



**The WORLD LEAGUE for PROTECTION of ANIMALS. Inc**  
PO Box 211, Gladesville, NSW 2111, Australia, Tel (02)9817 4892 Fax (02)9817 4509  
Web Address: [www.wlpa.org](http://www.wlpa.org) Email: [admin@wlpa.org](mailto:admin@wlpa.org)

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## **Submission on the Cruelty, Risks and Illegality of the Kangaroo Industry to the Hon. Peter Garrett, Federal Minister for the Environment**

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**This submission is from concerned environmental and animal protection groups and individuals signed at the end.**

17 June 2008

### **Dear Minister**

Congratulations on your new portfolios of Environment, Heritage and Arts and also on your principled stand against Japanese whaling. The Japanese whalers have accused Australia of hypocrisy in that we condone the killing of millions of kangaroos.

The situation for kangaroos is arguably worse today than ever before. The worst drought in one hundred years combined with significant commercial killing has hit kangaroo populations very severely. This population decline has also been exacerbated by demands of the kangaroo industry which is taking as many kangaroos as it can legally and in some cases illegally. Demand is currently exceeding supply.

We urge you to bring an end to the cruelty to kangaroos and ensure that your very important work in stopping the slaughter of whales is not undermined by allowing this cruel kangaroo industry to continue.

We, the undersigned organizations and individuals, ask that you immediately seek legal advice as to your obligations under The Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) and to review the legality of the currently approved wildlife trade management plans.

### **1.0 Increased number of females killed**

Dr Peter Mawson, Senior Zoologist from The Department of Environment and Conservation (WA) said in a personal communication to The Honourable Richard Jones, former Legislative Councilor that over 50% of the kangaroos currently being killed in WA are females.

It is understood that currently about 70% of kangaroos being killed in New South Wales are also adult females. The size of female kangaroos and the prescribed weight of female kangaroos indicate that these females are with a joey in pouch and probably one at foot.

This has led to a huge increase in the number of both pouch young and dependent young at foot dying, effectively killing three generations each time.

## **2.0 Young at foot and in pouch joeys**

Animal welfare standards for the commercial harvesting of kangaroos are detailed in the *National Code of Practice for the Humane Shooting of Kangaroos and Wallabies*. All kangaroos must be killed in accordance with this Code.

The current *National Code of Practice for the Humane Shooting of Kangaroos and Wallabies* however makes no provision for the dependent young at foot which are simply left to die. The new draft *National Code of Practice for the Humane Shooting of Kangaroos and Wallabies* recommends that young at foot are killed "by a single shot to the brain or heart where it can be delivered accurately and in safety using firearm and ammunition specified in Part C of Schedule 1". Part 6.1 (iii) states "*Young at foot must not be chased in order to catch them by hand. The risk is that the animal may escape only to die of starvation*". The new measures "*are to prevent young that cannot survive on their own dying through starvation, dehydration or predation.*"

This is the first time that it has been acknowledged that young at foot die when their mothers are shot. Until now they have been left out of the Code of Practice. This new recommendation however to shoot the young at foot is impractical and impossible to achieve as the shooters would not be able to determine which young at foot belong to which mothers and, in any case, after the mother is shot the others in the vicinity scatter in the darkness, effectively making the proposed Code unworkable.

The fact is that the young at foot and in pouch joeys are protected under the EPBC Act as they do not come within the kill quota and are not counted as coming within the kill number. The kill quota takes that number of kangaroos outside the protection of the act and legally provides that they can be killed. **The killing of the joeys at foot and in pouch is accordingly illegal and must be stopped.**

## **3.0 Cruelty**

In resolving whether to approve a wildlife trade management plan you must be satisfied that if an animal is killed, it is done in a way that is generally accepted to minimise pain and suffering.

The current Code does not comply with the EPBC Act and neither will the new draft Code. In fact the Code is not only virtually unenforceable, but also impossible to police, as the killing takes place at night in remote areas. The Code depends primarily on self-regulation for compliance.

The cruelty in the kangaroo industry is not only inherent but also rampant. The 'disposal' of in-pouch joeys by cutting their heads off with a knife or bashing against a hard surface - is so barbaric that if this method were used to put to death our pet animal, this would be deemed to be an offence under the Prevention of Cruelty to Animals Act.

Allowing animals to slowly starve to death or abandoning them to die of dehydration or predation would also be deemed to be an offence under this Act. A wildlife trade management plan that allowed these offences would not be in accord with state cruelty laws.

The proposal of using shotguns to kill out-of-pouch joeys will result in many injuries as petrified small young will scatter in the darkness (only a shot into the brain or the heart will result in instantaneous death). Further, not all adult kangaroos will be shot and killed outright. Even conservative studies by RSPCA indicate that 4% will not be killed instantly which equates to over 100,000 kangaroos each year. Injured kangaroos hop away to suffer a lingering horrific death. It is impossible (and impracticable) to chase wounded kangaroos in the impenetrable bush in order to put them out of their misery.

The industry is finding it necessary to target large numbers of females as there are not enough males to satisfy demand. In many cases when a female is killed, two of her joeys also die and this results in extraordinarily high levels of cruelty which would be unacceptable in any other animal industry.

For cruelty reasons alone you are obliged to reject the Wildlife Trade Management Plans which permit this level of brutality.

#### **4.0 Effects of climate change**

Further, the EPBC Act requires you to ensure the wildlife trade management plan adheres to the following:

- (a) the plan is consistent with the objects of Part 13A of the EPBC Act;
- (b) an assessment of the environmental impacts of the activities of the plan has been undertaken;
- (c) the plan includes management controls directed towards ensuring that the impacts of the activities covered by the plan are ecologically sustainable;
- (d) the activities in the plan are not detrimental to the species to which the plan relates or any relevant ecosystem; and
- (e) the plan includes measures to mitigate, monitor and respond to the environmental impacts of the activity covered by the plan.

In light of the looming impacts of climate change on kangaroo and other species of wildlife it is imperative that the Wildlife Trade Management Plan complies with all requirements of EPBC Act.

The late CSIRO biologist Alan Newsome who undertook research on red kangaroos found that high temperatures reduced the fertility of male kangaroos, potentially making them sterile. Tim Flannery in his book *Country* wrote "....reds rely on the odd good year to replenish their numbers, and if these become too widely spaced the population will crash."...."Newsome's study....filled me with fear for the future of the large kangaroos in the face of global warming."

We are alarmed by the fact that long term effects on the survival of kangaroos caused by rising temperatures and other climate changes brought about by global warming are not adequately understood or researched. The Bureau of Meteorology is predicting more record hot years due to climate change.

No wildlife trade management plan should be approved which does not adequately take into account the effects of climate change.

#### **5.0 Unsustainable growth of industry**

The kangaroo industry is growing at 7% a year and there is pressure to open up additional areas for commercial exploitation.

Pet meat processing comprises the largest proportion by volume of the industry with about 60-70% of kangaroos slaughtered being processed for pet meat. Leading industry figure Ray Borda of Borda Meats is quoted as saying that the industry wants to raise kangaroo meat to represent 8% of all Australian red meat consumption by 2010. Currently kangaroo meat represents less than 1% of the red meat market. To achieve the industry's goal the commercial quotas would need to be increased by 78% and the export markets closed. At present most meat for human consumption is exported.

The 2006 State of the Environment report prepared by an independent scientific committee, contained the following statement: "*At present, there are insufficient data available on actual kangaroo populations and population characteristics to demonstrate that harvesting does not have a detrimental impact either on the harvested species or their ecosystems.*" It also stated: "*No data that would give an indication as to whether harvesting is sustainable, for example, data on population trends, population structure or distribution of harvested species, appear to be available.*" This statement was removed from the report subsequently.

The kangaroo populations are under severe pressure from continuing drought and from the unknown and as yet unquantified effects of climate change. The industry is finding it necessary to target large numbers of adult females as there are not enough males to satisfy demand. When shooters are killing 50% females this means the tipping point has been reached, where populations can crash to extinction, according to the population model in "The Kangaroo Keepers" by H.J. Lavery.

The original rationale for the kangaroo industry as a tool to assist farmers and graziers to reduce competition pressure from kangaroos is now invalid as the competition has been shown to be far less than was previously thought. It is now regarded as an industry in its own right as the koala industry was in the 1920s and the platypus industry in the 1890s.

**Conclusion**

Just as the koala industry came to an abrupt end eighty years ago when koala populations plummeted it is now time to call an end to the kangaroo industry.

The level of cruelty being meted out to kangaroos, particularly the young as more and more females are targeted, is completely unacceptable to the community. The mass killing of helpless joeys disregards all standards of human decency.

It is not legal to approve Wildlife Trade Management Plans which do not take into account climate change or allow the illegal, unquantified and cruel killing of kangaroo young.

We, the undersigned organizations and individuals, ask that you immediately seek legal advice as to your obligations under the EPBC Act and to review the legality of the currently approved wildlife trade management plans in light of their clear deficiencies under the Act.

**We ask that you end this cruel industry immediately.**

<b><u>Name &amp; position</u></b>	<b><u>Organization</u> Name &amp; address</b>	<b><u>Contact :</u> E-mail address/ telephone number</b>
<b><u>Comments:</u></b>		