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### **Australia's faunal extinction crisis**

The Animal Justice Party (AJP) represents the interests of all animals as individual sentient beings. We are therefore concerned about endangered species for three reasons:

1. Listed endangered species are comprised of individual animals and all these animals, as individuals, are in danger from human actions.
2. The listed endangered species are sentinel species for the trajectory of all the other endangered species that are not yet listed (either for political reasons or because no-one is funded to do proper assessments), or species that soon will be endangered if government policies do not change.
3. Some of these listed endangered, actual endangered, and soon-to-be endangered species are also likely to be keystone species without which many other individual animal species might die, and further entire species become extinct.

Therefore, the lives and quality of life of many millions of individual animals, not just the listed endangered species, ride on the fate of the relatively few individual animals listed as endangered species.

The principal threats to these millions of animals are:

- habitat loss, due to land clearing and grazing by livestock, compounded by climate change (see also below);
- hunting (recreational, 'culling' and 'harvesting');
- climate change (e.g. increased severity and duration of drought leading to permanent desertification, increased severity and intensity of wildfires, increased flood risk, loss of surface and ground water aquifers, soil loss, dust storms, coastal inundation, and dieback of frost and snow dependent species in alpine areas);
- motor vehicle collisions; and
- air, water and soil pollution.

Other than climate change, which requires action at a global scale to replace fossil fuels with clean energy and livestock agriculture with plant agriculture (Australia as a nation is in an excellent position to contribute to both of these outcomes), the key solutions are really quite simple, currently lacking only the political will of governments:

- all further land clearing in Australia to be prohibited;
- all further killing of native animals in Australia, for any reason, to be prohibited;
- all land currently wasted growing 'livestock', or crops to feed 'livestock', to be replaced with wildlife habitat, greenhouse sinks and cropping (for human consumption) that is appropriate to the changed environmental conditions;
- no further building of roads that fragment wildlife habitat without full funding for adequate and appropriate wildlife corridors, along with incorporation of such corridors into existing road systems.

**a. the ongoing decline in the population and conservation status of Australia's nearly 500 threatened fauna species**

The AJP is aware of this ongoing decline from government reports and scholarly papers. We note, however that it is highly unlikely that all the endangered animal species in Australia are currently listed as endangered.

We also note that the same factors that are contributing to the decline of listed endangered species are likely to be contributing to the decline (towards extinction) of many other species that are currently regarded (correctly or incorrectly) as abundant.

**b. the wider ecological impact of faunal extinction**

Some faunal species (both endangered and those perceived to not yet be endangered) are keystone species. Wherever populations of these species are declining (let alone extinct) the many species of plant and animal that depend on the keystone species to maintain their environment cannot survive. Their decline is likely to lead to a domino effect, as the loss of one keystone species leads to the loss of another keystone species and so forth until there are no longer enough species left to maintain any Australian native ecosystem.

**c. the international and domestic obligations of the Commonwealth Government in conserving threatened fauna**

Australia is clearly failing its international obligations to conserve both its unique fauna species and its mega-biodiversity.

We do not think it is an exaggeration to suggest that several million Australians would love to see Australia taken to the International Court of Justice for its appalling treatment of its wildlife.

**d. the adequacy of Commonwealth environment laws, including but not limited to the Environment Protection and Biodiversity Conservation Act 1999, in providing sufficient protections for threatened fauna and against key threatening processes**

The Environment Protection and Biodiversity Conservation Act 1999 has proven astonishingly ineffective in protecting native animals against the extermination campaigns of the state governments.

The following are just a few examples of state-initiated mass destruction of native wildlife that is being permitted under the watch of the Australian Government and the EPBC Act (there are, of course, hundreds more).

- Huge land clearing continuing in all states, especially in Queensland where 900,000 mammals are estimated to lose their lives due to land clearing every year.
- In NSW, new laws allow for devastating deforestation and clearing of important wildlife habitat. At least 1,000 species of plants and animals are facing extinction, primarily as a result of habitat destruction.
- The NSW government has announced preposterous (i.e. biologically impossible) over-estimates of kangaroos for 'harvesting' quota purposes, and is now permitting farmers to slaughter this keystone native species at will;
- ACT government legislation has given the ACT government permission to kill native animals at any time, without a licence or any other justification, purely in order to avoid being subject to administrative challenge;
- ACT government legislation now allows the killing of kangaroos on the basis of a spurious and discredited (by CSIRO) notion of an ideal of one kangaroo per hectare.

Because of the nonsensical kangaroo counting methods currently used in most states, huge numbers of kangaroos are being 'culled' and 'harvested' during the current drought. Some independent experts estimate Eastern Grey Kangaroo numbers to be as low as 11% of their numbers at the time of European settlement), and anecdotal reports from rural Australians seem to confirm these estimates.

Kangaroos are clearly one of the species that are currently considered abundant for purely 'economic' and political reasons. They should, in fact, be seriously considered for threatened species status. It seems not at all unlikely that if the current drought in eastern Australia continues, Eastern Grey Kangaroos will have plunged from being (perceived to be) abundant all the way to extinct, in a matter of years.

**e. the adequacy and effectiveness of protections for critical habitat for threatened fauna under the Environment Protection and Biodiversity Conservation Act 1999;**

As mentioned above, the EPBC Act has failed to stop state governments from permitting the clearing of wildlife habitat and from slaughtering native animals in their millions.

State approvals for land clearing (i.e. wildlife habitat destruction) appear to be far too easy to obtain. In some cases, approval seems to be little more than a rubber stamp, for example in Queensland where "Clearing activities may occur ... by simply notifying the Department of Natural Resources and Mines".

Despite the urgent need for stronger prohibitions on land clearing, most state governments (e.g. NSW) seem to be determined to relax land clearing laws, rather than strengthening them.

Although land clearing is listed as a key threatening process (perhaps a more accurate description would be 'the key threatening process') under the EPBC Act, there is still no Threat Abatement Plan (TAP) to address this threat, presumably for political reasons. Such a plan is urgently needed.

**f. the adequacy of the management and extent of the National Reserve System, stewardship arrangements, covenants and connectivity through wildlife corridors in conserving threatened fauna**

The number of native animals killed on Australian roads is testament to the failure of any state or nationally-based approach to providing corridors and connectivity for native fauna.

The AJP makes the point once again, that it is not just species that are currently listed as endangered who need corridors by which to cross roads, farms and suburbs in search of food, water, mates and new territory - it is all native fauna. Providing such corridors is essential not only for saving (if it is even possible to save them) the species that are already either endangered or listed as endangered, but also to prevent the rest of Australian fauna from becoming endangered and, ultimately, extinct.

**g. the use of traditional knowledge and management for threatened species recovery and other outcomes as well as opportunities to expand the use of traditional knowledge and management for conservation**

One aspect of traditional knowledge and management, and a view that is strongly held by many Indigenous Australians, is that every animal in the environment, both native and naturalised, belongs to the land, and is part of the ecosystem. Australian governments appear to be hell-bent on ignoring this aspect of Indigenous understanding.

**h. the adequacy of existing funding streams for implementing threatened species recovery plans and preventing threatened fauna loss in general**

While it is important to try to keep an accurate list of species that are endangered, the current focus of recovery plans on listed threatened fauna is misguided because of the interdependence of all fauna and all flora; in other words, because of the nature of ecosystems.

The AJP recommends a holistic approach to funding. Such an approach would protect individual animals, including animals listed as threatened species, members of threatened species that are not yet listed, and other native animals, all of whom will become endangered in the near future if Australia does not change its approach to protecting wildlife.

Such an approach would focus on protecting habitat, restoring and resuming habitat from livestock pastures, prohibiting all recreational hunting and all other intentional killing of animals, and providing connectivity to allow wildlife movements and protect animals from car collisions.

**i. the adequacy of existing monitoring practices in relation to the threatened fauna assessment and adaptive management responses**

If monitoring practices in relation to listed threatened fauna are even remotely like government over-estimates of kangaroos, they are clearly in urgent need of review.

“Adaptive management” is a really good idea and should be practised, rather than just a phrase trotted out by governments that wish to delude people into thinking they are actually doing something.

**j. the adequacy of existing assessment processes for identifying threatened fauna conservation status**

As already indicated, the APJ is of the view that assessment processes for identifying fauna conservation status are woefully inadequate, corrupted by economic interests, and highly politicised.

One indication of this is the existence of TAPs for a range of naturalised species. The writers of these plans themselves were able to find scant evidence that naturalised species (especially cats and pigs) have any significant environmental impacts in mainland Australia.

The plans for managing these alleged but undemonstrated threats invariably focus on lethal control. Aside from the ethical issues of both the killing itself and the methods used for killing these animals, it is abundantly clear that lethal control (unless it can attain 100% eradication which has not yet proven possible except on off-shore islands) maintains significantly **higher** populations of fast-breeding animals than leaving them alone to stabilise in equilibrium with their environment.

It would almost seem that these TAPs are designed to actually increase populations of these undesired animals to levels where they really might start to be an environmental problem (or at least highly visible), presumably for the purpose of blaming them for environmental disasters which are actually the result of habitat loss, habitat fragmentation, climate change, human hunting, pollution and motor vehicles.

Another indication of the ineffectiveness of these processes is the failure of the Australian government to produce a TAP for either land-clearing or anthropogenic climate change - the two greatest threats facing Australian biodiversity.

**k. the adequacy of existing compliance mechanisms for enforcing Commonwealth environment law; and**

Compliance mechanisms are clearly a major issue. Since farmers and pleasure killers (sometimes referred to as 'recreational hunters') do not comply even with the minimalist requirements that already exist under the EPBC Act and other legislation, it seems hardly likely they would comply with the much stricter regime recommended by the AJP.

On the other hand, once recreational killing is prohibited in its totality, it will be much easier to enforce than when people are theoretically allowed to kill some animals but not others. Similarly, if the waste lands that are currently being used for 'livestock' (and in NSW, primarily for starving 'livestock' at the moment) were resumed by government and replanted (perhaps with advice from Israel) with crops and other vegetation that are suited to the state of the land as it is now (i.e. following clearing and decades of inappropriate grazing, exacerbated by climate change), there would be no incentive nor opportunity for those desperate farmers to break the law by clearing more land or shooting wildlife.

**l. any related matters**

Of major concern for the AJP, is that the outcome of this inquiry will be the business-as-usual of 'let's kill the ferals so people think we're doing something'.

It is yet to be demonstrated that any naturalised species really is a problem for any of Australia's endangered species (listed or unlisted). Furthermore, it appears that there has been little research conducted into the deleterious environmental impacts of reducing or removing

these naturalised populations now they are part of the ecosystem, even if it were possible to do so. However, if these species are (seriously) considered to be a problem (rather than just a convenient political scapegoat), there are two easy steps for solving it. The first of these steps is cost-free, the second, more expensive; but think of all the money that could be saved from not having to maintain lethal control measures in perpetuity!

Step 1: stop all lethal control. Lethal control invariably maintains higher than natural populations of fast-breeding animals for as long as the killing continues. This is because sustained killing constantly empties niches which are then filled with younger, more fertile individuals, who need less territory per capita - so there are therefore more of them, perpetually breeding faster.

Step 2: start employing fertility control measures that have some hope of actually eliminating these populations.

Thank you again for the opportunity to submit to this inquiry. Our comments on this matter represent the views of millions of Australians who are sickened and furious about the treatment of wild animals by all levels of Australian governments. We hope our comments and suggestions will lead to life-saving, species-saving and ecosystem-saving action.

Yours sincerely

Frankie Seymour  
On behalf of the Animal Justice Party

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