



Senate Inquiry into the Environment Protection and Biodiversity Conservation Act.

Wildlife Protection Association of Australia Inc. 4/9/08

Thank you for the opportunity to comment on one of the least effective Acts that has ever been introduced into the Australian Legislation. Through its inadequacy, this Act has been directly responsible for the demise of kangaroo populations across Australia, and the cause of some very inhumane treatment of our wildlife, especially our kangaroos.

After four failed Appeals through the Federal Administrative Appeals Tribunal against kangaroo and wallaby management Plans, we have to say that the EPBC Act needs to be seriously strengthened, or scrapped.

Over the last 10 years the Act has been progressively weakened, and in the last year of the Howard government, our rights to Appeal were removed altogether. We have said it many times and we say it again, the EPBC Act is there to protect Industry, not to protect wildlife. If this Senate Inquiry cannot come to grips with the protection of our wildlife, the Inquiry should recommend that the EPBC Act should be dumped. Then a new Act should be developed which does focus on wildlife protection, rather than protection of an appalling bad Industry that brings great shame on all Australians, the commercial slaughter of kangaroos.

Wildlife Management Plans are inconsistent with the objects of Part 13A of the *Environment Protection and Biodiversity Conservation Act 1999 (Cth)* (EPBC Act).

The Act fails in the following regards to approved Wildlife Management Plans for macropods.

The Act fails to ensure that Wildlife Management Plans are consistent with some or all of the following objects of the Act.

- (a) to ensure that Australia complies with its obligations under the CITES and Biodiversity Convention;
- (b) to protect wildlife that may be adversely affected by trade;
- (c) to promote the conservation of biodiversity in Australian and other countries;
- (d) to ensure that any commercial utilisation of Australian native wildlife for the purposes of export is managed in an ecological sustainable way;
- (e) to promote the humane treatment of wildlife;
- (f) to ensure that the precautionary principle is taken into account in making decisions relating to the utilisation of wildlife.'

Under section 303F0(3), the Minister must not declare a plan unless the Minister is satisfied that the plan is consistent with the objects of Part 3A.

The Act fails to ensure that the following matters relating to Wildlife Management Plans are adequately addressed;

1. Whether the Wildlife Management Plan is consistent with ensuring that Australia complies with its obligations under CITES and the Biodiversity Convention.
2. Whether the Wildlife Management Plan adequately protects Kangaroos that may be adversely affected by trade.
3. Whether the Wildlife Management Plan promotes of conservation of biodiversity in Australia, including the biodiversity of Kangaroo populations and their respective habitats.
4. Whether the commercial utilisation of Kangaroos for the purpose of export is managed in an ecologically sustainable way.
5. Whether the Wildlife Management Plan promotes the humane treatment of the Kangaroos (for example, by reference to the Code and review of the Code and the practical reality of Kangaroo shooting.)
6. Whether the 'precautionary principle' has been properly interpreted in the Wildlife Management Plan and whether it has been applied in relation to making decisions about the utilisation of Kangaroos.

The Act fails to ensure that the assessment of the environmental impacts of the activities covered by the Wildlife Management Plan is adequate in the following matters.

1. the status of Kangaroos in the wild;
2. the extent of the habitat of Kangaroos;
3. the threats to Kangaroos and the impact of activities covered by the Plan (shooting of Kangaroos, commercial utilisation and trade) on the habitat or relevant ecosystems.

The Act fails to ensure that the management controls within a Wildlife Management Plan are directed towards ensuring that impacts of the activities covered by the Plan on;

1. the taxon affected by the Plan;
2. the taxon to be affected by activities covered by the Plan;
3. the relevant ecosystems; and are not ecologically sustainable.

The Act fails to ensure that management controls included in the Wildlife Management Plan are adequate and directed towards ensuring that the impacts of the activities covered by the Plan are ecologically sustainable.

The Act fails to ensure that activities covered by a Wildlife Management Plan will be detrimental to;

1. the survival of a taxon to which a Wildlife Management Plan relates;
2. the conservation status of a taxon to which a Wildlife Management Plan relates; and to the relevant ecosystems.

The Act fails to ensure that measures within a Wildlife Management Plan will be effective to;

1. mitigate and/or minimise the environmental impact of the activities covered by a Wildlife Management Plan;
2. monitor the environmental impact of the activities covered by a Wildlife Management Plan; and respond to the changes in the environmental impact of the activities of a Wildlife Management Plan.

The Act fails to ensure that the conditions required under Regulation 9A.05(4) of the Environment Protection and Biodiversity Conservation Regulations 2000 (Cth) will be complied with.

For section 303FO(3)(f), the conditions under Regulation 9A.05 of the EPBC Regulations are as follows;

- (a) The animal is taken, transported and held in a way that is known to result in minimal stress and risk of injury to the animal;
- (b) If the animal is killed, it is done in a way that is generally accepted to minimise pain and suffering.



The photo above shows kangaroos in a chiller box with short necks....the animals have been neck shot...against the Code of Practice!

The Act fails to ensure that the practical reality of lack of compliance with the Federal Code of Practice in the Kangaroo industry and whether compliance with the Code will 'minimise pain and suffering' to Kangaroos killed.

The Act fails to recognise the realities of training people to shoot in the Kangaroo industry, and wether fatigue, incompetence, weather, fitness contribute to the Code not being complied with, and animals being wounded and not killed in accordance with the Code.

The Act fails to recognise that there is no effective legislation in any State relating to the protection, conservation or management of specimens to which a Wildlife Management Plan relates.

The Act fails to recognise the requirements of the tagging and quota system in all States, and the inadequacy of that system, including the determination of population levels within the Kangaroos in that particular State, and on which the quota system is based.

The Act fails to address the ineffectiveness of the State legislation for the protection, conservation or management of Kangaroos.

The Act fails to ensure that the humane treatment of wildlife is addressed. A "Code of Practice" that recommends that when a macropod mother is killed, her baby is wrenched for the mothers pouch and decapitated, or has its head smashed in with an iron bar, is hardly adequately addressing humane issues. This whole section needs to be improved to reflect modern community expectations.



Above; A joey with its head bashed as required under the Federal Code of Practice. The EPBC Act allows and supports this disgusting practice.

A recent Report by the Australian Society for Kangaroos (below) points out the consequences of the failure of the EPBC Act to protect kangaroos.

The following report exposes our kangaroos in crisis, the world's second most recognized symbol, on the brink of extinction, across NSW, Queensland and South Australia, decimated by a commercial trade in leather and meat and crippling drought, and condoned by federal and state governments, and sanctioned by useless State and Federal Legislation. This report also unveils decades of propaganda and myth, used to justify a cruel and unsustainable industry, the world's largest wildlife massacre, the Commercial Kangaroo Industry.

The following statistics are taken from Queensland, NSW and South Australian government data, which has recorded kangaroo populations since the 1970s, and up to 2007.

Kangaroos on the Brink

Kangaroos are commercially hunted across New South Wales, Queensland, South Australia and Western Australia. They are sold as pet food and leather. Their skins are sold to international shoe companies such as Adidas, Nike, Reebok, Puma, Florsheim and various other European and American shoe manufacturers. The Federal Government is responsible for monitoring the industry in the commercial hunting states, and is bound by the Environmental Protection Biodiversity and Conservation Act 1999, to ensure the protection of biodiversity and native species.

Tragically however the Federal and state governments have failed to protect kangaroos, with government data exposing a commercial trade in leather and meat, combined with severe drought, decimating kangaroos to the edge of extinction across most New South Wales, Queensland and South Australia. Red Kangaroos, Western and Eastern Grey Kangaroos, Wallaroos and Euros, have been hunted to critical levels of less than 5 kangaroos per square kilometer, densities defined by the Murray Darling Report as "quasi extinction" and meaning, "The nominal value of kangaroo densities taken to indicate the effective loss of the species" (Hacker et al, 2004, p.62)

The Murray Darling Report is a scientific report published by the Murray Darling Commission and written by government and independent scientists. It makes clear warnings regarding the risks of hunting kangaroos below 5 kangaroos sq/km ('quasi extinction'). "Strategies that produce average densities of less than 5 kangaroos per square kilometer would result in minimum densities of less than 2 kangaroos per square kilometer, and could be considered a threat to species conservation" (Hacker et al, 2004, p51)

As stated earlier, all commercially hunted kangaroos are now "quasi extinct" across most of New South Wales, Queensland and South Australia, and as predicted by the Murray Darling Report, led kangaroo numbers to fall even further to less than 2 per square kilometer across half of these states: "critical minimum densities are not clearly defined but populations below 2 kangaroos per square kilometer would generally be considered at risk of extinction" (Hacker et al, 2004, p47)

The following data was taken from State government departments and can be provided upon legitimate request.

SOUTH AUSTRALIA

The Commercial Hunting zones cover most of South Australia. There are almost no areas in South Australia where Kangaroos are fully protected.

Three kangaroo species are commercially hunted for their meat and skin in South Australia.- Red kangaroos, Western Grey Kangaroos and Euros.

Population counts for 2007 show Red and Western Grey Kangaroos at their lowest level ever recorded.

Across most of South Australia all three commercially hunted species are "quasi extinct".

Despite these critical levels, the South Australian Government has set a quota of 12-20% to be killed by the Kangaroo Industry between now and 2012.

SA Red Kangaroo

Red Kangaroos are at their lowest level ever recorded in South Australia.

Red Kangaroos are "quasi extinct" across 92% of South Australia, and at less than 2 k sq/km across 50% of the state.

Since 1998, across 42% of South Australia, 55-80% of Red Kangaroos have been lost.

The commercial hunting quota for 2008 for Red Kangaroos is 15-20% of the population, despite being at their lowest level ever.

Red Kangaroos only grow at a rate of 6-8% per year. Therefore they are being killed at a rate three times faster than they can breed (McLeod, UNSW, Kangaroo Myths and Realities, 2001,p. 104)

The commercial quota is the percentage of the population killed by the Commercial Kangaroo industry every year, for export as meat and skins.

This quota does not include pouch joeys killed by the shooter, ex pouch joeys orphaned and left to die, kangaroos killed privately by farmers,, kangaroos killed by local governments in National Parks and State forests, kangaroos killed illegally, kangaroos killed on the road or those who perish in drought, flood and bush fires, or when their habitat is lost to development. It has been estimated that the quota combined with all the other factors could double the quota figure that die each year.. SA Western Grey

Western Grey kangaroos are "quasi extinct" across 80% South Australia, and are at less than 2 kangaroos per sq/km across 60% of South Australia.

Since 1997 Western Grey Kangaroos have crashed by 72-80% across 42% of the state.

The South Australian government is allowing the Kangaroo Industry to kill 12-15% annually until 2012 when the management plan is reviewed.

Euros

Euros are "quasi extinct" across most South Australia, and at densities of less than 2 per km² across 63% South Australia.

Despite this the Commercial kill quota remain at 12-15% population.

Across half of South Australia, fifty percent of the kangaroos killed by the commercial industry are female. Killing 50% female from a wild population puts a species at great risk of extinction.

The average weight of kangaroos killed by the commercial industry in South Australia is just 22kg. These kangaroo are just 18 –24 months old and barely of breeding age. Kangaroos can weigh up to 90kg and live 25years.

“Research shows that the average age of Red Kangaroos is now only 2 years old” (Rowe, Kangaroo Myths and Realities, 2004,p.104)

This provides evidence to support the theory that the largest kangaroos have been wiped out by the industry for their superior skins. With few large kangaroos left, the industry is now forced to kill more females, and smaller and younger kangaroos; the breeding stock for the future.

The ongoing killing of the large males also creates a genetic disaster, weakening their genetic strength and leaving them unable to cope in drought and disease. This combined with the loss of critical mass that we are witnessing now, has the potential to wipe out the species.

Removing the alpha males from a mob also destroys social order, leaving females at the whim of younger and immature males and a mob with no structure or hierarchy. This is a dangerous and potentially fatal situation for the doe (female) and any joey she may have in pouch or at foot. It can lead to the death of the doe and her joeys from stress myopathy or exhaustion as she desperately tries to escape the forceful advances of the young males. The larger dominant males also play a role in integrating with the young joeys, playing with them from a very young age, and teaching them all the important survival techniques.

(All above data regarding South Australias kangaroo populations and “harvest” statistics were obtained from Thomsen.Dana, 2008, Ecologist-Kangaroos Management, SA Dept Environment and Heritage)

QUEENSLAND

The commercial kangaroo industry has access to 94% of the state, leaving only 6% of Queensland protected for kangaroos

Queensland Red Kangaroos, Eastern Grey Kangaroos and Wallaroos are killed at a rate of 10-20% of the population each year by the commercial kangaroo industry alone.

QLD Red Kangaroo

Red Kangaroos are “quasi extinct” across 70% of Queensland, and at densities of less than 1.6 sq/km across 40% of the state

Despite these critically low levels the Queensland Government has allowed the Kangaroo Industry to kill 15- 20% Red Kangaroos for the next four years, until the plan is reviewed in 2012.

Eastern Grey Kangaroo

Eastern Grey Kangaroos have crashed by 45-90% since 2001 across 62% of the state, and are "quasi extinct" across 36% Queensland.

Wallaroos

Wallaroos are "quasi extinct" across 86% of Qld, and at densities of less than 2 kangaroo sq/km across 52% of the state. Wallaroos have crashed by 65-99% across 25% of Queensland.

Despite these figures, the commercial industry will continue to kill 10-15% of the Eastern Grey and Wallaroos population, and 15-20% of the Red kangaroos in Queensland annually.

All Queensland data relating to population densities were obtained from the Queensland Environment Protection Agency, Macropod Management Unit, Geoff Lundiejenkins.

NEW SOUTH WALES

The Commercial Kangaroo Management Zone takes up 93% of NSW, leaving just 7% of the State protected habitat for kangaroos under the NPW Act Pt 4.

NSW Red Kangaroos

75-90% of Red Kangaroos have been decimated across 70% of NSW.

Red Kangaroos are "quasi extinct" at less than 3.3 k sq/km across 68% NSW.

Red Kangaroos are at their lowest level ever/ in two decades, across 62% NSW.

The commercial industry will kill 17% of Red kangaroos in NSW for export as leather and meat until 2012 when the Kangaroo Management Plan will be reviewed.

NSW Grey Kangaroos

Grey Kangaroos have crashed by 75-90% across 45% of NSW

Grey Kangaroos are at their lowest level ever/in 20 years across 42% of NSW.

Grey Kangaroos are "quasi extinct" across 36% of the state.

The Kangaroo Industry will slaughter 15% of these Grey Kangaroos annually for the next four years, when the Kangaroo Management Plan is reviewed.

Wallaroos

Wallaroos are "quasi extinct" (less than 3 per sq/km) across the entire NSW state.

70-85% of Wallaroos have been decimated across 75% of the state.

Wallaroos are also at their lowest level ever recorded in NSW.

Despite this catastrophic situation, the NSW government has set the quotas for Wallaroos at their highest level ever, allowing the commercial industry to slaughter 15% of the Wallaroo population until 2012, when the quotas are reviewed.

(All data above was taken from the "NSW Kangaroo Management Program-Quota Report for 2008". NSW Dept Environment and Conservation.)

THE FOLLOWING INFORMATION EXPOSES CENTURIES OF PROPOGANDA AND MYTH THAT HAS ALLOWED THE WORLDLS LARGEST WILDLIFE SLAUGHTER TO CONTINUE, AND SENT AN AUSTRALIAN ICON TO THE BRINK OF EXTINCTION.

For decades the Australian and State governments have assured the public that the commercial slaughter of our national icon is necessary to control kangaroo numbers, protect farmers, is economically and environmentally sustainable, and is no risk to kangaroo conservation.

The information and scientific reports discussed here exposes a commercial trade in kangaroos that is not only unnecessary and unsustainable, but is in breach of the Environmental Protection and Biodiversity Conservation Act 1999.

The Murray Darling Report, titled, 'Kangaroo Options in the Murray Darling Basin', was written in 2004 by Ron Hacker, Steven McLeod, John Duncan, Brigitte Tenhumberg and Udai Prahan. It clearly states that;

"Harvesting over most of the region ceases to be economically viable at densities considerably higher than those commonly regarded as minimum levels for conservation (5 k km²)" (Hacker et al, 2004,p.57) and;

"Reduction of kangaroo densities to less than 5 kangaroos per square kilometer over large areas would result in the demise of the kangaroo industry" (Hacker et al,2004,p.63.) Also,

"Pastoralists' would need to accept that reduction of kangaroos to very low densities (<5 k km²) over large areas is neither commercially feasible, ecologically defensible or economically justified"

So the Australian government is not only allowing a commercial wildlife trade to slaughter kangaroos in areas where they are at risk of extinction, but is supporting an industry that is unsustainable, destroying kangaroos faster than they can breed.

A literature review prepared for the Kangaroo Management Advisory Panel in March 2006, by the School of Botany and Zoology, Australian National University, ACT titled, 'Situation Analysis Report, Update on Current State of Scientific Knowledge on Kangaroos in the Environment, Including Ecological and Economic Impact and Effect of Culling' by Penny Olsen and Tim Low, confirms the findings of the Murray Darling Report in its executive summary, "Evidence suggests that commercial harvesting is not sustainable at densities that threaten any of the harvested species with extinction" (Olsen and Low, 2006,p.7)

'The Australian State of the Environment Report 2006' (2006 Australian State of the Environment Committee, 2006) in its original document (Animals Australia, 2007) also found that "No data that would give an indication as to whether (kangaroo) harvesting is sustainable, appears to be available"

In evidence given at the NSW AAT court proceedings, (Wildlife Protection Association Australia (Applicants) vs NSW Minister for Environment Heritage and the Arts (Respondent), No.N535 of 2007), it was found that within the 2008-2012 NSW Kangaroo Management Plan, there are no "trigger levels" with which to identify when the kangaroo

population was at risk. Therefore the current quotas would continue, despite critical densities, until 2012 when the current Kangaroo Management Plan expired.

The 'applicants' (WPAA) argued that "None of the Actions of the Plan provided for the suspension or reduction of the commercial killing of kangaroos if certain threshold situations are reached. There is no specific level of detriment or harm above which the Plan is suspended or the quotas are reduced" (AAT, No. N535 of 2007, p. 62)

The court also found that "The EPBC ACT requires the Management Plan include management controls to ensure that 'the impacts of the activities' on each of the species of kangaroos are ecologically sustainable, and that on the evidence the Tribunal cannot be satisfied that there are sufficient management controls included in the Plan that ensure the impacts are ecologically sustainable" (AAT, No. N535 of 2007, p. 51) and that

"Ecological sustainability requires some benefit of the use. The Plan cannot be shown to produce any conservation or biodiversity benefit. Killing part of the population is not necessary for the survival of the rest of the population of the species" (AAT, No. N535 of 2007, p. 62)

It is also important to note what was heard from the Minister for Environment Heritage and the Arts (Respondent) during the hearing:

"The respondent accepted that a quota of 17% per annum and the addition of the special quota would be unsustainable in the long-term" (AAT, No. N535 of 2007, p. 43)

In light of the statistics, the fact that all four species have already crashed by 50-70% between 2001 and 2007 alone, and the large scale quasi extinctions across three out of the four commercial hunting states, along with the real and pending threat of further drought, fire, flood, lack of habitat, water and food across Australia, it is highly likely that if the commercial and non commercial killing of kangaroos continues in New South Wales, Queensland and South Australia, there would be large scale irreversible extinctions of Red Kangaroos, Eastern and Western Grey Kangaroos, Wallaroos and Euros across three states within just a few years.

These statistics also expose a significant breach of the Environmental Protection and Biodiversity Conservation Act (Pt 13A) by the Australian Government and the Kangaroo Industry Association Australia, whereby they have failed to protect kangaroos at the extent of their range and ensure that the impacts of the industry are ecologically sustainable.

It has also failed in other aspects of the EPBC Act by inflicting significant cruelty on pouch joeys and ex pouch joeys in the manner in which they are dispatched (bashed to death or decapitated, and/or orphaned and left to die from starvation stress and exposure), therefore failing to "protect the humane treatment of wildlife" and by not taking a "precautionary principle when making decisions relating to the utilization of wildlife" (EPBC Act 1999, Pt 13A)

Scientific evidence now available exposes a large scale slaughter of protected native animals, the world's largest wildlife massacre, based on propaganda and myth, promoted by a cruel and unsustainable trade in a precious Australian icon. Government and independent scientists such as the CSIRO, Prof. Gordon Grigg (Environment Australia), Steven McLeod (University NSW, NSW Dept Primary Industries), Dr Tony Pople, Olsen and Low (School of Botany and Zoology, Australian National University, Canberra ACT) Dr David Croft (University NSW) and Ingrid Witte (NSW Dept Environment and Climate Change, UNSW) now agree that based on the evidence, kangaroos exert negligible

impact on pastoral and agriculture production, hence undermining the justification for this large scale destruction of native animals.

Ms Nicole Payne, Manager of Kangaroo Management Program, NSW Department Environment and Conservation, admits in the Administrative Appeals Tribunal that the commercial slaughter of kangaroos is; "not designed to achieve population control or damage mitigation, but for commercial harvesting" (AAT, No.535N of 2007, p.59)

Ms Payne also agreed with Olsen and Low (2006) in their Literature Review 'Update on Current State of Scientific Knowledge on Kangaroos in the Environment, Including Ecological Impact and Economic Impact and Effect of Culling' that "damage mitigation as grounds for harvesting is unfounded" and that "kangaroos provide some benefits to biodiversity and save for exceptional circumstances, are not competitors with sheep or cattle." (AAT, No.535N, p.59)

Pople and McLeod (2000, UNSW) are also referred to in the court proceedings as well as Olsen and Brayshaw (2000), and support the overriding evidence that between sheep and kangaroos "competition seldom occurs". (AAT, No.535 of 2007, p.70)

Within Olsen and Low's Literature Review, they also confirm these findings ;

"Indeed there is little convincing evidence of substantial damage by kangaroos to crops, pastoral production or rangelands, except in a few localized areas"(Olsen and Low, 2006, p.9)

Grigg (2002) proposed that kangaroos had a DSE (dry sheep equivalent) of just 0.2, meaning that kangaroos consume only one fifth that of sheep. He states "the removal of kangaroos will not bring expected benefits to woolgrowers in part because kangaroos are a much smaller component of total grazing pressure than is generally assumed". (Olsen and Low, 2006, p.69)

'The Australian State of the Environment Report' (Beeton et al, 2006, Indicator LD0-20)) supports these studies in its findings, that of the 60% of Australia that is made up of low intensity grazing land, kangaroos exert a grazing pressure of just 1-8%, compared to sheep and cattle who combined exert a grazing pressure of 92-99%.

Dr David Croft, in his paper, 'The Future of Kangaroos: Going Going Gone?' (Fowlers Gap Research Station and School of Biological, Earth and Environmental Sciences, University NSW, Sydney) disputes claims that kangaroos take advantage of 'rested' paddocks and inflict damage; "grazing pressure in the de-stocked paddocks had in effect significantly been reduced by the removal of 400 sheep. The amount of kangaroo dung never surpassed that of kangaroos in the stocked paddock, despite the absence of sheep". He goes on to say that;

"given the sedentary behaviour of mature individuals, there is no strong evidence that red kangaroos invade areas of improved pasture within a short period of time and remain there to cause long term damage"

In fact, further research from Fowlers Gap Research Station, (Witte, 2002, UNSW) reported a positive relationship between the biomass of both total pasture and green pasture and kangaroo density. Witte states that these findings support the conclusion that kangaroos and livestock do not compete strongly for food (at least in the rangelands), that resource availability drives the grazing systems and that "mixed species grazing regimes are more productive and ecologically sound." (AAT, No535N of 2007, p.71)

Olsen and Brayshaw (2003) agree;

"kangaroos do not appear to impact greatly on wool production and mixed grazing systems (cattle and kangaroos/sheep and kangaroos) tend to be most productive" (Olsen and Low,2006,p.69)

Literature written by ecologist Dan Ramp (University NSW) such as his paper 'Our 'common' wildlife may be the next 'sleeping' threatened species', describes the importance of kangaroos in protecting threatened and endangered species from decline. "Native herbivores such as kangaroos and wombats, play a vital role in ecosystem functioning but are often victimized and treated with lack of concern because of socio-political factors and historical value judgements rather than heeding biological and ecological information." (Ramp,200?,p.1)

He also refers to the findings of Smith and Knapp (2003) "It is widely recognized that species and ecosystem function are strongly linked. Common species can play key roles in conferring short-term resistance to reductions in ecosystem functions, as rare and uncommon species are lost from the system. We now have entered earths sixth mass extinction event, this time human driven, and yet the setting aside of protected areas may not be sufficient to prevent this loss of biodiversity...little research has rigorously quantified implications for biodiversity at local scales.

Many species that are now considered common will be effected, but unless we target those 'sleeper' species through monitoring of their distributions and functioning in ecosystems, managers will only be able to be reactive to declines, rather than proactively preventing them. (Ramp,200?,p.1)

David Croft challenges the myth that there are more kangaroos now than before white settlement, which is another unfounded argument used to justify decades of decimation of kangaroos across Australia.

He believes that the contention that there has never been so many kangaroos in Australia until the advent of farming and pastoralism is an absurdity. He bases his argument on the following facts.

"in the first several million years of occupancy of the Australian continent by the modern kangaroo fauna, who has the time machine to know?" (the counting of kangaroos in the commercial states did not start until the 1970s).

When calculating the countries ability to support sheep and cattle in present day conditions, Croft equates the lands ability to support the 2004 estimates of sheep and cattle at 22 million cattle and 105 million sheep, or 237 million Dry Sheep Equivalent. This is equivalent to the energy demands of 339 million to 1.185 billion kangaroos (at just 0.2- 0.7 DSE). The kangaroo population has been estimated at just 20 million in recent years, and therefore;

"Amazingly we have been clever enough to create pasture for the equivalent 7-24times the more generous estimate of the number of kangaroos currently in Australia yet this supposedly excessive number was unsustainable pre 1788" (Croft, Kangaroo Myths and Realities, 2004,p.236)

In regard to the myths that man made water sources have increased kangaroo populations, Croft believes; "This same landscape is populated with a vast network of drainage channels, ephemeral creeks, gilgais and clay pans. All of these can hold water for weeks to many months after a very modest rain", and;

"if you make the effort to observe the behaviour of kangaroos in the arid rangelands, as I have done for over 29 years, they will show that any water source, no matter how small and fetid, is acceptable and usable" (Croft, Kangaroo Myths and Realities, 2004, p.238)

He believes that not all their water requirements are required from drinking water as such, and; "water taken in with plant matter and created with oxidation of foodstuffs both add to the water budget" (Croft Kangaroo Myths and Realities, 2004, p.238)

Dr John Auty in his paper "Red Plague Grey Plague" also challenges the myth that there are more kangaroos now than before European settlement. In his paper he refers to a multitude of historical records and documents. " At first white settlement, kangaroos were widely distributed in large numbers"

"The CI Dingo was a poor predator on kangaroos and for this reason was not used by Aborigines in hunting them."

And finally, "The numbers of kangaroos present in Australia at the time of first European settlement can be estimated on the basis on the number of introduced herbivores supported on unimproved pasture and browse. The population was probably of the order of one to two hundred million" (Auty, 2004, Kangaroo Myths and Realities, p.62)

In regard to the principles of the commercial utilization of wildlife, in particular kangaroos, it is important to note that while the Commercial Kangaroo Industry is worth \$200 million annually, there are few who benefit from these profits, while the Australian community loses its most valuable environmental and tourist draw card.

Tourism is worth over \$70 billion dollars annually to Australia, and with our native wildlife being one of the main attractions for international tourists, kangaroos are worth more to us alive than dead. According to a recent survey, the kangaroo image was the second most recognized symbol in the world, second only to the Statue of Liberty (O'Brien, 2005, p.21).

As part of the same survey, international tourists were polled at Sydney airport, and it was found that half the international tourists wanted to see kangaroos or other wildlife as part of the visit. One quarter reported they had not seen the kangaroos they wanted to see during their visit. (O'Brien, 2005, p.21) The Kangaroo Industry and the Australian Government is decimating our tourist icon for just \$1 kilo for its meat, and around \$10 for its skin.

Tourism is worth three hundred and fifty times the value of the industry that is decimating our kangaroos, and with the current statistics and dire forecasts, it is clear the Kangaroo Industry is entirely unsustainable, with our kangaroos unable to keep up with the demand.

If we were to refer only to the scientific information within this document, we could safely say that the kangaroo industry is unsustainable and in decline, taking our precious National symbol down with it, and destroying one of our main assets from one of our most profitable industries, the Australian Tourism Industry.

SUMMARY

Since 1980, 73 million kangaroos have been killed by the Kangaroo Industry and turned into pet food and sports shoes. Around 14 million pouch joeys have been bashed to death or decapitated, and 7 million young at foot joeys have been orphaned, and left to

die a slow and lonely death from stress, starvation, and exposure. This combined with years of intense drought, floods and bush fires, has seen Red Kangaroos, Western Grey Kangaroos, Eastern Grey Kangaroos, Wallaroos and Euros plummet to densities of less than 5 per square kilometer ("quasi extinct") across most of Queensland, New South Wales and South Australia.

These species are now at risk of extinction in these states, and if the commercial industry is allowed to continue, scientific forecasts predict mass extinctions of Red, Western and Eastern Grey Kangaroo, Wallaroos and Euros, across most of New South Wales, Queensland and South Australia.

We therefore make an urgent request, that the Australian Government impose an immediate moratorium on the commercial and non-commercial slaughter of kangaroos across New South Wales, South Australia and Queensland, for the sake of our country, for the sake of our environment, for the sake of our economy, for the sake of our reputation, and for the sake of our Icon.

Now, more than ever before, its time to stop killing kangaroos!

REFERENCES

Administrative Appeals Tribunal of Australia, General Administrative Division, NSW District Registry, No.535 of 2007, Submissions for the Applicant.

Beeton.RJS, Buckley.K, Jones.G, Morgan.D,Reicht.RE, Trewin.D, "Australian State of the Environment 2006", Independent Report to the Australian Minister for Environment and Heritage. www.environment.gov.au/soe/2006/publications/report/index.html

Croft.D, and Wilson. M, "Kangaroo Myths and Realities", (2005), Australian Wildlife Protection Council, Melbourne, Australia.

CSIRO- <http://www.publish.csiro.au/paper/WR9740027.htm>

Environment Protection and Biodiversity Act 1999,
www.environment.gov.au/epbc/index.html -30k

Hacker.R, McLeod.S, Drunan.J, Tenhumberg.B, Prahlan.U, (2004), "Kangaroo Options in the Murray Darling Basin", Murray Darling Commission,NSW Agriculture, Canberra, ACT. <http://publication.mdbc.gov.au/product.info.php?products id=48>

OBrien.P, 2005, "Kangaroos, Our Gentle Aussie Icons", Wildlife Protection Association Australia, Beerwah, Queensland, Australia.

Olsen.P, and Low.T, 2006, "Update on Current State of Scientific Knowledge on Kangaroos in the Environment, Including Ecological and Economic Impact and Effect of Culling" School of Botany and Zoology, Australia National University, Canberra, ACT) Ramp. D and Roger. E, "Our 'common' wildlife may be our next 'sleeping' threatened species", School Biological, Earth and Environmental Sciences, University of NSW, Sydney, NSW, Australia.

This Report is posted online here.....

<http://www.kangaroo-protection-coalition.com/kangaroo-extinction.html>

Meanwhile the commercial kangaroo Industry shudders along, protected by the EPBC Act which does little to protect kangaroos, or our other wildlife.

Pat OBrien, President
Wildlife Protection Association of Australia Inc.
Coordinator, National Kangaroo Protection Coalition
Wildlife Representative, Animals Australia

www.wildlifeprotectaust.org.au
www.kangarooslaughter.com
www.kangaroo-protection-coalition.com
www.australian-backyard-wildlife.com
email, pat@wildlifeprotectaust.org.au