

**Submission
No 110**

INQUIRY INTO LICENCES TO HARM NATIVE ANIMALS

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Submission to the NSW Parliament Inquiry

Review of the “Licence to Harm” System

Dear Committee Members,

I am writing to oppose the current system that authorizes licenses for the injury or killing of native animals in New South Wales. I submit that the “license to harm” framework — including licenses to kill — should be abolished entirely, not reformed, and replaced with a science-led, non-lethal model of wildlife governance.

A Broader Environmental Health Crisis

While this inquiry focuses on NSW, the issues it seeks to address are part of a widespread and systemic failure of environmental health governance across Australia.

Native wildlife is under unprecedented pressure from deforestation, land clearing, habitat fragmentation, climate stressors, and expanding road networks. Wildlife corridors are being broken, forcing animals into increasingly dangerous landscapes. Road trauma has become one of the leading causes of death for many native species.

In just the past week alone, I have personally witnessed three wombats killed on roads in Victoria. These deaths are not rare or accidental — they are predictable outcomes of landscape-scale ecological disruption. Animals displaced by habitat loss are forced to move, cross roads, and enter human-dominated spaces, where mortality becomes inevitable.

When these same animals are then labelled as “problems” and subjected to lethal control, the system is compounding the very harm it has created.

Ecological Context: A System in Decline

Australia already has one of the highest rates of mammal extinction in the world. NSW ecosystems, like those across the country, are experiencing ongoing species decline and loss of ecological integrity.

Since 2017, almost 17,000 licenses have reportedly been issued in NSW, resulting in the deaths of approximately 1.9 million native animals. These figures demonstrate that lethal control is not rare, targeted, or exceptional — it is embedded as routine practice.

This approach is incompatible with modern conservation science.

Lethal Control Is Not Evidence-Based Wildlife Management

Decades of ecological and behavioural research show that lethal control:

Fails to deliver long-term population stability

Disrupts social structures and family groups

Reduces genetic diversity and ecosystem resilience

Triggers compensatory breeding and increased movement

Often increases, rather than resolves, human–wildlife conflict

Methods such as shooting, trapping, poisoning, and aerial culling cause significant suffering. Animals are frequently injured rather than killed outright, and dependent young are routinely left to starve or die unseen. These outcomes violate fundamental principles of animal welfare science.

Cruelty must not be repackaged as wildlife management.

Case Study: Greater Gliders and the Failure of Protection

Recent events involving the endangered greater glider (*Petauroides volans*) illustrate how conservation protections are failing in practice.

The greater glider is nationally listed as Endangered, yet logging has continued in known and mapped glider habitat. In documented cases, logging operations proceeded in these forests and within hours, dead gliders were found on site. In at least one instance, work was halted only after a deceased endangered glider was discovered near an active harvesting area.

Greater gliders rely entirely on large, old hollow-bearing trees for shelter and breeding — habitat features that take well over a century to form. Logging removes these structures instantly, exposing animals to predation, starvation, injury, and death.

These deaths were not accidental. They were predictable ecological outcomes.

Despite endangered listing, despite mapping, despite regulatory frameworks, animals were still killed. This demonstrates a critical truth:

protections that exist on paper are ineffective when systems that authorize harm override them in practice.

The “License to Kill” Mentality Undermines Conservation

The same underlying mindset allows both:

the continued destruction of endangered species habitat, and

the ongoing issuance of licenses to kill native animals under the guise of “management.”

In both cases, lethal outcomes are treated as acceptable collateral damage rather than as evidence of policy failure.

A system that authorizes killing — whether directly through shooting or indirectly through sanctioned habitat destruction — cannot coexist with genuine conservation outcomes.

Native animals are treated as expendable, rather than as:

sentient beings

members of family and social groups

integral components of complex ecological systems

Under such a framework, no species is truly protected.

Ban Licenses to Kill Native Animals

I urge the Committee to recommend a complete ban on licenses that authorize the intentional killing of native animals.

Wildlife policy must shift from reactive violence to prevention-focused, science-based coexistence strategies, including:

Habitat protection and restoration

Re-establishment of wildlife corridors

Wildlife-safe road design and fencing

Evidence-based deterrents and land-use planning

Community education and coexistence programs

These approaches address the root causes of conflict and are supported by conservation science.

Governance Must Be Led by Qualified Experts

Decisions that affect ecosystems, species survival, and ecological health must be guided by expertise, not political position.

Wildlife governance should be led by individuals with formal education and professional experience in disciplines such as:

Conservation biology

Ecology

Wildlife and land management

Animal welfare science

Environmental ethics

Being an elected official does not confer the scientific literacy required to manage complex ecological systems. Nor should individuals with personal interests in hunting or lethal animal use be involved in designing or overseeing wildlife protection frameworks.

Future governance structures must require:

Independent scientific advisory panels

Mandatory conflict-of-interest exclusions

Evidence-based, peer-reviewed decision-making

Transparent reporting and public accountability

The integrity of wildlife policy depends on independence, competence, and adherence to science.

Protect Sentient Animals and Ecosystem Function

Native animals are sentient beings who form family groups and play essential ecological roles. Wombats contribute to soil health and ecosystem engineering. Kangaroos are keystone species shaping grassland systems. Apex predators such as dingoes regulate trophic balance.

Removing these animals destabilizes entire landscapes.

Any system that permits mothers to be killed while dependent young are left to die is indefensible under both animal welfare science and ecological ethics.

Conclusion

The continued licensing of harm to native animals reflects a broader failure of environmental governance across Australia. The biodiversity crisis we face is not due to a lack of laws, but to systems that allow harm to override protection.

NSW has an opportunity to lead meaningful reform by:

- abolishing licences to kill native animals
- replacing lethal control with science-led coexistence strategies
- ensuring wildlife governance is led by qualified experts

Native animals are not expendable. They are integral to ecosystem health and have an intrinsic right to live safely on their own land.

Thank you for considering this submission.

Yours sincerely,

Simone Cull