

Community consultation report

Draft South Australian Commercial Kangaroo
Management Plan 2025-2029



Government
of South Australia

Department for
Environment and Water

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Introduction

The draft South Australian Commercial Kangaroo Management Plan 2025-2029 (the plan) will replace the South Australian Commercial Kangaroo Management Plan 2020-2024 due to expire 31 December 2024. The overarching goal of the plan is to provide for the sustainable and humane management of kangaroo species referred to in the plan. The plan outlines how the Department for Environment and Water (DEW) will achieve this goal through the following seven aims;

- Ensure humane treatment of kangaroos
- Promote community awareness and participation
- Manage impacts of kangaroos on land condition
- Monitor kangaroo populations
- Monitor industry compliance
- Facilitate adaptive management and research
- Undertake program reporting and review

The plan also establishes which kangaroo species may be harvested and where harvesting can occur by defining commercial harvest regions, which are then broken down into sub-regions.

The purpose of consultation was to engage with a diverse range of stakeholders regarding the five key changes to the plan. Under section 60I of the *National Parks and Wildlife Act 1972*, the plan is required to be released for public consultation for at least three months before the Minister may endorse the plan.

The main portal for consultation was the South Australian Government YourSAy website, however stakeholders were also invited to provide feedback via email and letters. The draft plan was available for comment from 13 June to 15 September 2024.

The management plan also acts as the approved Wildlife Trade Management Plan under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), approved by the Australian Government Minister for the Environment and Water. The Wildlife Trade Management Plan allows for the international export of kangaroo products from South Australia and the plan is valid for a maximum of 5 years. As per the requirements of the EPBC Act the plan must undergo a separate 20 business day public consultation run by the Australian Government Department of Climate Change, Energy, the Environment and Water. The results of this consultation are also included in this report as the plan cannot be finalised before the second consultation is completed.

Background

The Department for Environment and Water (DEW) regulates the commercial kangaroo harvest in South Australia via the *National Parks and Wildlife Act 1972* (NPW Act), associated regulations and a management plan approved under section 60I of the NPW Act. The current plan is entitled the SA Commercial Kangaroo Management Plan 2020-2024.

This plan also acts as the approved Wildlife Trade Management Plan under the *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act), which allows for the export of kangaroo products from Australia. A wildlife trade management plan may be in place for up to five years. Therefore, the plan is revised and a new plan developed every 5 years, which enables the latest policy and scientific advice to be incorporated into the plan.

The SA Commercial Kangaroo Management Plan 2020-2024 made significant changes to the commercial harvesting of kangaroos in South Australia. The plan included the following:

- Expansion of the commercial zone into the southern parts of the state, including Yorke Peninsula, Adelaide Hills, Fleurieu Peninsula, Kangaroo Island and the South East
- Allowing the harvest of the Tammar Wallaby (*Macropus eugenii*), Eastern Grey Kangaroo (*Macropus giganteus*) and Kangaroo Island sub-species of Western Grey Kangaroo (*Macropus fuliginosus fuliginosus*).
- Establishing a risk-based approach to survey effort and quota setting
- Changes to kangaroo survey frequency and the way harvest quotas are calculated, including the use of population models to estimate populations and set quotas in areas with long-term data.

The changes made to the draft SA Commercial Kangaroo Management Plan 2025-2029 build on those made in the previous plan.

The key changes to the plan include:

1. Prioritising conservation and welfare during emergency events, such as widespread bushfires, by quickly amending quota or suspending harvest in affected harvest regions – the need to formalise the ability for DEW to close harvest regions as needed become evident during the Kangaroo Island 2019/20 fires when Kangaroo Island was closed to commercial harvesting only a few weeks after it was first opened for commercial harvesting.
2. Introducing a more flexible, risk-based approach to kangaroo surveying so additional survey effort can go into areas with high harvest – the previous plan required each sub-region to be surveyed every 3 years when the harvest was high enough (above a specific threshold). This plan removes the 3-year requirement and places more importance on the risk assessment conducted at the beginning of the year to prioritise areas for survey.
3. Ability to carry over quotas for up to 3 years without reducing the quota to 10% of the population estimate – the previous plan required quotas to be reduced to 10% of the population estimate when a population estimate was carried over from a previous year. This plan removes that requirement and allows the original quota to be carried over for up to 3 years, however, if DEW is concerned that environmental conditions have changed significantly between survey years, quotas can still be reduced. This change aligns SA with NSW kangaroo management program quota setting procedures in areas that are not surveyed each year.
4. Enabling the harvesting of small numbers of eastern grey kangaroos in sub-regions other than the Lower South East when needed – currently quotas are only set for eastern grey kangaroos in the Lower South East harvest sub-region, however, during the last 5 years, eastern grey kangaroos have been recorded in 5 additional harvest sub-regions. This plan will allow for the release of a small amount of special land management quota to be issued at DEW's discretion to enable the commercial utilisation of eastern grey kangaroos that would otherwise be culled under the non-commercial permit system.
5. Administrative changes to expand the Hills and Fleurieu harvest sub-region to include the Adelaide foothills and DEW managed parks and reserves in the expanded area. Some parks within the current harvest area and have an approved park management plan have already utilised commercial harvesting as part of their approved kangaroo management program. This expansion will allow for commercial harvesting in the peri-urban foothills around Adelaide and in DEW parks currently excluded from commercial harvesting. This change is being proposed as a result of correspondence received over the last 5 years from members of the public in the Adelaide Hills, in areas like Cherry Gardens, that are excluded from commercial harvesting but have property types identical to those already included in the commercial harvesting zone. The new boundary keeps the Adelaide CBD and surrounding suburbs excluded from the harvest area.

How we engaged

State consultation

The aim of the consultation period was to engage with a diverse range of stakeholders, seeking their input into the 5 key proposed changes to the Management Plan. The key platform for the consultation was the State Government website YourSAy, however, people were also invited to provide comments via email and letters.

The draft Management Plan was made available for consultation on YourSAy from 13 June to 15 September 2024, which met the legislative obligations of at least 3 months consultation period under section 60I of the NPW Act. The website consisted of an overview of the 5 key proposed changes, the draft Management Plan, a map of the proposed expanded harvest area and FAQs. A survey on the website asked participants to rate each of the 5 key proposed changes using a Likert scale, ranging from 'strongly disagree' to 'strongly agree', and were also able to add comments. They were able to complete the survey in full, or skip questions.

Key organisations were invited to either complete the survey or provide a written response to the consultation questions directly via email. There were several questions where the rating on the Likert scale did not match with the comments

provided, and these points are explained in this report where applicable. The Department for Environment and Water promoted the consultation through multiple channels, including social media, traditional media via a media release and email.

A total of 322 submissions were received during the consultation process, made up of 301 submissions via the YourSAy survey and 21 written submissions. Some groups ran campaigns encouraging members to submit responses by using or modifying prepared text with recommended submissions.

Australian Government consultation

The Australian Government conducted a 20-business day public consultation as per the requirements of the EPBC Act via the Australian Government's Wildlife Trade web page. Members of the public were able to provide feedback on the management plan between 16 October and 14 November 2024. One submission was made by the Australian Kangaroo Alliance during the consultation process. A summary of the feedback provided to the Australian Government, DEW response to feedback and changes made to the plan are provided in Appendix 2.

Engagement results

Who we heard from

Figure 1 shows the percentage of participants from the YourSAy survey that identified with each stakeholder group, noting that participants could select more than one category. The majority of respondents identified as having either animal welfare interests, 32% (n = 220) or conservation interests, 25% (n = 171). A large proportion of the participants that identified as having animal welfare and conservation interests appeared to be philosophically against the shooting of kangaroos based on the comments they provided. As stated on the YourSAy webpage, comments relating to the belief that kangaroos should not be shot (either commercially or non-commercially) are outside the scope of this consultation yet will be noted.

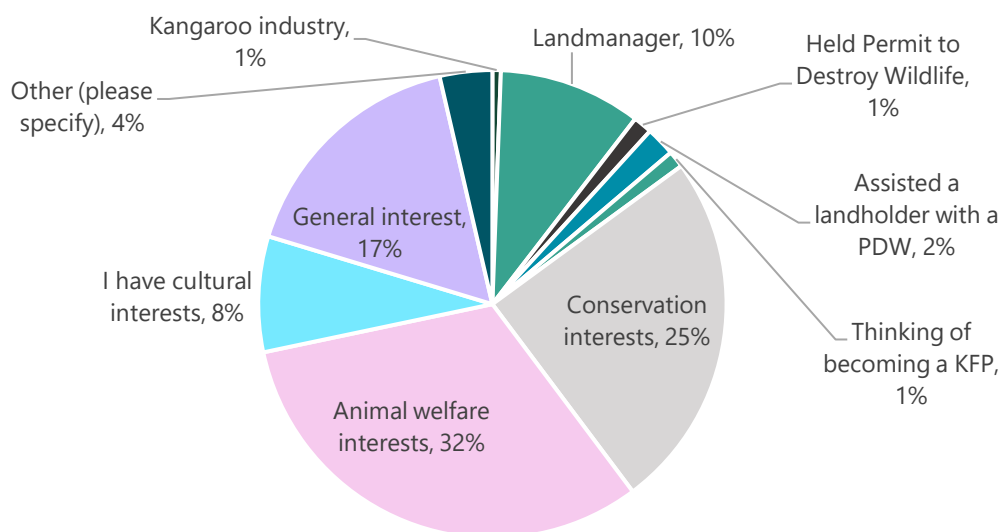


Figure 1. Percentage of participants that identified with each stakeholder group presented in question 1 of the YourSAy survey. Participants could select more than one group.

Participants were also asked if they were responding as an individual or as an organisation to the YourSAy survey. Most participants that responded were individuals (94%, n = 283), however 17 organisations also responded via the survey and an additional 13 organisations responded via written response.

Organisations that made submissions via the YourSAy survey or written response include:

- Animal Justice Party SA
- Animals Australia
- Australian Wild Game Industry Council
- City Of Victor Harbor
- Eyre Peninsula Landscape Board
- Family run Dairy Farm Enterprise in Lower South East
- Farmer
- Fauna Rescue SA Inc
- Friends of Parks Inc.
- Hancox Nursery
- Macro Group Australia
- Paringa View Park Dairy Farm , Adelaide Hills
- Road safety and repairs
- SA feral management services
- South Australian Professional Field Processors Organisation
- Southern Koala and Echidna Rescue
- Southern Koala and Echidna Rescue Ltd (SKER)
- Four Paws
- Green Adelaide
- Hills and Fleurieu Landscape Board
- Kangaroos Alive
- Livestock SA
- Murraylands and Riverlands Landscape Board
- Pastoral Board SA
- RSPCA SA
- SA Kangaroo Alliance
- Wildlife United SA (WUSA)

1. Prioritise conservation and animal welfare during emergency events

What we asked

We are proposing to prioritise conservation and welfare during emergency events, such as bushfires, by adjusting quotas or shutting down harvest sub-regions. To what extent do you agree or disagree with the proposal to adjust quotas or shut down harvest sub-regions during or as a result of an emergency event?

What we heard

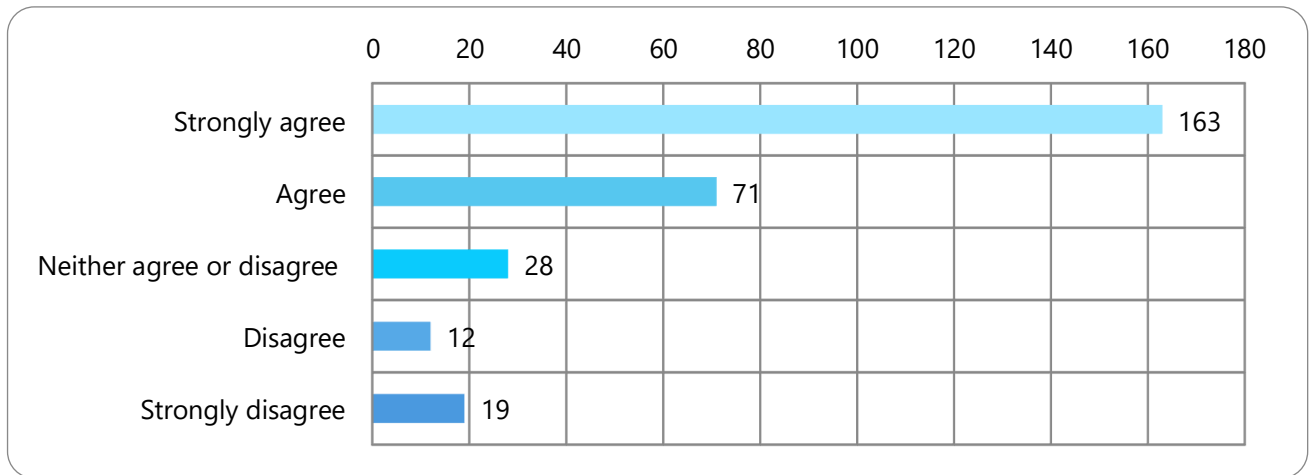


Figure 2: Number of participants that provided a response to question regarding emergency event management via the YourSAY survey.

Examples of what we heard

I strongly disagree with reducing kangaroo control after broadscale fires. When resource availability is low, kangaroo numbers should be kept commensurately low so they don't prevent recruitment of palatable vegetation. 'Emergency feeding' of overabundant macropods after fire or during droughts can be counterproductive to appropriate ecosystem management.

The intention behind this particular action is unclear. Whilst it may be intended to limit the further reduction of a population if the majority is removed during an emergency event, this is not clear from the current action described. Adjusting quotas or shutting down sub-regions from commercial harvest may be sending a perverse message, and in response to an emergency event it might be considered that commercial harvest should be allowed to assist in reducing the number of starving kangaroos resulting from the loss of vegetation (feed source).

Adjustment of quotas needs to be considered as potentially a decrease in some circumstances. In other circumstances it may require consideration of an increase in quotas.

Responsible thing to do socially.

Shutdowns should also be implemented anywhere if an emergency event is likely or predicted. To know that there is a risk of an emergency event, such as extreme fire danger, and to still allow commercial killing would be unethical and further endanger the safety of humans and animals.

There is extreme danger with kangaroos on roads. Nearly half of accident repairs in regional crash repairers come from kangaroos on roads. This is getting critical and cannot be controlled with methods in place. Please consider a much larger culling program.

Further consideration and changes made

Based on the feedback received additional information has been added to Action 14 (Emergency management response may require harvest sub-regions to be closed to commercial harvesting or quotas amended) to provide further guidance for decision making during emergency events and noting that kangaroo numbers may need to be managed post-emergency event (e.g. fire) as part of controlling total grazing pressure. When considering if quotas should be amended or areas closed to harvesting in response to an emergency event, DEW will consider the scale of the impacted area and the need for local land managers to maintain or increase kangaroo management in or adjacent to effected areas to assist in regeneration of native vegetation or agricultural land.

2. Introduce a more flexible, risk-based approach to kangaroo surveys

What we asked

We are proposing to introduce a more flexible, risk-based approach to kangaroo surveying so efforts can go into areas with high harvest. A risk analysis will consider things like the environment, harvest rate, weather and climate forecasting, and length of time since last survey, to determine where survey effort is needed. To what extent do you agree or disagree with the proposal to introduce a more flexible, risk-based approach to kangaroo surveying?

What we heard

50% of the participants stated that they either agreed or strongly agreed with the proposal to introduce a more flexible, risk-based approach to kangaroo surveys.

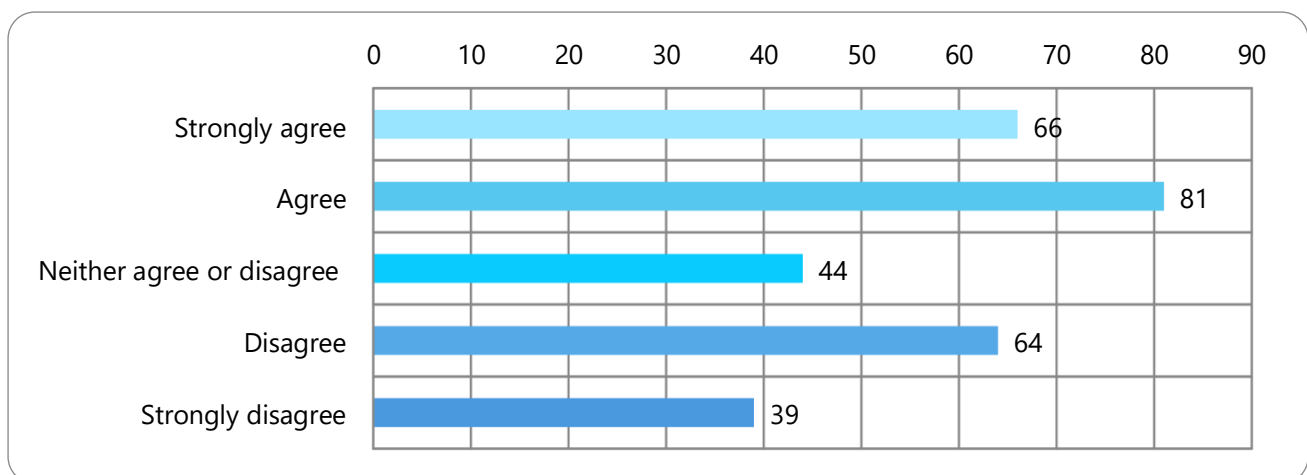


Figure 3: Number of participants that provided a response to question regarding flexible approach to surveys via the YourSAy survey.

Examples of what we heard

Over harvesting is an issue due to inaccurate and outdated data

Insufficient details provided about this “risk-based approach” to make a decision. No mention of population or growth or decline in the survey or how any of this data is being collected or how accurate the data will be.

Again, flexibility in laws like this are the most common sense approach.

You might want to state in the plan that Action 9 will enable DEW to focus survey efforts where the risk is highest so readers understand the rationale.

As a landowner, I am acutely aware of the impacts of dry/drought conditions on wildlife and feel that such conditions should also factor into this measure.

Further consideration and changes made

Additional information has been included in Action 9 (Surveys will be stopped in harvest sub-regions with a consistently low harvest for the previous 3 or more years and will start again once the harvest has reached the Low Harvest Threshold) to clarify that all sub-regions will undergo a risk assessment each year (Action 10), even those where survey efforts have stopped due to low harvest rates, and surveys will be conducted in these areas if determined necessary by the risk assessment.

3. Harvest quotas will be maintained for 3 years before being reduced to 10% of the population estimate

What we asked

Where the risk of over-harvesting is low, we are proposing to maintain harvest quotas for 3 years before reducing quotas to 10%. To what extent do you agree or disagree with the proposal to maintain consistent harvest quotas for 3 years before reducing to 10%?

What we heard

The proposal to maintain harvest quotas for 3 years was supported by 32% of participants. Although most of the participants were not supportive of the proposal, some were unsupportive because they believed quotas should remain high, rather than being reduced to 10%. Based on the comments they provided, most participants that were unsupportive of this change appeared to be philosophically against kangaroo management.

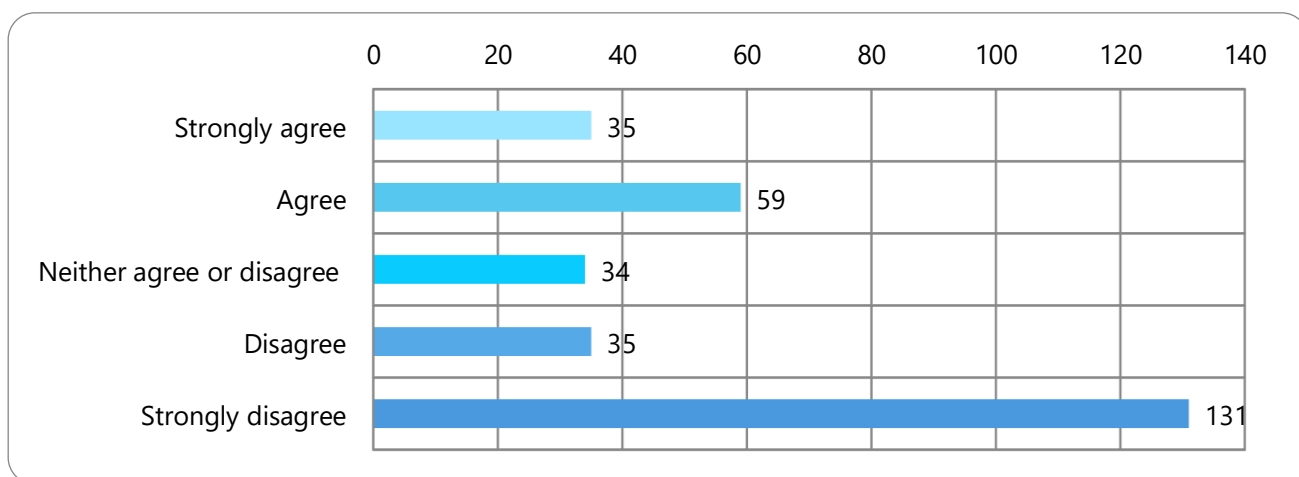


Figure 4: Number of participants that provided a response to question regarding maintaining harvest quotas via the YourSAy survey.

Examples of what we heard

Quotas must be abolished and slaughter of kangaroos legislated against.

The risk of over harvest is extremely low.

I do not agree with kangaroo culling. Kangaroos can manage their own population.

Doesn't go far enough to adequately adjust number to what they should be. The language choice needs to better reflect intent. A Quota infers a maximum allowance. If the word Quota was substituted with the Target the inference is stronger and suggests this is what we are aiming for. If the language can be modified I feel perception and behaviour will follow.

Harvest quotas should be maintained or adaptably increased when populations are high. 10% is likely not enough when native animal populations are absurdly overabundant. 10% is not a pro-active environmental solution designed to manage excessive populations of kangaroos.

Further consideration and changes made

Details were added to Action 11 (Sustainable Use commercial kangaroo harvest quotas are set annually for each harvest sub-region for each species) to provide examples of when quotas may be carried over and to provide reassurance that all sub-regions and quotas will be reviewed annually as part of the risk assessment (Action 10).

Added text "Quotas calculated from population estimates developed in previous years may be carried over at the original species-specific quota for up to 3 years, before being reduced to 10% of the population estimate. This situation may occur when harvest rates are below the Low Harvest Threshold (Action 9) or in sub-regions where no population model is available and quotas are derived directly from surveys are carried over (Action 10). Quotas will be reviewed annually for all sub-regions as part of the risk assessment conducted in Action 10, which includes assessing any significant changes in environmental conditions that are likely to have caused a large change in the population estimate since the last survey. In cases where a large change in population estimate is likely, a survey may be conducted before 3 years have passed.

4. Enable small numbers of eastern grey kangaroos to be harvested in areas in addition to the Lower South East harvest sub-region.

What we asked

We are proposing to allow small numbers of eastern grey kangaroos to be harvested in areas outside of the Lower South East harvest sub-region when needed – this change will allow kangaroos to be used commercially that would be otherwise be culled under the non-commercial system. To what extent do you agree or disagree with the proposal to enable the harvest of low numbers of eastern grey kangaroos in harvest sub-regions other than the Lower South East sub-region when needed?

What we heard

Based on the survey results, 40% of participants were supportive of the proposal to harvest a small number of eastern grey kangaroos outside of the Lower South East.

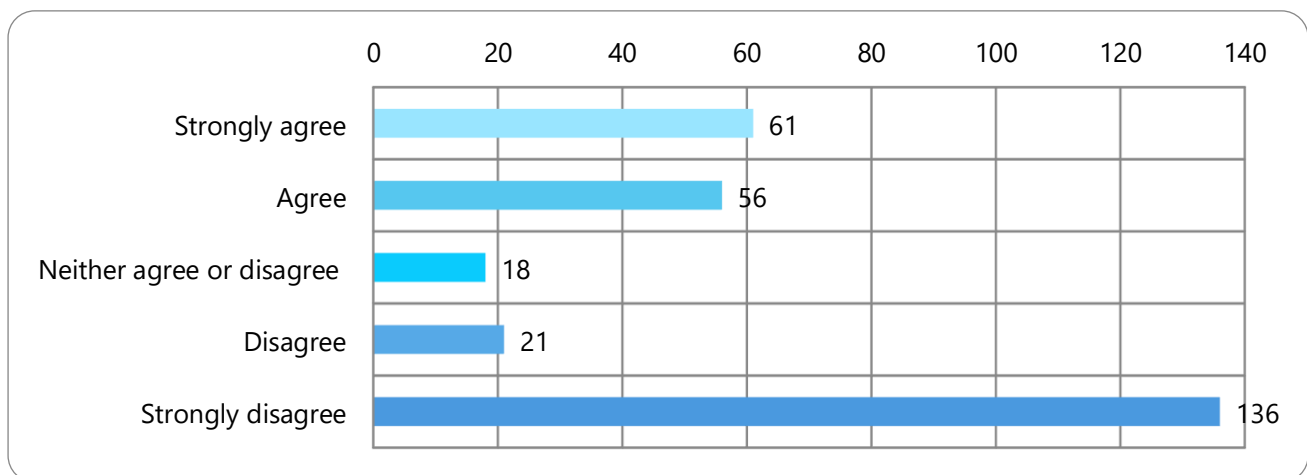


Figure 5: Number of participants that provided a response to question regarding harvesting a small number of eastern grey kangaroos outside of the Lower South East via the YourSAy survey.

Examples of what we heard

What constitutes "when needed"? Again is this a conservation claim or a need to meet demands of kangaroo products. Sounds like green washing to me.

I think the annual quotas should be increased by 15-20% immediately.
There are way more Roos out and about than you think there is.

The population needs to be brought under control and then there is no excuse for meat wastage. For too long nothing has been done, this needs to be rectified. Meat wastage has no place in the world today.

What does low numbers mean, in other words how many?

Further consideration and changes made

The number of eastern grey kangaroos that could be issued outside of the Lower South East will come from Special Land Management Quota (SLMQ) (Action 13), therefore the maximum number that could be issued is defined each year as SLMQ in the Quota Report. As an example, based on the 2024 Quota Report the maximum number that could have been issued during 2024 would have been 1,800. The number of eastern grey kangaroos issued outside of the Lower South East will be closely monitored and if there is large up-take of the available SLMQ additional survey work may be required to develop Sustainable Use quotas in other sub-regions. No changes have been made to the plan regarding eastern grey kangaroo quota being issued outside of the Lower South East.

5. Expand the Hills and Fleurieu harvest sub-region to include the Adelaide foothills, national parks and reserves.

What we asked

We are proposing to expand the Hills and Fleurieu harvest sub-region to include the Adelaide foothills and national parks and reserves to enable a more consistent kangaroo management approach. You can view a map of the proposed boundary online. To what extent do you agree or disagree with the proposal to extend the harvest sub-region to include the Adelaide foothills and national parks and reserves?

What we heard

Based on the survey results, 36% of participants were supportive of the proposal to expand the commercial harvest area to include the Adelaide foothills and DEW parks and reserves. Several written submissions were received that provided support of the expansion to provide land managers with another option to assist in managing kangaroos on their properties. Based on the comments provided most of the participants that did not support the proposal were against the management of kangaroos and particularly against kangaroo control in any DEW parks and reserves. Another concern raised was public safety regarding the use of firearms in parks.

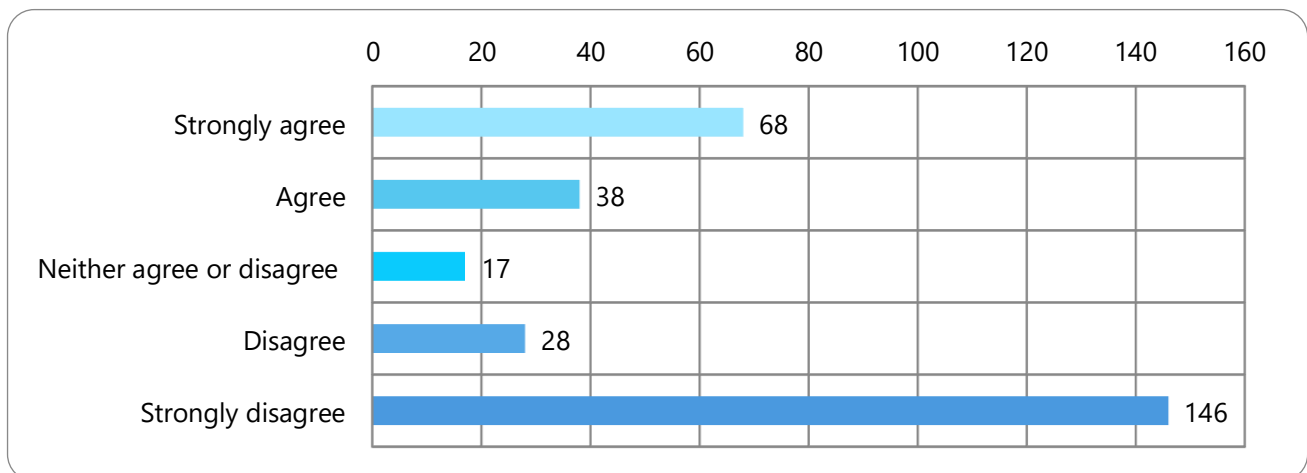


Figure 6: Number of participants that provided a response to question regarding expansion of the Hills and Fleurieu harvest subregion via the YourSAy survey.

Examples of what we heard

Culling kangaroos in controlled and strategic ways can help manage their population and reduce competition for resources, which can benefit other wildlife species and promote overall ecological balance. However, it's important that such measures are carefully planned and conducted to ensure they are humane and environmentally responsible.

All national parks and reserves should be managed without any commercial interests involved what so ever.

There are excessive populations of western greys in these areas.

I do not agree in the killing of our kangaroos for any reason other than to alleviate suffering.

I own a property in the Adelaide Hills. Attempts to restore protected Grey Box Grassy Woodland has been demonstrably hampered and in some instances negatively impact bio-diversity from over grazing by Kangaroos. This has a marked impact on ensuring a balance of habitat for the range of other native species.

Besides the fact I don't want to cull the kangaroos I am also concerned about the fact that the expanded areas are close to housing and more built up areas. I'm concerned that culling them in these areas with guns etc increases safety risks for residents.

Further consideration and changes made

The proposed boundary has been amended to exclude Cobbler Creek Conservation Park (Figure 7). All kangaroo management in parks must occur in accordance with the approved park management plan, which must allow for kangaroo control programs prior to a commercial option being considered. The proposal to expand the commercial harvest area does not automatically allow for commercial kangaroo management in park, but does allow for a commercial option to be considered. Parks that are within the current commercial harvest area and have an approved park management plan that allows for kangaroo control programs have been able to use the commercial kangaroo industry to assist with removing kangaroos prior to this new expansion of the harvest area.

DEW takes seriously the safety concerns raised by members of the public regarding use of firearms during kangaroo management activities. Any animal control programs must follow strict safety protocols and all use of firearms on park must occur in accordance with the Firearms Act administered by SA Police. During animal control programs DEW regularly closes parks to ensure that members of the public are not present in the area and these closures are listed on the DEW website

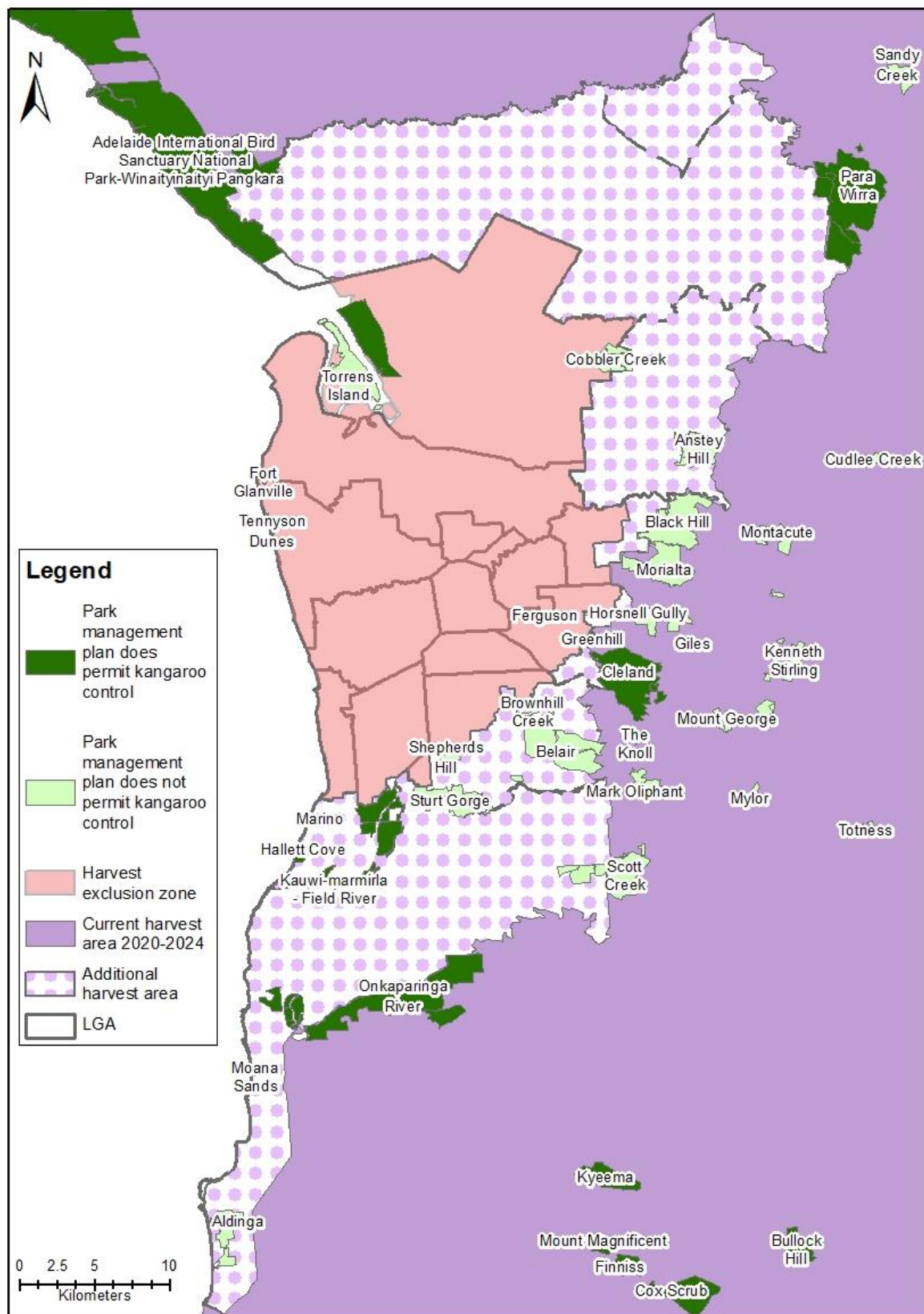


Figure 7: Expansion of the commercial harvest area after public consultation. The current harvest area (solid purple), additional harvest area (purple dots), harvest exclusion area (pink), Local Government Area boundaries (LGA) (grey line), parks that currently have approved park management plans that allows for kangaroo control (dark green) and parks that do not currently have an approved park management plans that allows for kangaroo control (light green).

6. Balance between conservation and commercial kangaroo management

What we asked

One of the final questions participants were asked to consider was if the plan got the right balance between conservation and commercial kangaroo management.

What we heard

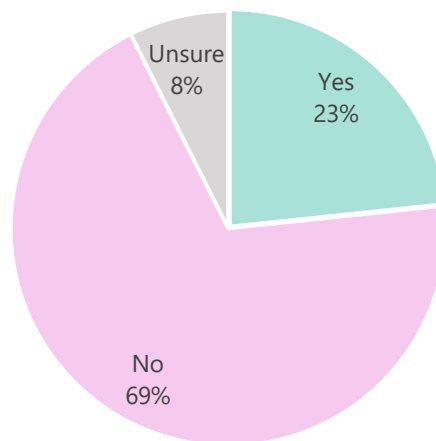


Figure 8: Percentage of participants answered yes (n = 63), no (n=187) and unsure (n = 20) to the question do you believe that the plan gets the right balance between conservation and commercial kangaroo management?

Examples of what we heard

It's pretty obvious that kangaroos are not being managed. They are out of control.

Kangaroos don't need conservation; their population is in no way in any threat.

Not at all. Just another example of humans meddling in natural systems and justifying the mass slaughter of sentient animals to serve economic benefits only.

The way counts are conducted and the deviation (correction factors applied) create meaningless population estimates that defy mortality risks and biological reproduction capabilities of macropods.

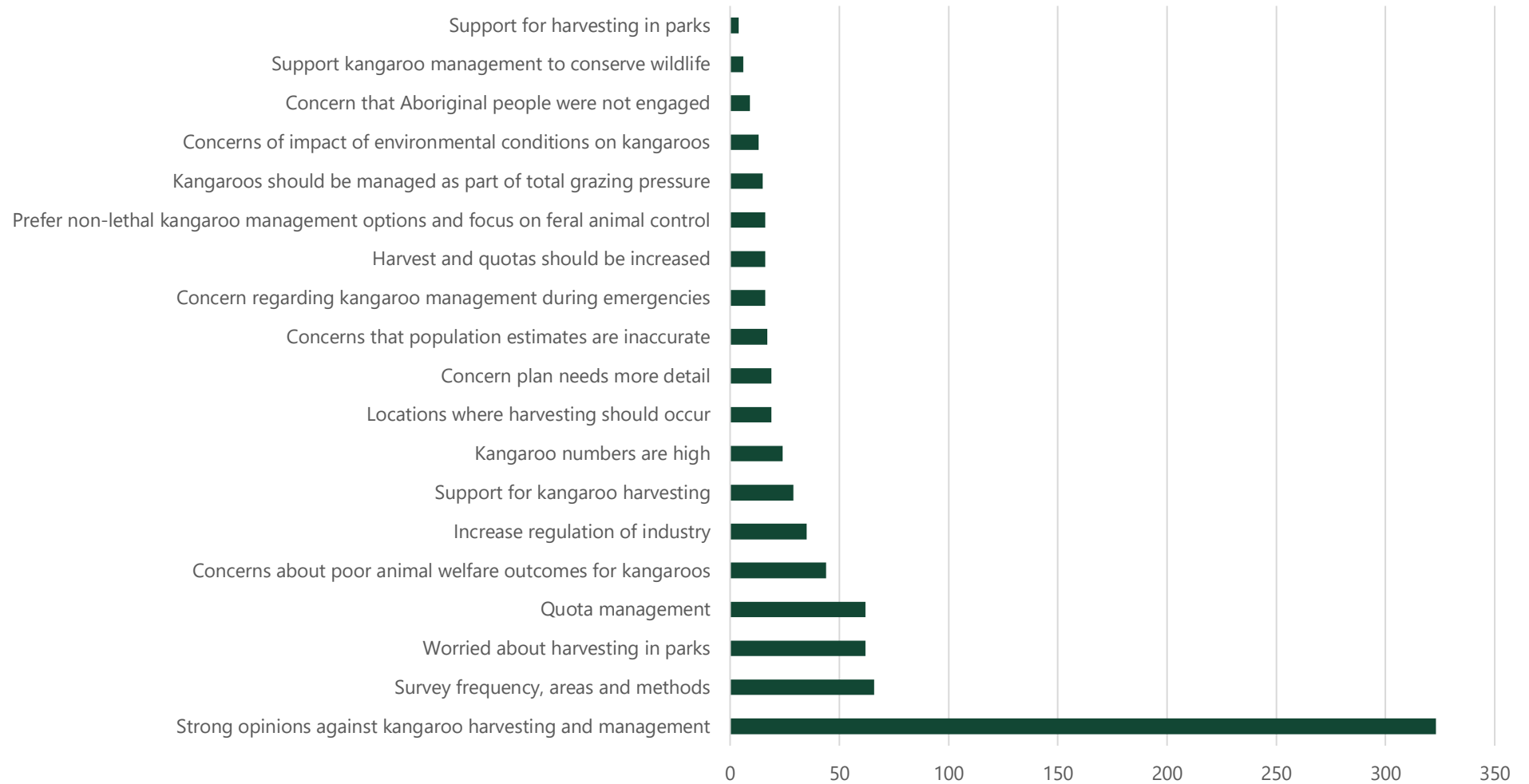
Yes, It allows for the culling of Kangaroos to become more sustainable and allow them for commercial use when they would end up going to waste. The commercial use allows previously wasted kangaroos to be used for meat, skin and bones.

Further consideration and changes made

Other amendments to the plan based on feedback include:

- Minor amendment to make harvesting area map to make it more readable.
- Include the term 'humane management' in goal rather than 'humane use'.
- Performance indicator 7.1– reworded performance indicator to be clearer from an auditing perspective.
- Aim 4 – inclusion of statement that even after harvesting low numbers of kangaroos, kangaroos may still negatively impact biodiversity.
- Appendix 2: Inclusion that droughts also negatively affect the welfare of kangaroos themselves.

Overview of YourSay comments



Appendices

Appendix 1: Engagement methodology

YourSAy Survey

Draft South Australian Commercial Kangaroo Management Plan 2025 - 2029 - Consultation Survey

Thank you for taking the time to complete this survey. Your feedback will help guide the development of the Commercial Kangaroo Management Plan 2025–2029. You will be asked about the changes proposed in the draft plan and the extent to which you support them. You will be able to provide additional comments to support your answers. The survey should take between 10 - 20 minutes to complete depending on the amount of feedback you wish to provide. You can skip questions you do not wish to comment on. We recommend you read the draft management plan before or while completing the survey. We appreciate the variety of views that will be brought to this consultation.

1. What is your name?
2. How would you best describe yourself?
 - a. An individual
 - b. Responding on behalf of an organisation
3. Which of the following describes your interest in kangaroo management (select all that apply)
 - I operate a business in the kangaroo industry (Meat Processing, Field Processing, Skin Tannery)
 - I am a landholder or land manager
 - I hold or have previously held a Permit to Destroy Wildlife (Kangaroos)
 - I have assisted a land holder with a current Permit to Destroy Wildlife (Kangaroos) with kangaroo management
 - I am thinking of becoming a kangaroo field processor
 - I have conservation interests
 - I have animal welfare interests
 - I have cultural interests
 - I have a general interest in kangaroo management
 - Other (please specify)
4. Do you consent for your response to be publicly shared?

Proposed changes

The following questions will ask about your level of support for each proposed change to the SA Commercial Kangaroo Management Plan. You can find out more about each change by reading our frequently asked questions and the draft management plan.

5. We are proposing to prioritise conservation and welfare during emergency events, such as bushfires, by adjusting quotas or shutting down harvest sub-regions. To what extent do you agree or disagree with the proposal to adjust quotas or shut down harvest sub-regions during or as a result of an emergency event? (Choose any one option)
 - a. Strongly agree
 - b. Agree
 - c. Neither agree or disagree
 - d. Disagree
 - e. Strongly disagree
6. Do you have any other comments you would like to provide?

7. We are proposing to introduce a more flexible, risk-based approach to kangaroo surveying so efforts can go into areas with high harvest. A risk analysis will consider things like the environment, harvest rate, weather and climate forecasting, and length of time since last survey, to determine where survey effort is needed. To what extent do you agree or disagree with the proposal to introduce a more flexible, risk-based approach to kangaroo surveying?
 - a. Strongly agree
 - b. Agree
 - c. Neither agree or disagree
 - d. Disagree
 - e. Strongly disagree
8. Do you have any other comments you would like to provide?
9. Where the risk of over-harvesting is low, we are proposing to maintain harvest quotas for 3 years before reducing quotas to 10%. To what extent do you agree or disagree with the proposal to maintain consistent harvest quotas for 3 years before reducing to 10%?
 - a. Strongly agree
 - b. Agree
 - c. Neither agree or disagree
 - d. Disagree
 - e. Strongly disagree
10. Do you have any other comments you would like to provide?
11. We are proposing to allow small numbers of eastern grey kangaroos to be harvested in areas outside of the Lower South East harvest sub-region when needed – this change will allow kangaroos to be used commercially that would be otherwise be culled under the non-commercial system. To what extent do you agree or disagree with the proposal to enable the harvest of low numbers of eastern grey kangaroos in harvest sub-regions other than the Lower South East sub-region when needed?
 - a. Strongly agree
 - b. Agree
 - c. Neither agree or disagree
 - d. Disagree
 - e. Strongly disagree
12. Do you have any other comments you would like to provide?
13. We are proposing to expand the Hills and Fleurieu harvest sub-region to include the Adelaide foothills and national parks and reserves to enable more consistent kangaroo management. You can view a map of the proposed boundary [here](#). To what extent do you agree or disagree with the proposal to extend the harvest sub-region to include the Adelaide foothills and national parks and reserves?
 - a. Strongly agree
 - b. Agree
 - c. Neither agree or disagree
 - d. Disagree
 - e. Strongly disagree
14. Do you have any other comments you would like to provide?
15. Do you believe that the draft plan gets the balance right between conservation and commercial kangaroo management?
16. Are there any other comments you would like to make about the South Australian Commercial Kangaroo Management Plan?

Appendix 2: Australian Government Consultation Results

Summary of Feedback from Australian Kangaroo Alliance	DEW Response	Change to Plan
Plan does not comply with Convention for Biological Diversity (as per section 303BA of the EPBC Act) or Ecologically Sustainable Development (ESD)	The Biological Convention establishes three main goals: the conservation of biological diversity, the sustainable use of its components, and the fair and equitable sharing of the benefits from the use of genetic resources. The plan sets out how DEW will ensure a sustainable harvest of the harvested kangaroo species which meets the requirements of the Biological Conservation and Ecologically Sustainable Development.	No change
Should not allow commercial harvesting in parks as these are refuges for kangaroos. Kangaroos provide positive impact to soils and biomass production. Plan should remove all parks from commercial harvesting.	The expansion to the commercial harvest zone does include additional parks, however, kangaroo control programs are only allowed in parks where an approved park management plan is in place and kangaroos are causing damage to conservation values of the park. This expansion provides the option for commercial harvest in areas where the option to remove kangaroos non-commercially already exists.	No change
SA Government significantly subsidises the commercial kangaroo industry	Noted. Out of scope.	No change
Plan does not include non-native species as contributors to grazing pressure or non-lethal management options.	Plan mentions that other species also contribute to grazing pressure in the introduction, however the purpose of this plan is to allow for the sustainable harvest of the 5 macropod species mentioned in this plan. Specific comments about other herbivores or non-lethal kangaroo management options are out of scope.	No change

Kangaroo numbers are not overabundant	Large body of evidence to state that the common kangaroo species are in greater numbers than previously. Out of scope.	No change
Artificial watering points do not cause increase in kangaroo numbers	Out of scope.	No change
Biologically impossible increases in kangaroo numbers	Population estimates capture migration as well as reproduction of kangaroo populations. Out of scope.	No change
Kangaroos do not compete with livestock for feed	Out of scope.	No change
Plan does not provide evidence of significant damage to fences/ infrastructure/ crop damage cause by kangaroos.	Plan sets sustainable harvest quotas based on population estimates, not the amount of damage caused by kangaroos. Out of scope.	No change
Inaccurate population estimates from surveys. Use of correction factors to inflate kangaroo numbers.	Aerial observers do not see all kangaroos that are present when they fly over, correction factors are a common method used to correct the data to account for the kangaroos missed. Out of scope.	No change
kangaroo growth rates lower than sustainable quotas set, should be 10% for greys and 14% for reds.	Current sustainable quota percentages are based on published literature. Out of scope.	No change
Reference to NSW inquiry and concerns raised of NSW's kangaroo program.	Out of scope, related to NSW kangaroo management program not SA's.	No change
Lack of transparency regarding low population thresholds, number of dependent young destroyed, omission of total number of permit holders, reports provided too long after end of year, no reporting of cost of industry (viability of industry, cost to tax payers, contribution to economy).	Low population thresholds are included on graphs in Quota Report for red kangaroos and western grey kangaroos. DEW does not require the reporting of dependent young destroyed by the industry. The number of permit holders are recorded in the annual Harvest Report. Reports are developed as soon as possible. Costs associated with the industry are out of scope for this plan.	No change

Plan does not comply with EPBC Act.	Plan does comply with EPBC Act requirements as per Part 13A, section 303BA and section 303FO. It provides an assessment of the threats posed to the harvested kangaroo species. Sustainable harvest quotas are set that do not allow for the 'large scale removal' of kangaroos. Harvest quotas are based on a proportion of the population estimate at percentages shown to be sustainable by published literature. Monitors the environment and population estimates and adjust quotas accordingly.	No change
Impact assessment of threats to kangaroos - assessment falls short of detailing enviro considerations of removal large proportion of the kangaroo population.	Sustainable harvest rates of 10-20% of the kangaroo population are set each year, however, only 15-20% of the quota is used each year, which equates ~100,000 kangaroo each year. This is equivalent to 2-5% of the population in any given year.	Inclusion of bushfires and illegal take of kangaroos in Appendix 2, Threats to kangaroos.
Assessment of threat to kangaroos - not updated since 2012, omits recent scientific evidence e.g. Threat of climate change, drought, and climate related mortality events.	Climate change and drought are listed as threats to kangaroos, literature is reviewed each year to add references.	No change
Assessment of enviro impacts of kangaroo industry - minimises impact on habitats and ecosystems, limiting impact caused by shooters vehicles and offcuts. No mention of lead bullets used across landscape.	Impact of kangaroo field processor vehicles and offcuts in the environment are minimal.	Additional information provided relating to driving behaviour and impact of offcuts in the environment to provide further clarity.

Failure to assess cost of extraction of large number of kangaroos from environment - removal of ecosystem services kangaroos provide, e.g. Maintaining soil health, distributing seeds across landscape.	Sustainable harvest rates of 10-20% of the kangaroo population are set each year, however, only 15-20% of the quota is used each year, which equates ~100,000 kangaroo each year. This is equivalent to 2-5% of the population in any given year. There are still large numbers of kangaroos in the environment that can provide ecosystem services. Out of scope.	No change
Lack of research by governments on value kangaroos provide to the ecosystem. Instead focusing on research promoting kangaroos as overabundant.	Out of scope.	No change
Plan fails to acknowledge the significant ecological, economic and social uncertainties of constant extraction of kangaroos, questions SA Gov ability to manage risks and engage in precautionary management actions	Sustainable harvest rates of 10-20% of the kangaroo population are set each year, however, only 15-20% of the quota is used each year, which equates ~100,000 kangaroo each year. This is equivalent to 2-5% of the population in any given year.	No change
SA Gov fails to provide confidence to public in protecting animal welfare and population sustainability. Lack of transparency regarding KMRG (members, minutes, agendas ect.), critical issues and cost/ benefit analysis of industry (reasonable use of public funds).	Cost of industry regulation out of scope for plan. Minutes, agendas and names of members of KMRG are not shared to allow for open/honest conversations within the group.	No change
No evidence that SA Gov acts in the public's best interest or comply with basic requirements of good governance (incl public participation, transparency and accountability), this is done to protect social licence to operate.	Public participation - Public comment on development of new Management Plan is welcome with the plan made available for public comment at State and Commonwealth level. Transparency/Accountability - Annual harvest and quota reports made publicly available which includes reporting on departments conducting of regulatory activities and outcomes.	No change

Lack of opportunities for public participation in policy decisions in kangaroo management	Opportunity is provided for public comment at the state and commonwealth level, as part of the process for reviewing/updating of the plan every 5 years. Out of scope.	No change
Lack of community participation in the review of previous kangaroo mgt plan.	The previous kangaroo management plan did not require public participation in the review of the plan. Community participation has been sort and is required in the development of the new plan every 5 years.	No change
Plan does not 'promote humane treatment of wildlife' as National Code of Practice legitimises slaughter methods that would breach SA animal welfare laws, particularly in relation to dependent young. National Code of Practice developed by kangaroo industry - concerns regarding 2020 National Code of Practice.	National Code of Practice was recently reviewed via a committee of representatives from Australian, state and territory government authorities responsible for kangaroo management, the kangaroo and pastoral industries, the Australian Veterinary Association, RSPCA Australia and AgriFutures Australia. The Code is jointly approved by the Commonwealth Minister for the Environment and the Minister for Agriculture, Drought and Emergency Management. Out of scope.	No change
Lack of training in killing methods, lack of oversight from Gov.	DEW requires that all applicants for a kangaroo field processor permit successfully complete both an approved firearms proficiency course and the Wild Game Harvester Field Processing accreditation, in SA these courses are conducted by TAFE SA.	No change
Lack of compliance re: breaches of COP and other legislation. No inspections at point of kill.	DEW has a zero tolerance approach to breaches of the Code of Practice and compliance action are reported in the Harvest Report. No inspections are carried out at the point of kill due to occupational health and safety considerations to DEW staff.	No change

Lack of transparency on compliance activities, incl total number of permit holders, number of DEW employees tasked with compliance and enforcement of industry.	Compliance actions are detailed in the annual Harvest Report each year and include the number of permit holders, the number of chillers inspected, the number of meat processing works inspected, the number of audits completed and compliance action taken against breaches of Code of Practice and other legislation.	No change
SA Gov did not stop commercial harvesting on KI after bushfires in 2019/20.	Harvesting was only allowed on Kangaroo Island from 1 January 2020, however, commercial harvesting was prohibited in January 2020 and the island remained closed to commercial harvesting until January 2021. When it was re-opened after additional survey effort, reduced quotas were set for both Tammar wallaby and western grey kangaroo on the island.	No change
Understaffing of kangaroo management program. Same staff have responsibility of PDW compliance.	Noted. Out of scope.	No change

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