to separate the competency requirements" The NSW government appears to focus on commercial kangaroo management and gives 'lip service' only to non-commercial shooters, whose licenses are issued by National Parks and Wildlife Service (NPWS) area offices. Non-commercial shooters have different skill levels and are more likely to wound the kangaroo or wallaby when attempting a head shot. Dr Trudy Sharp and Dr Steven McLeod found that: "Non-commercial shooting—when compliant with the relevant code of practice—has similar animal welfare impacts to commercial harvesting. However, if it is not conducted according to the code of practice, it can have extremely poor welfare outcomes."

The main point here is that non-commercial shooters with less technical skill in handling firearms and making clean shots, with little or no accountability to follow the Code will result in this cruel slaughter of our wildlife continuing. The new Code of 2020 has done nothing to improve animal welfare outcomes for kangaroos and wallabies as the government continues to accept lower standards for non-commercial shooters. The government permits non-commercial shooters to operate despite the fact they often lack the appropriate skill to minimise kangaroos suffering. We repeat that **recreational shooters and non-commercial shooters who do not have the skill to do clean head shots, causing instantaneous death of the kangaroos must be removed from the industry in NSW.**

State Governments rely on claims and allegations of “*overabundance*” and alleged consequential damage to farming land, to justify “*culling*” or “*harvesting*” kangaroos to satisfy local Wildlife Legislation and the Environment Protection Biodiversity Conservation Act 1999. This is to obtain a permit to cull protected native wildlife like the kangaroo for a commercial industry. This is wrong! The industry insists it follows all the Government guidelines relating to quotas, animal welfare, product handling and everything else. The guidelines are based on a false premise and voluntary, with most commercial hunting happening unmonitored at night in remote areas where surveillance is non-existent and compliance regarding humane shooting does not always follow.

Employing more on-site officers to check that these commercial killings are done according to the new Code and eradicating recreational shooters who are unskilled and careless hunters who simply want the thrill of killing our kangaroos is crucial. People such as this must be charged with breaking the law with fines or jail sentences as it is against the law to kill our native wildlife unless you hold a license.

Cover-ups exist in this industry to remove any evidence of cruelty. There has been noted many adult kangaroo carcasses have been beheaded, to hide inhumane shootings involving multiple shots and shattered jaws which have not resulted in the instantaneous death of the kangaroo. This is another reason why those without licences who do not have appropriate shooting skills to perform one head-shots must be kicked out of the industry!

Regulating these codes of practice by shooters must be impartial and done independently of the government because of the vested conflicts of interest with the government who derives an economy from this industry. Enforcing best practice must be done by an outside organisation that is focused on humane animal welfare outcomes only and this can therefore only be done by an animal welfare group or an independent investigative unit not connected to the government or industry. To win the public's trust the industry must have outside, independent assessments of a shooter's performance and regular on-site spot checks so the industry stays honest. Greed leads to corruption, leads to compromise of appropriate animal welfare standards, leads to short-cuts, animal cruelty and abuse in the industry.

"Harvesters must pass a recognised (or approved) shooting accuracy test every 5 years" as mentioned in the Code. This should be reduced to at least 3 years. Every 5 years is far too long a period of time, for harvesters to be assessed. If the government is committed to humane and improved animal welfare standards this time frame must be reduced to ensure that the shooter has good vision and shooting skills to achieve successive and successful head shots of kangaroos so that they die instantly to reduce their pain and suffering.

Regulatory compliance mechanisms must be improved. **Stunning is done in our Australian abattoirs- don't our wildlife deserve this basic humane standard prior to killing?** Stunning kangaroos before killing, to ensure the killing is humane and not cruel should be **compulsory** especially when you export kangaroo meat.

Even the meat is suspect because the harvesting process violates normal controls for food safety. On a typical night with spotlights shooters kill 40-50 kangaroos. Shooters then butcher the carcasses in the field and hang them on hooks in the rear of their vans. The carcasses attract bacteria, flies and insects as the shooters try to get more kangaroos. After several hours of shooting and travel, they are transferred to a field chiller. They stay there several days and then the rotting bodies go to a processing facility. This meat is riddled with bacteria. It is not fit for human consumption let alone as pet food. There is no controlled environment as shooting occurs in the outback with no policing of standards, no controls in place to prevent the decomposition process of the meat after shooting and no oversight of the handling of our wildlife. Targeting and shooting animals relies solely on the shooter abiding by the Code 2020 which is not enforced properly. The government so easily sets codes and rules but does not address this important question of adequate enforcement of the codes.

Codes 2.2 Harvesters must aim to shoot target animals in the head 2.3 Target animals must be clearly visible, stationary and standing upright. 2.4 When target animals are shot from a vehicle, the vehicle must be stationary. 2.5 If there is any concern that the shot animal has only been wounded and not killed, then no further animals can be shot until *all reasonable efforts* have been made to locate and euthanase the wounded animal. 2.6 No more than 3 target kangaroos or wallabies in a group can be shot before the carcasses are checked and retrieved by the harvester.

One of the enforcements of the new Code 2020 is that ‘*all reasonable efforts*’ must be made to locate animals that are wounded during shooting or otherwise injured during harvesting operations (e.g. hit by vehicle, fence entanglement). If left wounded or injured, animals can escape and suffer from pain and the disabling effects of the

injury. The onus is on harvesters apparently according to Code 2.5 to do their job properly to decrease pain and suffering of escaped wounded animals by seriously spending time to track them down to put them out of their misery, before shooting more animals. We doubt that this occurs as it based on the conscience of the shooter to do the right humane thing for the poor suffering kangaroo. If the shooter is time poor and needs to go to the next harvesting job and is paid an hourly rate, will this actually happen? He will more than likely continue with the killings until the job is done. Again, how will this code be implemented to check that harvesters are maintaining the code of 'reasonable efforts', and humane animal welfare practices are maintained.

'When shooting kangaroos and wallabies, the objective is to achieve instantaneous loss of consciousness and rapid death without regaining consciousness' which is a humane outcome for the animal when being killed. The responsibility is on the harvester to invest in the correct approved firearms and ammunition. Again, how will this be regulated by the NSW government.

In Code 2.6 "No more than 3 target kangaroos or wallabies in a group can be shot before the carcasses are checked and retrieved by the harvester". Who is watching that these requirements are followed according to the Code? The job needs to be done quickly. The government is very naïve to assume that shooters will always follow the Code.

7. Difficulty establishing accurate numbers killed by landholders-removal of drop tags.

Joey's orphaned in the hunt are left to die or have their heads crushed by hunters. They are the collateral damage and are not included in the actual number of deaths. Countless more kangaroo deaths go unrecorded as they are shot illegally by landowners for non-commercial purposes. The farmers just want to get rid of the kangaroos because they consider them competition to sheep, cattle and crops and the government is happy to go along with it, because no one is saying anything. Because of this fact it is difficult to establish accurate numbers killed by landholders when they are such a powerful lobby group wanting this cruel industry to continue.

There is a **lack of transparency** around how kangaroo populations are estimated. There exists no accurate numbers that are killed by landholders and no accurate figures on deaths of dependent and independent young. Aerial counts are not valid evidence as to the correct numbers of kangaroos and hence quotas set by the government are based on incorrect data. Scientists warn that estimates of kangaroo numbers in Australia are way off-target, with faulty counting methods hugely inflating the estimated national population of kangaroos when in reality these numbers are much lower. These population numbers are inflated to justify the ongoing slaughter of our wildlife and keep an industry going. Our kangaroo numbers are decreasing rapidly because of a corrupt industry.

8. Incentive to accelerate public and private conservation of kangaroos and other macropods.

Conservation groups in NSW should receive adequate funding from the state government to work with community groups to carry out surveys of some rock-wallaby populations and other threatened macropods and to determine and implement effective measures to help these species recover, such as developing fire and feral animal strategies. Extended fencing programs to protect threatened macropods from feral animals, recover in certain areas would also be beneficial. Habitat protection is vital to work on controlling introduced predators along with continuing surveying and monitoring to further understand species.

Landholders should be encouraged with financial incentives to assess whether their land is likely to be beneficial habitat for threatened macropods and protect and revegetate bushland for their use. They must receive support from local or state governments to do this work. Community residents should all be encouraged to take extra care driving through areas of known macropod habitat, especially at night and de-sex pets, particularly cats. This is to control unwanted litters and keep them inside at night, so they don't escape and become feral predators. Local councils should promote community participation in revegetation and tree planting schemes in their local area to restore habitat for macropods and other native species. These simple actions with support by our government would go a long way to accelerate public and private conservation of macropods.

The true reality of the mass killings of kangaroos occur on two levels – in the commercial industry and non-commercially. The new code *National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes 2020* only fulfils 'commercial' purposes. The NSW government has not adequately addressed the non-commercial harvesting of kangaroos in our state.

With an increase of natural disasters and "over-harvesting" our kangaroos may face extinction. Over-harvesting continues because of false 'overabundance' population claims and essentially to supply demand for the

commercial exploitation of kangaroos for markets within Australia as petfood (local supermarkets) or overseas as leather and meat exports.

The statement that kangaroos are shot because they compete with grazing animals is simply not true— **this mass slaughter is purely and simply a commercial kill of Australian wildlife.** Some skins and meat products are used domestically (a proportion of kangaroo meat goes into the Australian pet food market), and the rest is exported to other countries (two thirds to Europe) as leather or meat for human consumption.

Kangaroos are not and have never been "farmed animals" in Australia, nor were kangaroos 'farmed' by Australia's First Nations peoples. To some indigenous Australians, kangaroos are totemic. Kangaroos should be protected native wildlife, but they are not, simply regarded as a pest to be killed inhumanely for a commercial industry. There is the real possibility that kangaroos may face extinction as a result of 'over- harvesting' or commercial exploitation.

Overseas our image of cruelty towards our kangaroo is widely known. The EU are appalled that no stunning of animals prior to killing is taking place. *The slaughter of Kangaroos for export of body parts and flesh for human consumption, under an Australian Commonwealth Government approved "wildlife trade management plan", does not comply with the Legislation of the European Union namely Regulation 1099/200910, Killing of Animals.* Under this regulation, stunning animals before killing, (to ensure the killing is humane and not cruel) **is compulsory.** This regulation applies to animals 'culled for depopulation, disease control or other purposes and farmed animals.' The kangaroo slaughter fits this definition as being culled, and the stunning is not happening. An awareness campaign for the Australian public needs to be run so that people know what is happening to our kangaroo and why. *Most Australians do not know there is an overseas market involved and EU standards are being called into question.*

Further, the regulation requires products imported into the EU, to be accompanied with an attestation, certifying that requirements at least equivalent to those of the EU have been met. Investigations have revealed this cannot be certified. We must suspend the importation of kangaroo body parts and flesh for human consumption as the EU Regulations are not being complied with.

The EU have even said the Australian government's methods to calculate kangaroo populations have been called into question, and most likely are inflated, and there are flaws in the government's survey methods. So, we have overseas countries also questioning our governments on accurate population numbers.

Interestingly, kangaroo products including meat and leather are banned in the USA. Reports from the USA show that people are 'turned off' how Australia treats their kangaroo. China and Russia have suspended the sale of kangaroo meat also.

A public awareness campaign in NSW needs to be run to inform people that:

-Kangaroo killing, culling or harvesting whatever you want to call it, is cruel and inhumane.

-Due to the remote locations where shooting takes place, there is no control to enforce humane killings. The Code of Practice requires that animals be killed by a single shot to the head, but even conservative estimates suggest that more than tens of thousands of the adult kangaroos for commercial processing each year, *are not killed in this manner.*

- Obtain accurate information as to the current correct populations of kangaroos in NSW.

-Recognise that inhumane cruelty exists in the industry and document it with transparency.

-Set a code of practice that IS humane and regulated and enforced. This includes revoke commercial licences that do not maintain the humane standards. Non- commercial shooters must not be exempt from following the same humane welfare standards. Otherwise, the carnage and suffering will continue, these animals will continue to be brutalised and humane welfare outcomes will not exist.

This industry is inherently cruel and not in line with community expectations of our treatment of native animals. The kangaroo is an icon for Australia, and it identifies the spirit, freedom, and resilience of a species to be able to survive in a sometimes very hostile Australian environment, where they contend with drought, bushfire and less land. Added to this, severe climate change is another factor that the kangaroo will need to face to survive with less food and water availability.

The NSW government could have sought more feedback from Action Network, especially with the number of academics who have conducted exhaustive research in this field. Input from professionals must be more vigorously sought by the government to give more credibility to this Code of Practice as a workable document. Otherwise, public trust in the government in the commercial kangaroo industry to raise the standards of animal welfare will not

be forthcoming. Action Network's wealth of information on the ongoing issues associated with the exploitation of kangaroos would have been a much fairer portrayal of the problems facing our native kangaroo and its survival. Indigenous groups should have also been consulted by our state government. Kangaroos are seriously threatened, and some areas have suffered considerable population collapses. The Code is extremely biased towards culling this animal to solely serve the industry. Tokenistic references are made to humane animal welfare outcomes for kangaroos only to pretend that this has been considered to address community perceptions. However, real solutions have not been adequately provided.

Finally, we have an inquiry into the health and well-being of kangaroos and macropods in NSW. Native wildlife should be protected, not killed for profit. The regulatory framework is not working. The National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes sanctions cruelty. It is virtually impossible to enforce the standards without an independent body. And the NSW government cannot enforce humane welfare standards without bias.

Many overseas markets have already pulled away from kangaroo meat and others are questioning this mass slaughter of our wildlife with no effective monitoring of animal welfare standards. The question as to whether we should or should not subject kangaroos to mass killings is not limited to the apparent high numbers of kangaroos that are killed, or the cruelty of their death or the contamination of their meat which are all important issues but rather ***why has a commercial industry been allowed to continue based on what they consider is their view that kangaroos are pests. Kangaroos are native wildlife, they are not farmed animals.*** The commercial kangaroo industry has fulfilled the desire of the strong farming lobby with little if any input by the Australian public who have basically been kept in the dark on this issue. The kangaroo industry has the support of a government-backed solution to a 'so-called' problem that assumes population numbers are high. The NSW government regulates the industry by providing a shooting quota and a pathway to domestic and export markets. It set the codes of practice which are ineffective as it is not enforced properly. Enforcement of proper standards by independent bodies is the only way to promote humane animal welfare practices for killing kangaroos. An investigation into this corrupt industry that promotes secrecy to allow it to continue this dreadful cruelty towards our kangaroo, our national icon is well overdue.

Our native wildlife should be protected, not killed for profit.

Yours sincerely

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Other signatories

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