Feedback report

South Australian Commercial Kangaroo Management Plan 2020-2024

Government of South Australia

Department for Environment and Water

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Project Background

The South Australian Department for Environment and Water (DEW) manages kangaroo populations and the commercial harvest under the *South Australian Commercial Kangaroo Management Plan 2018-2022* which was adopted in 2018 under section 60I of the *National Parks and Wildlife Act 1972* (NPW Act). The kangaroo species allowed to be harvested are the red kangaroo, western grey kangaroo and the euro. In South Australia, this plan also acts as the approved *Wildlife Trade Management Plan* under the *Environment Protection and Biodiversity Conservation Act 1999* (EBPC Act), approved by the Commonwealth Minister for the Environment, which allows for the export of kangaroo products from Australia. A Wildlife Trade Management Plan may be in place for up to five years.

Kangaroo harvesting in South Australia has been regulated under the NPW Act for nearly 40 years with no negative impact to the long-term conservation of populations. The commercial harvest currently occurs across much of the state's pastoral area, Eyre Peninsula, mid-North and Murray Mallee.

Following a series of good seasons, kangaroo numbers increased to an estimated record high of 5.4 million in 2017 within the commercial harvest zone. While drying conditions have resulted in a natural decline of kangaroo numbers in the north of South Australia, populations remain high across much of the southern part of the state and this has been consistent over the last ten years. South Australia's kangaroo overabundance and renewed calls from primary producers and the commercial kangaroo industry have prompted a review of the commercial kangaroo harvest, specifically where it can occur and which species can be harvested.

The changes that were proposed included:

- Expansion of the commercial kangaroo harvesting zone to cover Yorke Peninsula, Adelaide Hills, Fleurieu Peninsula, Kangaroo Island and the South East
- Increase in the number of species available for harvest to include the Tammar Wallaby (*Macropus eugenii*), Eastern Grey Kangaroo (*Macropus giganteus*), Red-necked Wallaby (*Macropus rufogriseus*) and Kangaroo Island sub-species of Western Grey Kangaroo (*Macropus fuliginosus fuliginosus*).
- Changes to kangaroo survey frequency and the way harvest quotas are calculated.

The commercial kangaroo harvest is an additional management tool to assist land managers in managing total grazing pressures and will enable kangaroos to be used for meat or skin production rather than being left on the ground.

To enact these changes, amendments were required to the *South Australian Commercial Kangaroo Management Plan 2018-2022* and the *National Parks and Wildlife (Kangaroo Harvesting) Regulations 2018*.

Introduction

The draft *South Australian Commercial Kangaroo Management Plan 2020-2024* (the plan) will replace the *South Australian Kangaroo Management Plan 2018-2022*. The overarching goal of the plan is to maintain viable populations of the harvested kangaroo species throughout their ranges in accordance with the principles of humane, ecologically sustainable development. The plan outlines how DEW will achieve this goal through the following seven aims;

1. Ensure humane treatment of kangaroos
2. Promote community awareness and participation
3. Manage impacts of kangaroos on land condition
4. Monitor kangaroo populations
5. Monitor industry compliance
6. Facilitate adaptive management and research
7. 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, particularly those in the proposed new harvest areas of South Australia, regarding the proposal to expand the harvest area and include additional kangaroo species. Under section 60I of the NPW Act, the plan is required to be released for public consultation for at least three months before the South Australian Minister for Environment and Water may endorse the plan.

The main portal for consultation was the South Australian Government YourSAy website. The draft plan was available for comment for three months from 6 June to 6 September 2019. However, before the plan was released for consultation, preliminary consultation, through a series of face-to-face meetings, was conducted with key stakeholders in the proposed new harvest areas from December 2018 to June 2019. This approach was taken to ensure that key stakeholders were engaged and aware of the proposal prior to the release of the plan.

The plan also meets the requirements as a Wildlife Trade Management Plan. In order to achieve that, it must undergo separate public consultation (as per the EPBC Act) run by the Commonwealth Department of the Environment and Energy for 20 business days. The results of this consultation are also included in this report as is required to finalise the plan.

Methods

The aim of the consultation period was to engage with a diverse range of stakeholders and allow them to have input into proposed changes to the plan. A range of engagement methods were used including face-to-face meetings, presentations to groups (e.g. district councils and Natural Resource Management (NRM) Boards), letters and emails announcing the consultation period for the plan, phone conversations; and a survey, comment section and discussion page through the YourSAy webpage. Table 1 provides an overview of who was engaged, by what means and when the engagement occurred.

Table 1 Description of the engagement techniques used, stakeholders consulted and the date that the consultation took place during the consultation phase of the management plan.

Techniques used	Stakeholders	Dates
Preliminary consultation: Face-to-face meetings – DEW staff travelled to meet with stakeholders Phone conversations	South Australian Members of Parliament Commonwealth Government – Wildlife Trade Division Local Governments PIRSA Conservation non-government organisations (NGOs) Livestock SA RSPCA-SA Interstate governments – Kangaroo harvesting programs Key stakeholders in proposed new harvest areas	December 2018 - June 2019
SA Government Gazette Notice – Announcing release of draft plan (Requirement of NPW Act)	All	Thursday 6 June 2019
Newspaper advertisement (*The Advertiser*) - Announcing release of draft plan (Requirement of NPW Act)	Diverse range of stakeholders	Friday 7 June 2019
Minute to SA Minister for Primary Industries and Regional Development (Requirement of NPW Act)	Minister for Primary Industries and Regional Development	June 2019
Letters- announcing release of draft plan	South Australian Members of Parliament • Member for Finniss • Member for Frome • Member for Waite • Member for Narungga • Member for Light • Member for Flinders • Member for Stuart • Member for Chaffey • Member for Mount Gambier • Member for Mackillop Local Government Association The University of Adelaide PIRSA Conservation Council SA Livestock SA RSPCA-SA Pastoral Board of SA NRM Boards	June 2019
Email - announcing release of draft plan	Commercial kangaroo industry (all permit holders) Interstate governments – Kangaroo harvesting programs Key stakeholders in proposed new harvest areas including: • Local governments • Aboriginal groups • Primary producer organisations • Conservation organisations • NRM groups • Sporting Shooters Association of Australia • SA Museum	June 2019

Techniques used	Stakeholders	Dates
Face-to-face meetings	SA Arid Lands NRM Board (Port Augusta) District Council of Grant (Mount Gambier) Narungga Nations (Northern and Yorke) World's end Conservation Group (Northern and Yorke)	June – September 2019
Hard copies of the plan available on request	Hard copies were sent to three members of the public in the following areas: • Cambrai • Craigmore • Port Augusta.	June – September 2019
YourSAy Survey, comment sections and discussion page were used	Broad range of stakeholders including 107,060 registered YourSAy users. 45,473 people opened the email.	June – September 2019
Kangaroo Management Program email inbox	Stakeholders were invited to send comments via email rather than YourSAy if preferred.	June – September 2019
Email – reminder that two weeks remained of consultation	All stakeholders previously contacted	August 2019
Electronic-*Across the Outback* Article	All subscribers to the *Across the Outback* publication and land managers within the SA Arid Land region. Other interested people can access *Across the Outback* on the SA Arid Lands NRM website under the news and resources tab, publications.	July 2019
DEW internal consultation: *The Weekly* article to advertise release of plan (DEW internal staff newsletter) DEW staff invited to use template on DEW intranet to provide feedback on plan	All DEW staff	12 June 2019
Commonwealth consultation: Commonwealth Department of the Environment and Energy web site – comments mailed or emailed to the Wildlife Trade Division	Broad range of stakeholders	19 September – 22 October 2019

Assessment criteria

Submissions received during the consultation process were examined based on the criteria detailed below to determine if the comment(s) would influence the draft management plan.

The draft management plan was changed if a submission:
(a) provided additional information of direct relevance to management;
(b) indicated or clarified a change in Government legislation, management commitment or management policy;
(c) proposed strategies that would better achieve or assist with management objectives;
(d) prompted a re-consideration of the objective and/or strategy and results in an alternative objective and/or strategy for kangaroo management or the kangaroo industry;
(e) was an alternate viewpoint received on the topic and is considered a better option than that proposed in the draft plan; or
(f) indicated omissions, inaccuracies or a lack of clarity.

The draft management plan was not changed if a submission:
(a) addressed issues beyond the scope of the plan;
(b) was already in the plan or was considered during the development of a subordinate plan;
(c) offered an open statement, or no change was sought;

(d) clearly supported the draft proposals;
(e) was an alternate viewpoint received on the topic but the proposal of the draft plan was deemed to be the best option.
(f) was based on incorrect information;
(g) contributed options that are not possible or inconsistent with overarching legislation, Government policy or management direction; or
(h) involved details that were not appropriate or necessary for inclusion in a document aimed at providing management direction over the long term.

Engagement results

Summary of feedback – SA consultation

Table 2: Summary of feedback received from the 531 submissions made through YourSAy or emailed to the kangaroo management program. A summary of all responses are provided in Appendix 2 of this report. Survey questions are listed under 'we asked', a sub-set of responses showing the main themes for each question are presented under 'you said' and the actions taken based on the comments received are described under 'we did'.

We asked	You said	We did
Do you agree or disagree with the inclusion of the following regions in the commercial harvest? • Adelaide Hills and Fleurieu Peninsula, • Kangaroo Island • Upper South East, • Lower South East, • Murray Plains, • Yorke Peninsula and Lower North	"I think kangaroos should be protected, not killed" "Kangaroo populations in the areas highlighted are too high. They damage property and need to be reduced" "Expanding the zone will not solve the ongoing problem of affordable commercial harvesting…" "Great idea" "It seems a good idea to ensure appropriate use of resource which is otherwise wasted." "These native emblems are more than just a bullet. How many kangaroo lives will actually be lost?" "Kingston Council area is normally considered within "The Lower South East," particularly in fire danger areas and Local Government boundaries, and will create some confusion in community." "Suggest considering if the new Parks Boundaries could be used instead"	Consideration was given to changing the boundaries of the harvest sub-regions, but the original proposed boundaries were retained for ease of administration – boundaries align with local government areas where possible and all established commercial harvest boundaries are based on Soil Conservation Board Boundaries. Although these boundaries are no longer used for natural resource management, they have been used by the commercial harvest since its inception in 1975 and both industry and landholders are familiar with the boundaries. These boundaries also have the advantage of being based on soil and therefore vegetation structures which are linked to preferred habitat types for kangaroo species.
To what extent do you agree or disagree with the addition of the following species in the commercial harvest? • Eastern Grey Kangaroo • Western Grey Kangaroo (Kangaroo Island sub-species) • Red-necked Wallaby • Tammar Wallaby (excluding mainland population)	"Including overabundant species (e.g. tammar wallabies on Kangaroo Island) is a good conservation move." "Will tammar wallabies be culled on mainland?" "Introducing more kangaroos for killing is ridiculous" "Red-necked wallaby is a rare species and should be exempt." "…does not support the inclusion of Red-necked wallabies due to the lack	Red-necked wallaby was removed from the proposal and will not be included in the commercial harvest. No tammar wallabies will be culled from the reintroduced mainland population. Clarity was added by including "**tammar wallaby (*M. eugenii*) on Kangaroo Island and other islands**" under the definition of "Kangaroo" page iv.

We asked	You said	We did
	of baseline data and evidence that there is an issue of overabundance" "I am not sure about the status of the wallaby species and the K I Kangaroo but we strongly support commercial harvesting of the Eastern Grey Kangaroo in the Adelaide hills" "There is no need for commercial purposes to kill more species."	More information was included in the introduction to explain that the species proposed for commercial harvest are impact causing species. "**All kangaroo species included in this plan are common and causing significant impacts, as such, DEW regularly issues Permits to Destroy Wildlife for these species**." page 1.
To what extent do you agree or disagree with the survey frequency and method to obtain population estimates for kangaroos?	"In new areas there needs to be annual surveys for at least five years to establish a more accurate data base to work from." "I would prefer that the survey be done every year." "I believe your methods for determining population levels are inherently flawed and skewed towards assisting the commercial markets" "I don't agree at all with any of this. This abuse of animals needs to stop." "We strongly support sustainable harvesting." "More information needs to be provided on how this will be carried out to ensure accuracy." "We are concerned about proposed increases to the periods between surveys of harvest regions and the robustness of extrapolation of results across large areas. We therefore suggest: the Plan should contain more detail about proposed survey methodology, particularly for new species and new regions; that annual surveys should be undertaken in new harvest regions for at least 3 years, and further detail should be provided about how results will be extrapolated across different harvest regions."	More detail was provided in survey method section regarding who will do surveys, how the surveys will be conducted and how the population model will be used under Action 9 (page 13- 14) An additional table outlining how quotas and thresholds will be managed was included as Appendix 4 to provide clarity. More detail was provided in how the risk assessment prior to annual survey period will be used to reduce the risk of overharvesting. Risk assessment was changed from a performance indicator 9.3 to an action. A new Action 10 was created on page 14.
To what extent do you agree or disagree with the use of the Low Harvest Threshold?	"Low Harvest Threshold is only a commercial indication. The reduction of harvest is also due to lack of field processors, poor remuneration, constraints of set up costs. It does not necessarily show kangaroo numbers, indeed it could be quite the opposite." "I consider a survey would still be required to ensure over harvesting does not occur." "More cost-effective survey system."	More detail was provided in how the risk assessment prior to annual survey period will be used to reduce the risk of overharvesting. Risk assessment was changed from a performance indicator 9.3 to an action. A new Action 10 was created on page 14 "***Action 10: A risk-based approach is used for determining which Commercial Harvest Sub-regions (CHSRs) are surveyed each year".***

We asked	You said	We did
	"Again I don't think any kangaroos should be killed"	
To what extent do you agree or disagree with increasing harvest quotas when kangaroo populations are high?	"In our experience, the quotas for Harvesting are far lower than the observed populations. We renew our Permit to Destroy regularly as can easily shoot our entire quota in one evening" "This makes sense as we have seen the impact of over population during this drought." "Kangaroo populations respond to climate conditions. With the pressure of climate change, populations are set to decline. Kangaroos are slow breeders so there is no fear of population explosions." "Better than them starving and being on the roads." "This whole premise is flawed. We need to be given access to correct data in order to make good judgements"	More clarity provided in how the high abundance quota will be set as **Appendix 4**.
Do you think the draft plan gets the balance right between conservation and commercial kangaroo management?	"No harvesting at all" "the roos are causing environmental damage at the present time" "may be still a little conservative (as in, being overly-careful about the number of roos to be harvested)" "Pretty close" "There should be zero commercial "harvesting" of any native animal. They have as much right to live here as we do."	Comments received were statements, therefore no changes were made.

Demographics of respondents

Respondents were asked "which of the following best describes your interest in kangaroo management (more than one may be selected)?"

- I operate a business in the kangaroo industry
- I am a landholder or land manager
- I hold or previously held a Permit to Destroy Wildlife (Kangaroos)
- I have assisted a land holder with a current Permit to Destroy Wildlife (Kangaroos)
- 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

Figure 1 shows the percentage of respondents that identified with each stakeholder group detailed in question 1 of the YourSAy survey. The majority of respondents identified as having either animal welfare interests or conservation interests, 73% (n = 349) and 62% (n = 300), respectively. 31% (n = 148) of respondents identified has having cultural interest and 29% (n = 138) identified as landholders. Only 1.5% (n = 7) of respondents identified as belonging to the kangaroo industry, but 2% (n = 9) stated they were interested in becoming a kangaroo field processor.

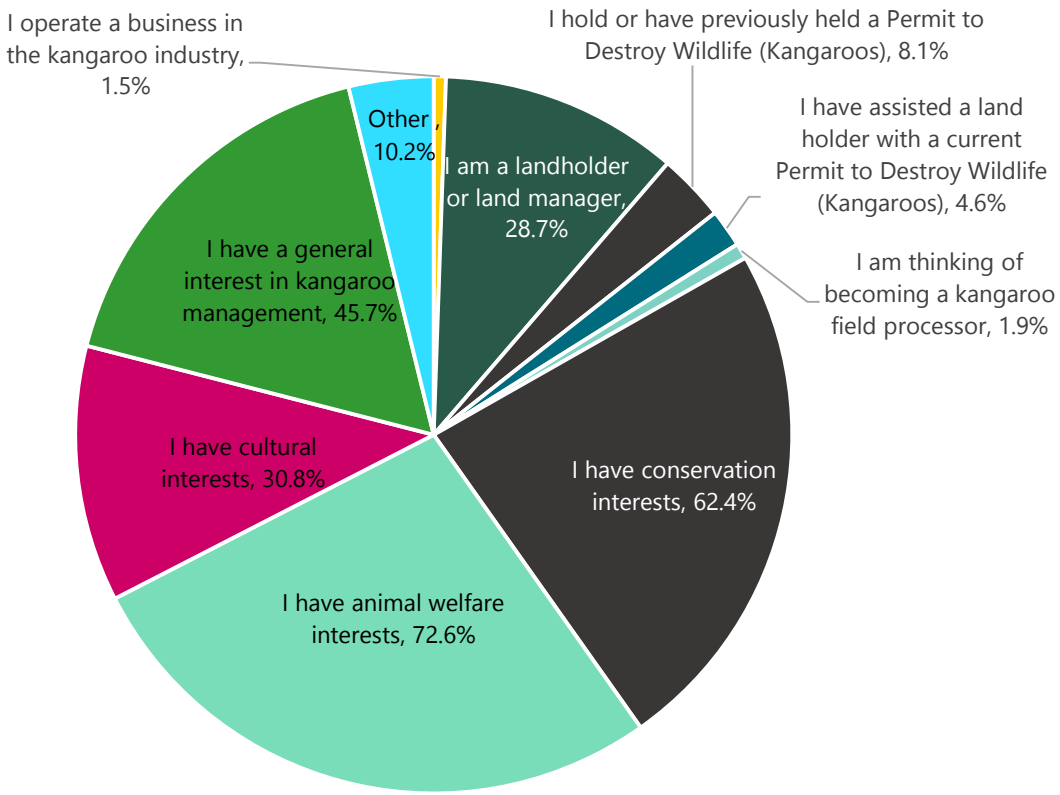


Figure 1. Percentage the number of respondents that identified with each stakeholder group presented in question 1 of the YourSAy survey. Respondents could select more than one group.

A total of 531 submissions were received, 487 from YourSAy and 46 from the kangaroo management email inbox. Based on the comments received, a high proportion of YourSAy respondents that identified as belonging to the animal welfare and conservation stakeholder groups were strongly against the proposal, most likely because they were philosophically against the shooting of kangaroos based on the comments they provided. However, those identifying as part of the kangaroo industry, holders of Permits to Destroy Wildlife, had previously assisted a landholder with a Permit to Destroy Wildlife or were interested in joining the kangaroo industry, were generally in favour of the proposal (Figure 2 and Figure 3). Some respondents were in favour of particular regions or species being included, but not others. For example, some respondents were concerned about shooting occurring in close proximity to people, such as in areas of the Adelaide Hills and Fleurieu region. Other respondents were in favour of their regions being opened as they only had knowledge of kangaroo species causing damage in their local area.

The key change made to the plan in response to the consultation was the removal of the red-necked wallaby from the proposal. Although the species has increased in distribution and abundance sufficiently to warrant its removal from the threatened species schedules of the NPW Act, the habitat preferences of the species and the low level of damage it causes to properties makes it inappropriate for inclusion in the commercial harvest.

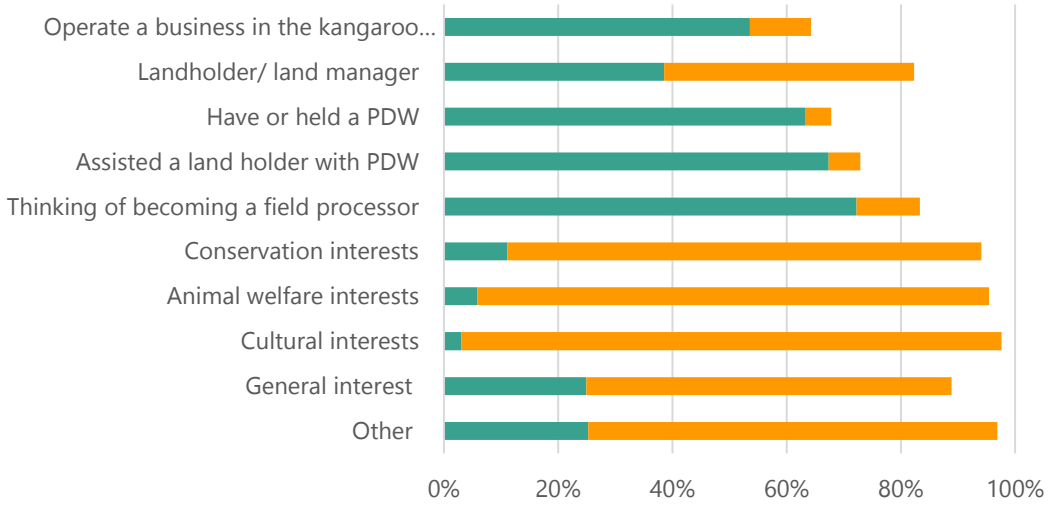


Figure 2. Percentage of respondents separated into stakeholder group that strongly agreed or agreed (green) or strongly disagreed or disagreed (orange) with the inclusion of the Eastern Grey Kangaroo, Kangaroo Island sub-species of Western Grey Kangaroo, Red-necked Wallaby and Tammar Wallaby. Some respondents were in favour of specific species, the data in this figure is a summary of all species pooled. Remaining respondents were neutral to the question.

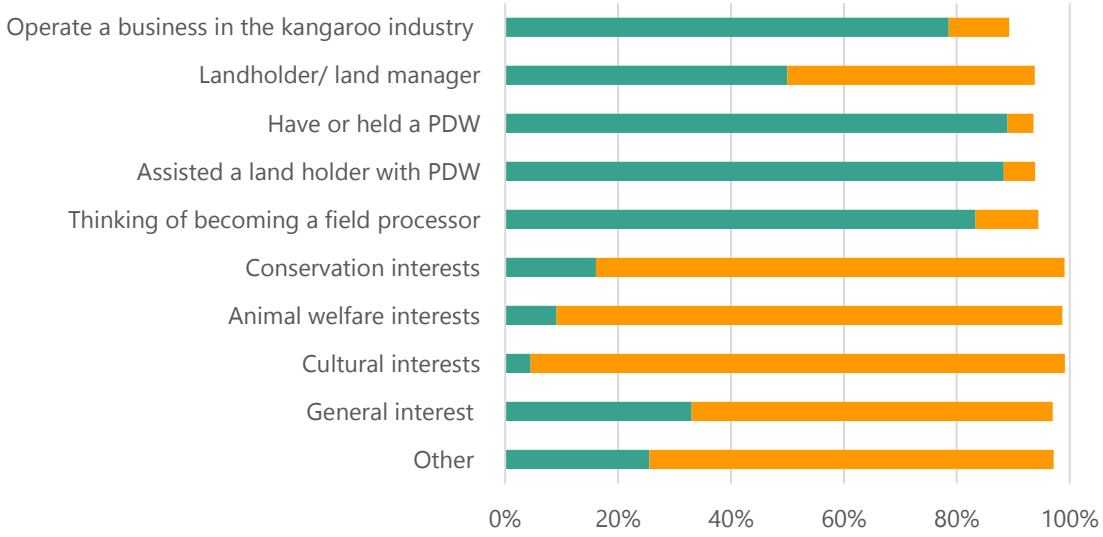


Figure 3. Percentage of respondents separated into stakeholder group that strongly agreed or agreed (green) or strongly disagreed or disagreed (orange) with the expansion of the commercial harvest area to include Adelaide Hills, Fleurieu Peninsula, York Peninsula, Lower North, Murray Plains, Upper South East, Lower South East and Kangaroo Island. Some respondents were in favour of specific areas, the data in this figure is a summary of all sub-regions pooled. Remaining respondents were neutral to the question.

Questions and responses

The consultation produced 2,743 comments from respondents. Below a sub-set of questions are answered that cover the main themes of questions received (Table 3).

Table 3: A sub-set of questions provided by respondents representing the main themes of questions received and a response to these questions is provided.

Question	Response
"…What if the reason a harvest is below this threshold is because the numbers are already low and the estimated population number is unreliable? The risk of over-harvesting is then detrimental but no-one will be aware."	Kangaroo populations naturally fluctuate in response to rainfall events and droughts. The purpose of the kangaroo surveys are to ensure that the harvest of kangaroos remains sustainable, therefore if the harvest is very low (below the threshold) there is no risk to the population. Furthermore, the harvest sub-regions are large, therefore the taking of a low number of animals across a large area is very unlikely to negatively impact the regional population of kangaroos. Further detail relating to the low harvest threshold has been provided in the plan.
"how sustainable is this and what impact will it have on ecology?"	The kangaroo harvest program has run for over 40 years and during that time has shown to be sustainable for the species harvested (refer to Appendix 2 of the plan).
"These are all listed by the government as at risk - why are you allowing them to be shot commercially?"	At the time of consultation, work was on-going to review Schedules 7, 8 and 9 of the *National Parks and Wildlife Act 1972*, and the Eastern grey Kangaroo, Red-necked Wallaby and Tammar Wallaby were listed on the schedules. All these species have now been removed from the schedules based on an independent review of their distribution and abundance. The review showed that the populations of these species has increased so much in recent years they cannot be considered to be threatened..
"Is this different to the surveys in new areas? (Assume they would be more frequent and include baseline monitoring more than once prior to implementing harvesting)?"	New harvest sub-regions will be surveyed every three years if the harvest is above the Low Harvest Threshold and every five years if the harvest is below the threshold. DEW will conduct a risk assessment prior to conducting surveys and surveys may be conducted more frequently if harvests are close to quota (refer to Aim 4 in the plan).
"What do you propose when the numbers become critical, and how do you propose to record numbers accurately?" "How about a No harvest threshold???"	Low abundance trigger points are retained in this plan and will be enforced if population estimates decline to these trigger points (refer to Action 13). Standard aerial and ground surveys will be used to count kangaroos.
"Are the local indigenous people in charge of estimates and assessment?"	DEW conducts the surveys and regulates the commercial harvest under the *National Parks and Wildlife Act 1972*. The Kangaroo Management Reference Group that advises the Chief Executive of DEW on the implementation of the plan and kangaroo management includes an Aboriginal member.
"What is the model to be used? Published academic research shows that roo counting is extremely difficult, which method are you planning to use?"	The model is a predictive model that is developed specifically for South Australia. The model is based on kangaroo population data for up to 30 years from aerial surveys and climatic variables including rainfall. DEW is conducting aerial surveys in the more remote and open areas and ground surveys in the more populated areas and where vegetation is less sparse.

Question	Response
"Are these commercial harvesters held to account for the numbers they are killing - how are they held to account - do they self report - what penalties apply if they fail to meet these standards?" "Who determines this threshold and what kind of accountability is there to the harvesters to report their takings?"	Commercial kangaroo field processors and kangaroo meat processors are required by legislation to provide monthly returns to DEW that show the number of kangaroos by species and sex that have been harvested, sold and bought. Information from field processors are double checked with that provided by meat processors to ensure information is correct. Furthermore, field processors pay a royalty to DEW in the form of a tag that must be attached to all kangaroo carcasses harvested. Penalties apply for not attaching tags to carcasses. This process allows DEW to track the harvest and ensure the number of kangaroos harvested does not exceed the quota set.
"If harvesting quotas are increased, the commercial harvesters will increase their business & expectations - thus when quotas are reduced, how are authorities ensure they will comply?"	Quotas are set at 10-20% of the estimated population. Currently only 15% of the set quota is harvested which is equivalent to around 2% of the total population estimate.
"The only challenge in expanding the zone is the more dense the human population the greater the risk of an accident with people or farm animals being impacted."	Firearm use must occur safely and in alignment with the appropriate legislation administered by the South Australian Police (SAPOL). Landholders must give permission before kangaroo harvesting may occur on their property, and should arrange safe times and appropriate areas for field processors to shoot kangaroos.
"The tags are too expensive. The licence fees are too expensive. The price per kg from the processors is too low. NOBODY ever seems to address these points???? It's just a big surprise that there used to be 140 shooters in SA and now there is only 40. I wonder why????"	Noted. The fees and charges associated with the commercial harvest of kangaroos assist are used to regulate the industry and maintain access to markets. Financial returns for industry participants have declined over the past ten years due to the loss of several export markets. Both State and Commonwealth governments are working with the kangaroos industry to improve access to markets.
"What animal welfare perspectives are being considered?"	All animals must be shot in accordance with the *National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes* and abide by the *Animal Welfare Act 1985*. Penalties apply for not following these requirements.

Summary of feedback – Commonwealth consultation

Table 4: Summary of feedback received during the Commonwealth consultation period.

Section of plan	You said	We did
Introduction	It is pleasing to note that reference is made regarding meeting community expectations and methods will not breach the *Animal Welfare Act 1985*.	Noted.
	The Plan describes the expansion of the commercial zone to virtually incorporate the whole of SA.	No change.
	Concerns are that despite having some (potential) positive impacts (i.e. the extra training required for non-commercial shooters to become commercial shooters and the utilisation of shot kangaroos) – this change is also expected to result in negative impacts, including: • Increased risk to long-term welfare of kangaroo populations. We don't have sufficient research on the long-term impacts of using kangaroos as a resource.	Data from harvestings kangaroo for 40 years has not shown any negative long-term impacts on the population. Quotas are set to ensure a sustainable harvest. No change.
	• The setting of unacceptably high quotas, since evidence is not required to demonstrate kangaroo damage on a case by case basis.	Only species that are known to be damage causing species are being included in the commercial harvest. DEW has regularly issued non-commercial Permit to Destroy Wildlife for these species for at least the last 10 years. No change.
	• The focus on kangaroo numbers as the primary determinant for expanding the commercial zone has resulted in other important considerations being ignored.	The proposed expansion of the commercial zone originated from landholders applying for an increased number of Permits to Destroy Wildlife (PDWs) to mitigate damage caused by kangaroos. Many correspondents expressed concern that these animals were being wasted and commercial use of their bodies would be a more acceptable outcome.
	• Erosion of the social license to undertake lethal control programs at a time when the social license is already threatened.	DEW issues PDWs and regulates the commercial harvest in line with DEW 'Living with Wildlife' policy. The policy promotes non-lethal methods of wildlife management first and acknowledges that in some instances lethal controls are necessary. DEW encourages an integrated approach to managing kangaroos as part of overall land management objectives.
	• An over-reliance on kangaroo shooting as a means of addressing drought impacts instead of destocking, storing additional supplementary feeding, diversifying and/ or taking other actions.	The impacts of the drought have been widespread and severe. Destocking, supplementary feeding and other coping strategies have been adopted by landholders. Decreasing grazing pressure by reducing kangaroo numbers is part of this integrated approach and does not replace other measures to minimise drought impacts

Section of plan	You said	We did
	Confusion regarding the number of species being included in the commercial harvest, differing species on web site compared to plan.	No change.
	Noting that the 2020-2024 plan includes six species whereas as the 2018-2022 plan only included three.	This plan includes three additional kangaroo species that are damage causing species in the new harvest regions.
	It is pleasing to note that reference has been made regarding animal welfare in the last paragraph by referring to the Commercial Code but it also mentions the non-commercial code. The RSPCA strongly advocates for one welfare kangaroo code (the Commercial Code) as the non-commercial code is deficient in meeting acceptable welfare standards.	No change. Non-commercial Code of Practice is the current national standard for non-commercial culling of kangaroos.
3.1 Goal	Suggest amend: 'To provide for the sustainable use of macropod species referred to in this plan in accordance with the principles of ecologically sustainable development' TO 'To provide for the sustainable use of macropod species referred to in this plan in accordance with the principles of best practice humane animal management and ecologically sustainable development.'	No change. The goal of the plan is to ensure that viable populations of kangaroos are maintained. Although DEW acknowledges the need to ensure the harvest is humane, this is covered in Aim 1 and Aim 5.
	-After 2nd sentence down: 'The principles of ecologically sustainable development are defined in section 3A of the EPBC Act', Suggest adding: 'The eight principles of humane vertebrate pest control, derived from 'A National Approach to Humane Vertebrate Pest Control' workshop held in 2003, can be applied to the humane management of kangaroo populations.	The 8 principles of humane vertebrate pest control do not relate to the commercial kangaroo harvest as principles 1, 2, 6 and 7 relate strongly to a pest management scenario. The remaining principles do not add any further protection to the kangaroos than compliance with the Commercial Code of Practice already provides
4.1 Ensure Humane Treatment of Kangaroos	It is pleasing that the 'Humaneness Model' is referenced here. - Suggest insert 'ground shot' after 'head shot' in 3rd sentence down.	Noted. No change. Additional text does not improve clarity.
	The Plan states that commercial harvesting must only be carried out in accordance with the Commercial Code. However, although this Code has been reviewed, no public consultation has been conducted on the revised version and therefore new amendments have not been adopted. The current Code was released in 2008 and following the release of critical research findings in 2014 RIRDC report 'Improving the humaneness of commercial kangaroo harvesting' which would improve animal welfare, there has been a significant delay in adopting new practices to improve welfare outcomes. In future, delays of this nature should not occur to ensure that sound welfare practices can be adopted as quickly as possible. Appendix 1 provides a summary of the key aspects in the current Commercial Code, which need to be updated.	No change. Until a revised Commercial Code of Practice is approved by an appropriate Commonwealth body DEW will continue to use the current national Commercial Code of Practice.
	Action 1 - End of first para, suggest adding: 'Suspected breaches of the Animal Welfare Act 1985 must be reported by DEW (or others) to the appropriate	Most DEW wardens are also appointed as inspectors under the *Animal Welfare Act 1985* so can take action if they suspect a

Section of plan	You said	We did
	authority for investigation. DEW must provide a practical means for suspected breaches of this Act to be reported'.	breach. Each region also has specialist compliance officers and the central Investigations and Compliance Unit can assist in complex matters. In addition, DEW works closely with the RSPCA and SAPOL on enforcement issues.
	Action 1 PI -PI 1.1 is supported, but suggest making the current 1.1 into 1.2.	No change. This action does not limit DEW's ability to investigate any breaches under legislation administered by the Minister for Environment and Water, including the *Animal Welfare Act 1985*.
	-Suggest adding the following as PI 1.1: 'DEW to conduct inspections – then include a descriptor to reflect the minimum percentage of licensees inspected annually and a minimum percentage of the kangaroos killed as specified' (Reason: this PI for DEW is essential to reassure the community of the degree of regulatory oversight of this activity).	Action 20 states that DEW will conduct regular and opportunistic monitoring of compliance by the commercial industry operators. All chiller premises will be inspected at least annually by DEW or Biosecurity SA staff and all processing works will be inspected at least twice a year (PI 20.1 and 20.2). DEW inspects carcasses at each compliance visit and a random sub-sample is investigated to ensure compliance with *Commercial Code of Practice, Kangaroo Harvesting Regulations*, the plan and permit conditions.
4.1 Aim 1 Ensure Humane Treatment of Kangaroos	Action 2 – 2.1 PI – states that DEW will participate in the review of the Commercial Code but it should include a commitment to advocating for changes to improve animal welfare outcomes.	No change. DEW is participating in the review of the Commercial Code of Practice through our representatives as regulators on the Reference Group. Animal welfare and sustainability are central considerations of the Group
	2.2 PI – suggest that DEW promotes but also supports, instigates and participates in research to improve animal welfare outcomes… RSPCA strongly supports PI 2.2, but suggests adding names of the parties who will be accountable for these PIs. The following statement was noted on page 5 in the Review of the SA KMP: Members suggested that more research could be conducted on animal welfare concerns relating to the commercial harvest (Action 2) and that while DEW would not necessarily conduct the research themselves, DEW engage with research organizations (e.g. universities). Members suggested that a list of potential research questions could be developed, stating clearly where knowledge gaps exist. Potential areas that may benefit from further study may include improvement of marksmanship, equipment used for shooting kangaroos and improvements to the humane destruction of joeys and young at foot.	DEW will continue to promote research into improved animal welfare outcomes with interstate government bodies and industry partners at a national level.

Section of plan	You said	We did
	Members also raised the possibility that projects could be coordinated at a national level, rather than state level. Without government commitment to push for research, this is unlikely to be undertaken. There is an urgent and critical need for research on key aspects as mentioned above to be undertaken as soon as practicable.	
4.2 Aim 2 Promote Community Awareness and Participation	Action 3 – Suggest amending: 'The current membership of KMRG encompasses representatives of animal welfare….' TO 'The current membership of KMRG encompasses one representative of animal welfare……..' (Reason: to enhance accountability we suggest publishing the number of representatives from each interest group within the KMRG membership).	No change. Current wording refers to groups that are represented on KMRG rather than the number of individuals from each group. The KMRG operates by consensus not vote so the number of representatives is not as important as their inputs.
	Action 4 – 4.1 Suggest including link to the Commercial Code on the webpage https://www.environment.sa.gov.au/topics/plants-and-animals/Abundant_species/kangaroo-conservation-and-management It is noted that the webpage is out of date as it refers to making a submission regarding the public consultation for the draft plan at the state level.	Links to both Codes of Practice are found at the following webpage https://www.environment.sa.gov.au/licences-and-permits/wildlife-permits/laws-guidelines/kangaroo-guidelines however work is on-going to make the webpages more user friendly.
	Suggest adding new dot point after existing dot-points: 'current and previous inspection reports, with individual and company names removed.' (Reason: to provide an assurance of the robustness and independence of the monitoring program).	Compliance action taken is reported in the annual Harvest Report which is made available on the DEW Kangaroo Conservation and Management web page.
	Action 7 – 7.2 DEW will encourage Aboriginal participation in kangaroo management. Should this state …Aboriginal participation in kangaroo management planning? as the current wording suggests that DEW will encourage Aboriginal participation in actually managing kangaroos, i.e. humane killing. It is not clear how this would be done in regard to commercial harvesting.	No change. Aboriginal participation in the kangaroo industry will be developed in consultation with Aboriginal people. Some may become field processors or harvest kangaroos and others may be involved in planning.
4.3 Aim 3 Manage impacts of kangaroos on land condition	Introductory paragraph – it is pleasing to note that landholders will be encouraged to engage a commercial shooter as this should result in higher welfare standards compared to kangaroos shot under a destruction permit.	Noted.
	Action 8 RSPCA strongly advocates for anyone shooting a kangaroo to be trained and deemed competent to the level required for commercial shooters. For this to occur, either the welfare requirements for both non-commercial and commercial shooters must be equivalent or the non-commercial code must be phased	Any person who kills any animal must do so in accordance with the *Animal Welfare Act 1985*. Failure to do so can result in prosecution. It would be inappropriate to require a person to pass a marksman test prior to being issued with a PDW for a kangaroo but not for other species.

Section of plan	You said	We did
	out, leaving all shooters to comply with the commercial code.	
	It is unclear as to what non-commercial techniques refer to, i.e. does this include exclusion fencing or shutting off water points or preventing access (we have received reports that the latter is done resulting in inhumane deaths of kangaroos and other native species – this should be prohibited due to the significant suffering caused to animals.	The options that landholders may choose include fencing and water point management. It is an expectation, though not a legal requirement, that particularly in drought areas, landholders will humanely destroy moribund animals including livestock, feral species or native (with appropriate permits). **Change 'techniques' to 'options'**
	Action 8 PI 8.2 It is pleasing that DEW is being provided with materials to encourage landholders to use commercial shooters over non-commercial shooters. However, given the animal welfare problems inherent with non-commercial shooters, RSPCA encourages DEW to incentivise the use of commercial shooters over the use of non-commercial shooters. For instance, in PI.8.2 we suggest adding at the end of this PI: '…Non-commercial shooters will be strongly encouraged to upskill to commercial shooters by further reducing the fees associated with the extra training and related costs involved and by significantly increasing the cost of non-commercial (i.e. destruction) permits.' However, as previously expressed, we believe kangaroo shooting should not occur unless sufficient evidence has been provided on a case by case basis, to demonstrate that culling is required to mitigate serious kangaroo welfare or environmental damage problems.'	No change. DEW encourages all landholders in the commercial harvest area applying for a PDW to consider the commercial harvest before issuing a PDW. Applicants of PDWs must detail the damage being caused by the kangaroos.
4.4 Aim 4 Monitor kangaroo populations & set quotas	Action 10 Suggest adding a dot-point: • 'Animal welfare concerns'	Accepted. Addition will be made as suggested. **Change. Include animal welfare concerns as it relates to droughts.**
	Action 15 PI 15.2 Regarding contents of the Quota Report, suggest adding the following dot point, which was included in the previous Report: 'any changes to Commercial Harvest Sub-Region or CHMR boundaries or new commercial areas, and justification based on survey results.'	No change. Under the new National Parks and Wildlife (Kangaroo Harvesting) Regulations 2018 no changes to the harvest boundaries may occur through the Quota Report.
	And suggest amending the dot point that states: 'any proposed changes to quotas' TO 'any proposed changes to quotas and reference the research and evidence that justifies the change'.	No change. All changes must be made to the Management Plan, therefore "any changes to Commercial Harvest Sub-Region or CHMR boundaries or new commercial areas, and justification based on survey results" has been removed.

Section of plan	You said	We did
	In terms of how kangaroo populations will be monitored under the new Draft Plan (i.e. indirectly through 'returns' from the commercial industry along with the numbers permitted to be taken by non-commercial permits), the RSPCA is concerned that the lower rate of population monitoring proposed by the Plan will lead to data gaps that increase the margin of error for setting quotas.	Quotas will be set as per this management plan (Action 4).
	(Reason: The top listed Aim in Section 3.2 of this Plan is to: 'Promote improved animal welfare outcomes and ensure that the commercial harvest of kangaroos under this plan is carried out following the Commercial Code'. A reduced population monitoring regime is not consistent with this aim).	Population estimates will be determined using the data driven population model developed for South Australia and the model will be validated by surveys. If the risk assessment conducted each year raises concerns regarding the kangaroo population, additional surveys will be conducted.
	Action 16 PI 16.1 Suggest DEW has a responsibility to monitor the health and sustainability of kangaroo populations at least annually and that it samples at least 30% of the total commercial kangaroo permits twice per year to determine that they are processed and issued by South Australian legislation and DEW policy.	No change. DEW monitors returns regularly throughout the year to assess trends in harvest rate, average weight of kangaroos and sex ratio. If DEW is concerned that weights are too low, DEW has the ability to place weight restrictions on the kangaroos that may be harvested. Monitoring of wildlife health is undertaken nationally by the Wildlife Health Network. Unexplained deaths and illnesses are reported and, if appropriate, investigated
4.5 Aim 5 Monitor industry compliance	PI 17.1 Suggest amending: '17.1 DEW will assess a sample of commercial kangaroo permits across South Australia twice per year to determine that they are processed and issued by South Australian legislation and DEW policy' TO 'DEW will assess 30% of commercial kangaroo permits across South Australia twice per year to determine that they are processed and issued by South Australian legislation and DEW policy.' (Reason: at least 30% is required to provide robustness).	No change. All permits are checked for compliance to SA legislation and DEW policy at permit renewal and a subset of permits are checked mid-term to ensure they are compliant.
	Action 18 PI 18.2 Support the addition of this PI.	Noted.
	Action 20 After 'Biosecurity SA (Food Safety) will report any observed breaches of permit conditions to DEW for further investigation'... suggest ADDING: 'Biosecurity SA and or DEW will advise RSPCA SA of suspected breaches of the Animal Welfare Act 1985. An associated MOU may need to be developed or amended to facilitate this'.	No change. Most DEW wardens are also appointed as inspectors under the *Animal Welfare Act 1985* so can take action if they suspect a breach. Each region also has specialist compliance officers and the central Investigations and Compliance Unit can assist in complex matters. In addition, DEW works closely with the RSPCA and SAPOL on enforcement issues.

Section of plan	You said	We did
	Action 21 1st paragraph Support but suggest strengthening by amending: 'DEW may require that kangaroo field processors undertake further training as a corrective action if non-head shot carcasses are discovered during inspections' TO 'In response to non-head shot carcasses, DEW will take corrective action and require field processors to undertake further training (as a minimum).	Noted. No change.
	-Suggest adding PI 21.3: 'PI.21.3 DEW will record and publish statistics on the total number of Kangaroo Field Processors submitting permit applications, the percentage of these applications that meet all 3 requirements (i.e. firearms licence, accuracy competency course & wild game harvester course) and the percentage of applicants that require further training as a corrective action.' Self-assessment tools are useful to create awareness but are not sufficiently robust to ensure competency, so competency must be assessed independently.' (Reason: this transparency is important to gain community trust and maintain a social license).	DEW only issues Kangaroo Field Processor Permit to those that meet all three requirements. Breaches of legislation or permit condition are reported in the annual Harvest Report (Action 28).
	Action 21 – PI 21.2 Suggest amending PI 21.2 from: 'DEW will liaise with training providers (e.g. TAFE SA) to ensure that the kangaroo field processor training syllabus is up to date with current legislation, the Commercial Code or any other standards approved nationally' TO 'DEW will liaise with training providers (e.g. TAFE SA) to ensure that the kangaroo field processor training syllabus is up to date with current legislation, the Commercial Code and other nationally approved standards. The syllabus should also incorporate recommended best practice as identified by the 2014 RIRDC report (McLeod & Sharp) and test applicants' competency to deal with injured kangaroos and dependent, orphaned young.'	Noted. Training providers do address appropriate methods of dealing with injured kangaroos and dependent, orphaned young and stress the importance of managing such animals as per the Commercial Code of Practice.
	Suggesting adding PI 22.2: '22.2 Annual compliance statistics will be published'.	No change. Compliance statistics are reported annually in the Harvest Report (Action 28)
	Action 24 A compliance database will be maintained to support investigations, inspections and audits. We strongly support the maintenance of a compliance database. It is described that the database will contain reports of alleged breaches of the NPW Act, Regulations and/or permit conditions, investigation activities undertaken and outcomes of investigations.	No change. Out of scope. Data base will be maintained. DEW will carry out appropriate compliance action as necessary when breaches of legislation or permit conditions are found.
	We suggest the database also include alleged breaches of the Animal Welfare Act 1985 and that RSPCA SA and	Most DEW wardens are also appointed as inspectors under the *Animal Welfare Act*

Section of plan	You said	We did
	SAPOL be notified immediately of these allegations. We recommend the delegation of sufficient resources to ensure effective maintenance of the database.	*1985* so can take action if they suspect a breach. Each region also has specialist compliance officers and the central Investigations and Compliance Unit can assist in complex matters. In addition, DEW works closely with the RSPCA and SAPOL on enforcement issues.
	I 24.1 We suggest amending from: '24.1 DEW will maintain compliance records of industry returns TO 'DEW will maintain compliance records detailing industry returns, alleged breaches of relevant regulation (or permit conditions) and investigation outcomes.'	Accepted. Addition will be made as suggested. **Change to "DEW will maintain compliance records relating to the commercial kangaroo industry"**
	We suggest adding another PI: 24.2 The compliance database will be sufficiently resourced to ensure data is accurate and current and relevant agencies are promptly notified of alleged breaches, including those of the Animal Welfare Act 1985.	No change. The compliance database includes all detected breaches of legislation and is adequately resourced to achieve this.
4.6 Facilitate adaptive management and research	Support Actions 26 & 27	Noted.
4.7 Undertake program reporting and review	Action 28 PI 28.1 Pleased to see the inclusion of a dot-point for any animal welfare improvements adopted. However, under the compliance statistics dot points, we suggest amending: 'number of premises inspected' TO 'number of premises inspected as a percentage of the total number of licensed premises.' (Reason: this is important for transparency and to give the public confidence in the compliance process).	No change. All chiller premises will be inspected by either DEW or Biosecurity SA staff each year (PI 20.1) and total number inspected by DEW is reported in the Harvest Report each year.
	Action 29: 29.3 Suggest adding link to the Kangaroo Conservation and Management web page. https://www.environment.sa.gov.au/topics/plants-and-animals/Abundant_species/kangaroo-conservation-and-management	No change. The Harvest Report is the annual report detailing progress on the Management Plan (Action 28).
	It is disappointing that the page has no information regarding any performance indicators listed in the 2018-2022 Plan. Despite a new plan (the Plan) being developed, it would be helpful if annual progress performance indicator reports were made available on the review of the 2018-2022 Plan to demonstrate that PIs had been achieved during 2017 and 2018. The latest review report available on the DEW website is for the review of the 2013-2017 KMP, which is dated October 2017.	All reports are made available on the kangaroo conservation and management plan when they become available.

Section of plan	You said	We did
General comment about Performance Indicators	To help ensure transparency and accountability as well as provide evidence of progress in terms of the Plan, it is recommended that the annual Commercial Kangaroo Harvest Report for South Australia includes details of progress on all performance indicators listed in the plan. This provides an assurance that appropriate monitoring is being undertaken on an ongoing basis as well as data collected, analysed, interpreted and reported.	Noted. A complete review of all PIs will occur at the end of the five year period for the management plan.
	The most recent report dated March 2019 does not include a status report on performance indicators. On page 12 of the report, it states that 'Compliance inspections at the meat processors' facilities provide a good picture of the level of compliance of field processors with tagging carcasses and complying with the National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes.' The RSPCA disputes this claim, as inspection of the processors facilities do not allow for monitoring of the following: - Kangaroos who are shot but are not collected due to a clean head shot not being achieved - Humane killing of orphaned joeys cannot be assessed Field checks where recent harvesting has been conducted and monitoring whilst shooters are actively shooting must be carried out to ensure key aspects of the Commercial Code are not breached.	DEW does and will continue to monitor industry operators through compliance visits and audits. If DEW have reason to be concerned that kangaroos are not being taken according to the code of practice, a field inspection may be conducted.

Appendices

Appendix 1: Engagement methodology

Information Provision

YourSAy Survey

Draft South Australian Commercial Kangaroo Management Plan 2020 - 2024 - Consultation Survey

Welcome to the consultation survey about changes to kangaroo management in South Australia.

Your ideas and opinions will help shape the way kangaroos are managed across our state and the Draft South Australian Commercial Kangaroo Management Plan 2020 - 2024.

Thank you for being part of the future of kangaroo management.

We ask you to identify yourself as part of the survey, as it is important that we understand the source of the input.

We may also publish the responses to our webpage. If you don't want this to happen please make a comment to this effect in the final comment box of the survey.

1. What is your name and, if relevant, the name of your business or organisation?

2. Which of the following best describes your interest in kangaroo management? (more than one may be selected)
   - 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 let us know what your other interest is

3. We are proposing to expand the commercial kangaroo harvesting zone to cover the entire state, excluding the Alinytjara Wilurara Natural Resources Management Region for cultural reasons and metropolitan Adelaide. To what extent do you agree or disagree with the addition of the following areas to allow the commercial harvesting of kangaroos in South Australia?
   - Adelaide Hills and Fleurieu Peninsula
   - Kangaroo Island
   - Upper South East
   - Lower South East
   - Murray Plains
   - Yorke Peninsula and Lower North

4. Please tell us any other thoughts you have about expanding the commercial harvesting zone for kangaroos to cover the entire state.

5. To what extent do you agree or disagree with considering the addition of the following kangaroo species for commercial harvesting in South Australia?
   - Eastern Grey Kangaroo

- Kangaroo Island sub-species of Western Grey Kangaroo
- Red Necked Wallaby
- Tammar Wallaby - on Kangaroo Island only

6. Please tell us any other thoughts you have about the new kangaroo species considered for commercial harvesting.

To monitor kangaroo numbers in established areas where commercial harvesting of kangaroos already takes place, we propose that surveys will be conducted every three years. In three of those areas, data will be collected every year to calibrate a climate based population model. This model will be used to predict the population estimate For the years in-between surveys.. Surveys will be conducted in the new harvest areas before kangaroos can be commercially harvested.

7. To what extent do you agree or disagree with the survey frequency and the method to obtain population estimates for kangaroos?

8. Please tell us any other thoughts you have about the survey frequency and the method to obtain population estimates.

A 'Low Harvest Threshold' is a new proposed concept. If the number of kangaroos harvested is below this threshold, it will be deemed that the risk to the overall kangaroo population is low and the number of surveys of kangaroo numbers can be reduced. It is set at a conservative number of animals and will be reviewed at the end date of the management plan.

9. To what extent do you agree or disagree with the use of the Low Harvest Threshold?

10. Please tell us any other thoughts you have about the use of the Low Harvest Threshold.

When kangaroo populations are high, it is proposed that harvesting quotas may be increased. This aims to reduce any overabundance of kangaroos that naturally follow periods of abundant resources, for example, plentiful water resources, pasture, crops or vegetation. This will minimise the impacts of high kangaroo numbers and the number of kangaroos subject to starvation when drier conditions follow.

11. To what extent do you agree or disagree with this?
12. Please tell us any other thoughts you have about this.
13. Do you think the revised draft plan gets the balance right between conservation and commercial kangaroo management?
14. Are there any other comments you would like to make about the South Australian Commercial Kangaroo Management Plan?

To support the proposed changes, amendments will need to be made to the National Parks and Wildlife (Kangaroo Harvesting) Regulations 2018. These amendments will include:

- Additional kangaroo species will be included to enable these species to be harvested

15. To what extent do you agree or disagree with the proposed amendments to the National Parks and Wildlife (Kangaroo Harvesting) Regulations 2018?
16. Please tell us any other thoughts you have about the amendments to the National Parks and Wildlife (Kangaroo Harvesting) Regulations 2018.
17. Please tell us any other comments you have relating to kangaroo management or this survey.

Thank you. Your responses are valuable to us and we appreciate your time and effort in completing this survey.

Email to external stakeholders inviting comment on the draft Management Plan.

Subject title: **Have your say on changes to commercial kangaroo harvesting**

Dear Mr / Ms / Mrs

I write to seek your views on the draft South Australian Commercial Kangaroo Management Plan 2020-2024.

High kangaroo numbers across the state have prompted a review of the SA Commercial Kangaroo Management Plan to protect the environment, reduce kangaroo suffering, support the agricultural and commercial kangaroo harvest industries, and keep motorists safe. While recent drying conditions have resulted in a natural decline of kangaroo numbers in the north of South Australia, populations remain high, in particular in the southern parts of the state.

The Department for Environment and Water (DEW) regulates the commercial kangaroo harvest industry and is proposing to:

- expand the commercial kangaroo harvesting zone to also cover Yorke Peninsula, Adelaide Hills, Fleurieu Peninsula, Kangaroo Island and the South East
- increase the number of species available for harvest to include tammar wallaby, Kangaroo Island sub-species of western grey kangaroo, eastern grey kangaroo and red-necked wallaby
- change the methods used for determining harvesting quotas.

The commercial harvest will be an additional management tool that will enable kangaroos to be used for meat or skin production rather than left on the ground.

The four kangaroo species considered for inclusion into the commercial harvest are not threatened, and data demonstrate that their abundance and distribution has increased over the last 10 years. Surveys to determine population estimates will be conducted for each species in each new harvest sub-region before quotas will be set and kangaroos can be harvested.

In addition to the management plan, changes will also need to be made to the National Parks and Wildlife (Kangaroo Harvesting) Regulations 2018 to allow the additional species to be harvested.

Comments on the amended plan are welcome until 06 September 2019.

The plan can be accessed via the South Australian Government's YourSAy website https://yoursay.sa.gov.au. Instructions for the various ways you can submit feedback are available on the website.

For further information, to request a hard copy of the plan or to submit feedback during the consultation period, please contact Amanda McLean, Kangaroo Ecologist/ Policy Officer, Department for Environment and Water, on phone 08 8648 5300 or email amanda.mclean2@sa.gov.au.

FAQs sent to key stakeholders to assist them in answering questions from their stakeholders. These included Livestock SA, Conservation Council SA and RSPCA.

Information package sent to DEW staff in the regions to assist them in answering questions from interested members in their communities.

Promotion and Notification

Gazette notice – Thursday 6 June 2019

NATIONAL PARKS AND WILDLIFE ACT 1972

South Australian Commercial Kangaroo Management Plan 2020-2024- Draft

I, BEN BRUCE, A/Chief Executive of Department for Environment and Water, hereby give notice under the provisions of section 60I of the *National Parks and Wildlife Act 1972*, that a draft of the South Australian Commercial Kangaroo Management Plan 2020-2024 is now available for public comment.

The draft plan is available online from the Department for Environment and Water at:

- DEW Kangaroo Conservation and Management website http://www.environment.sa.gov.au, and
- The South Australian Government's YourSAy website https://www.yoursay.sa.gov.au.

Hard copies of the plan are available on request.

Any person may make representations in connection with the draft management plan during the period up to and including 6 September 2019.

Written comments should be forwarded to Amanda McLean, Kangaroo Ecologist/ Policy Officer, Natural Resources SA Arid Lands, Department for Environment and Water, PO BOX 78 PORT AUGUSTA SA 5007 or e-mailed to kmp@sa.gov.au.

Dated: 6 June 2019

B. BRUCE
A/Chief Executive of Department for Environment and Water
Delegate of the Minister for Environment and Water

Advertisment in The Advertiser – Friday 7 June 2019

Government of South Australia
Department for Environment and Water

South Australian Commercial Kangaroo Management Plan

Interested members of the public are invited to comment on a draft of the South Australian Commercial Kangaroo Management 2020-2024.

The draft plan is available online from the Department for Environment and Water (DEW) at:

DEW Kangaroo Conservation and Management website http://www.environment.sa.gov.au/, and

The South Australian Government's YourSAy website https://www.yoursay.sa.gov.au

Hard copies of the plan are available on request.

Enquiries and submissions to:
Amanda McLean
Kangaroo Ecologist/ Policy Officer
Natural Resources SA Arid Lands
Department for Environment and Water
PO BOX 78
Port Augusta SA 5700

T: 08 8648 5300
E: kmp@sa.gov.au

Online submissions:
https://www.yoursay.sa.gov.au

Submissions will form part of the public record unless otherwise requested.

Submissions close 6 September 2019.

PN3866

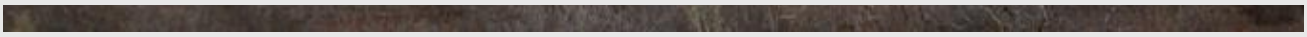
www.environment.sa.gov.au

PN3866
17x2 (63mm)
Adelaide Advertiser
Friday 7 June 2019

DEW Weekly post – internal consultation only

Have your say on changes to commercial kangaroo harvesting

DEW staff are invited to have their say on the updated draft **South Australian Commercial Kangaroo Management Plan** (internal access only).



While recent drying conditions have resulted in a natural decline of kangaroo numbers in the north of South Australia, populations remain high across other parts of the state.

An overabundance of kangaroos has prompted a review of the SA Commercial Kangaroo Management Plan to protect the environment, reduce kangaroo suffering, support the agricultural and commercial kangaroo harvest industry and keep motorists safe.

The updated plan proposes to:

- expand the commercial kangaroo harvesting zone to also cover Yorke Peninsula, Adelaide Hills, Fleurieu Peninsula, Kangaroo Island and the South East
- increase the number of species available for harvest to include tammar wallaby, Kangaroo Island sub-species of western grey kangaroo, eastern grey kangaroo and red-necked wallaby
- change the methods for determining harvesting quotas.

The proposed updates provide a tool to support primary producers, local government and the commercial kangaroo industry to better manage overabundant kangaroos and ensure kangaroos are used for meat or skin production rather than left on the ground.

To support these changes to the commercial kangaroo industry, amendments to the *National Parks and Wildlife (Kangaroo Harvesting) Regulations 2018* will also be made. Because of this interaction, this consultation period on the plan also includes consultation on the amendments.

You can submit your feedback until 6 September using the **template** (internal access only) or by contacting Kangaroo Management Senior Policy Officer **Amanda McLean**.

Electronic – Across the Outback article

News & Resources > News > Proposed changes to the management of kangaroos

Proposed changes to the management of kangaroos

Proposed changes to the way abundant kangaroo species and the commercial kangaroo industry are managed and monitored are now open for consultation.

As the industry regulator, the Department for Environment and Water (DEW) is proposing to:

- Expand the commercial kangaroo harvesting zone to also cover Yorke Peninsula, Adelaide Hills, Fleurieu Peninsula, Kangaroo Island and the South East
- increase the number of species available for harvest to include tammar wallaby, Kangaroo Island sub-species of western grey kangaroo, eastern grey kangaroo and red-necked wallaby
- change methods for determining harvesting quotas. It is expected that no substantial changes will be made to how the commercial industry operates in the established harvest zone.

You can view the draft SA Commercial Kangaroo Management Plan 2020-2024 on the Your Say Website www.yoursay.sa.gov.au

Consultation closes 06 September 2019

Appendix 2: Full summary of all stakeholder responses

Comment category	Number of comments
Adaptive management is important for this proposal	7
Oppose the commercial use or culling of kangaroos, and oppose the proposal to expand the commercial harvest area and include additional species • Kangaroos are controlled by nature • Kangaroo species should be protected • Profit seeking proposal • Cultural values • Unknown long-term impact of harvesting on genetics and populations • Reduce number of livestock rather than kangaroos	1658
Oppose the geographical expansion of the commercial harvest area • Oppose harvesting in national parks • Concern relating to risk to humans from shooting in high density areas	53
Oppose the inclusion of additional kangaroo species • Oppose all species • Oppose wallabies • Oppose Eastern Grey Kangaroos • Oppose Tammar Wallaby • Clarity regarding inclusion of reintroduced mainland Tammar Wallaby • Oppose Red-necked Wallaby • Lack of information regarding why species are being included	50
Support the proposal to expand geographical area of the commercial harvest area and include additional kangaroo species	182
Support for geographical expansion of the harvest area	91
Support for the inclusion of additional kangaroo species • Support for wallabies • Support for Tammar Wallaby • Support for Eastern Grey Kangaroos • Support for Western Grey Kangaroos • Support if number of kangaroos justify management • Support if monitoring of kangaroo species is adequate and based on science • Support harvesting of common species only • Support only if harvesting is for animal welfare or biodiversity protection • Support population bases management not location based • May assist in management of overabundant kangaroo species • Support harvesting in national parks • Only allow low level harvest on national parks (low harvest threshold) • Professional shooters involved in culling	46
Comments relating to boundary changes of sub-regions • No sub-region boundaries • Boundaries based on new NRM boundaries	5
Non-lethal methods of management should be used	22
Concerns regarding animal welfare • Lack of training for kangaroo shooters • Recognise animal welfare issues of high populations and starvation that follows • Increase compliance for animal welfare	38
Kangaroo numbers are high and causing damage to environment, farming pastures and pose a risk to motorists	47
Surveys • Lack of accuracy of survey data	253

Comment category	Number of comments
• Lack of science behind survey methods • Lack of transparency of surveys • Proposed survey frequency is too low • Must be cost effective • Only reducing surveys to save money • Timing of survey should be considered • Survey frequency too high • Local landholders should do survey • Insufficient monitoring of harvest and culling • Monitoring of populations should be conducted by independent body • Clarification needed regarding survey methods • Monitoring of kangaroo condition and road kill should be included	
Support for proposed survey frequency	13
Quota setting • Risk of over-harvesting • Define what 'high population' is (High Abundance Quota) • Consider climatic variables in quota setting • High abundance quota will increase supply of kangaroos, reduce profitability for field processors to go to some pastoral properties • Natural for populations to fluctuate • Quotas should be matched to the level of kangaroo damage occurring	33
Low Harvest Threshold • Set too high • Indication of commercial harvest only, not kangaroo population • Oppose to the use of low harvest threshold • Reduce population before using threshold • Apply to non-commercial culling and commercial harvesting	6
Permits to destroy wildlife • Too many Permits to Destroy Wildlife issued, landholders should work with kangaroo industry • Concern relating to high levels of illegal shooting occurring • Increase monitoring of Permits to Destroy Wildlife • Increase issuing of Permits to Destroy Wildlife • Waste of resource to level carcass on the ground	14
Concerns relating to sustainability of commercial program and government's ability to regulate the industry • Need for transparency of compliance actions	54
More information needed to make decision	36
Commercial industry • Low price paid per kg kangaroo meat • Industry should be de-regulated • Tags are too expensive • Should have 1 tag • Incentives should be provided to harvest kangaroos • Review of the fee structure and permit system is needed • Industry should be more involved in changes • More marketing of industry and kangaroo products is needed • Lack of infrastructure in regional areas	33
Multiple tools are needed to address overabundance • Drought strategy should include all herbivores • Reduce red-tape for kangaroo management	15

Comment category	Number of comments
• Joint effort required between harvest regions • Allow recreational hunters to participate • Reduce water points	
Kangaroo population has declined during drought	5
Promote community awareness	6
Overall plan/ proposal • Imbalance to conservation and kangaroos • Favours meat processors • Balance favours industry • Balance favours conservation • Approach still too conservative to reduce kangaroo populations • Complex problem • Goal needs greater clarity	60
General comments • Reserve judgement on proposal • Increase protection areas for kangaroos • Ensure that proposal aligns with existing legislation • Wildlife bridges • At least we have been asked • Safari tours • Goat control needed • Transportable slaughter house • Increase role of Kangaroo Management Reference Group	16

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