

Summary of public submissions received on draft Kangaroo Conservation and Management Plan for South Australia 2008-2012

SA Department for Environment and Heritage

Submissions summary

The draft *Macropod Conservation and Management Plan 2008 – 2012* was released for public comment under two pieces of legislation:

- Under the *National Parks and Wildlife Act 1972* (NPW Act), for a period of three months
- Under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), for a period of 20 business days.

Nineteen submissions were received in total, with 18 of these submissions received under the NPW Act, and one submission received under the EPBC Act.

Issues covered in submissions were diverse and varied. All six themes of the draft management plan, along with introductory and assessment of impacts sections, were covered by submissions. Examples of topics covered in submissions were:

- Macropod disease
- Total grazing pressure management
- Kangaroo management on reserves
- Extension to harvest areas
- Kangaroo monitoring
- Tag allocation system
- Animal welfare
- Aboriginal participation
- Role of NRM boards.

Comments received were sorted into categories and assigned a proposed response for how it would be incorporated in the final plan. Where it was considered that a comment could not be incorporated into the final plan the comment was noted. Comments were not incorporated in the final plan where they addressed issues beyond the scope of the plan, were already in the plan, offered an open statement, clearly supported the draft proposals, offered an alternative viewpoint and the viewpoint in the draft plan was still considered the best option, were based on incorrect information, contribute options that are not possible, or involve details not appropriate or necessary for inclusion in a document aimed at providing strategic five-year management directions.

Comments were sorted into one of five categories, namely:

1. Information
2. Policies
3. Management strategies
4. Errors
5. Other

A summary of the comments and management plan response follows:

Comment	Number of comments	Response
<u>Information required / more detail required</u>		
Macropod disease.	1	<u>Noted.</u> Plan considered to have appropriate level of detail regarding macropod disease.
Total grazing pressure and land management goals.	3	<u>Amend plan.</u> More detail provided and reference to further information.
Practical details of commercial harvest including permits and licensing.	5	<u>Amend plan.</u> Incorporated information on permit types and conditions.
Monitoring kangaroo populations.	2	<u>Amend plan.</u> Clarification of text and inclusion of links to other places in the plan where monitoring of kangaroo populations discussed.
Kangaroo management in non-commercial harvest areas.	4	<u>Noted.</u> Plan has appropriate level of detail for a strategic document. Specifics of management techniques will be detailed in Non-Commercial Destruction Permit framework which will be available on DEH website once developed.

Background to kangaroo management, eg. Water points, pasture and predation.	2	<u>Amend plan.</u> More detail provided and reference to further information.
Commercially harvested species.	1	<u>Amend plan.</u> Included table on macropod species in SA.
Compliance targets and assessment.	2	<u>Amend plan.</u> Major non-compliance areas listed in plan.
<i>Pastoral Act</i> in relation to Aboriginal use of native species.	1	<u>Noted.</u> Plan lists <i>Pastoral Act</i> and relation to Aboriginal hunting.
Adaptive management trials.	1	<u>Noted.</u> Plan notes that trials linked to quota setting may require approval of the Commonwealth and that these will be detailed in quota proposals.
<u>Policy comments</u>		
Quota setting – support for extending commercial harvest beyond traditional regions.	2	<u>Noted.</u> Quotas are set at sustainable levels. A key outcome of the plan that kangaroos remain a visible component of landscapes.
Quota setting – question logic of reducing quotas during drought when impacts of kangaroos greatest.	1	<u>Noted.</u> Constant proportional harvest remains the quota-setting strategy in the plan.
SA should introduce a minimum carcass weight as per NSW and Qld. 13kg is suggested.	1	<u>Noted.</u> Legislation provides for DEH to introduce a weight limit when considered necessary to ensure the sustainability of harvest – this is not the role of the management plan. <u>Amend plan.</u> Noted that restrictions on quota may include setting a weight limit or closing certain harvest regions.
Tags should be allocated to the Field Processor not the Meat Processor.	1	<u>Noted.</u> This plan notes proposed changes to tag system. Legislative amendments are required before changes introduced.
Non-commercial destruction permits should stop in commercial harvest zones.	1	<u>Noted.</u> Non-Commercial Destruction Permits provide a further management option where commercial harvest is not suitable (e.g. private conservation reserve with a philosophical objection to commercial harvest, situations where industry not financially viable such as localised populations of euros or small kangaroos).
Kangaroo management on reserves – utilisation of the carcasses.	8	<u>Noted.</u> The plan contains appropriate strategic detail on kangaroo management on reserves. More detailed policy related to kangaroo management on reserves will be developed outside this plan.

SA should implement a zero tolerance policy on body-shot kangaroos.	1	<u>Noted.</u> Plan includes a target that will introduce regulatory measures to prohibit the sale of carcasses with a bullet wound in the body (i.e. zero tolerance) by 2009.
Shoot-and-let-lie policy not supported.	2	<u>Noted.</u> Shoot-and-let-lie remains a management option in the plan. Carcass management options for Non-Commercial Destruction Permits will be developed outside of the plan.
Suggest two-part planning process as in last plan – common macropods and threatened macropods – continued in this plan.	2	<u>Noted.</u> Threatened macropods are covered by separate planning processes that involve species-specific recovery plans.
Management strategy comments		
Research linkages required with emphasis on regional level strategies and research partnerships.	4	<u>Amend plan.</u> Noted in plan a need to link with research conducted by other organisations.
DEH should broker an arrangement to get kangaroo industry represented by Meat and Livestock Australia.	1	<u>Noted.</u> This is best progressed outside of the management plan through discussions with Primary Industries and Resources SA.
Effective communication and improved linkages between NRM Boards, landholders and DEH is supported. Encourage DEH to work through regional NRM Boards and groups to ensure that messages have a 'local' flavour.	14	<u>Amend plan.</u> A new objective on partnerships with NRM Boards and Groups under Theme 5. Communication and Education was added to strengthen the importance and role of NRM.
Support for measures which simplify quota setting and tag allocation systems.	3	<u>Amend plan.</u> Forthcoming changes to tag system included in the plan.
Trial of new harvest regions supported. Need engagement of NRM boards and landholders in the development of trials and strategies. Process needs to be simplified.	3	<u>Amend plan.</u> Include that support and engagement of NRM boards and landholders is required for trials. <u>Noted.</u> Process in plan is considered at right level.
Total grazing pressure management should be given more attention in the plan.	5	<u>Amend plan.</u> New strategies added to plan in commercial harvest land management objective.
Landholder role in kangaroo management should be acknowledged.	2	<u>Amend plan.</u> Landholders in kangaroo management amended.

Indigenous Land Use Agreement is a positive approach to deliver sustainable management of kangaroos.	1	<u>Amend plan.</u> Strategy added that embodies this suggestion.
Need to develop a stocking rate for kangaroos on the Fleurieu Peninsula.	1	<u>Noted.</u> It is not the place for this document to set targets related to managing kangaroo impacts at a regional level.
Precautionary approach should be taken in relation to kangaroo management.	2	<u>Noted.</u> The precautionary principle is a principle of the plan.
Adaptive management is important principle of the plan.	2	<u>Noted.</u> Adaptive management and review is a principle of the plan.
Each district should have a kangaroo management plan encompassing all reserves, areas of native vegetation and revegetation areas.	1	<u>Amend plan.</u> Noted in plan that this document is statewide and that regions or districts may benefit from regional plans to help meet specific objectives.
Integrated management requires control of feral animals.	1	<u>Amend plan.</u> Statement added about feral animal control.
Research objective should link with adaptive management.	1	<u>Amend plan.</u> Comment incorporated as suggested.
Carcass management should be built into the Non-Commercial Destruction Permit policy framework.	4	<u>Amend plan.</u> Plan amended to include statement about carcass management.
Need to include monitoring of compliance.	1	<u>Noted.</u> Compliance processes happen outside of the plan.
Add strategy "to ensure that the right technical knowledge is reinforced before a destruction permit is issued."	1	<u>Noted.</u> Plan amended to include further detail on permit requirements and further education material for people shooting under NCDP. Not considered necessary to add it as a strategy.
Competency is an issue for Non-Commercial Destruction Permit.	1	<u>Amend plan.</u> Plan will promote self-assessment of competency and describe other education measures to take place outside of the plan.
NRM principles need to be included as principles of management. Relevant guiding principles in the State NRM plan should be included in this plan.	3	<u>Amend plan.</u> Principles of management amended to ensure that NRM principles (as per the State NRM plan) are adequately incorporated. 'People are the key' and 'Working together' principles added.
If focus of the draft plan is common species, then should include Kangaroo Island Tammar Wallaby.	1	<u>Noted.</u> Plan does not include Kangaroo Island Tammar Wallaby as the focus of the plan is the three commercially harvested species only.

Aerial survey should be extended to cover high value production areas of the State.	1	<u>Amend plan.</u> Plan amended to note that surveys may be required in currently non-monitored parts of the state. The method of survey not specified as it may vary depending upon the location and situation.
Need to include data on non-commercial destruction.	1	<u>Noted.</u> Draft plan includes data on Non-Commercial Destruction Permits.
Kangaroo management on reserves. Neighbouring landholders are first to suffer impacts.	1	<u>Amend plan.</u> Noted that impacts may be at a broader landscape level.
Questions removal of property weighting system employed in current plan and supports weighting systems.	1	<u>Amend plan.</u> Permit and quota tables with more detail have been included in plan.
Plan should state that action may be needed before 'scientific certainty' ascertained; ie precautionary principle.	1	<u>Noted.</u> Precautionary principle is a principle of the plan. Management on parks under review.
Plan should allow for culling in parks that are yet to have reserve management plans in place.	1	<u>Noted.</u> The National Parks and Wildlife Act 1972 sets requirements for culling kangaroos in parks and reserves, not this document.
Goal needs to recognise economic social and environmental objectives.	1	<u>Amend plan.</u> Goal amended to include principles of ecologically sustainable development. Text notes ESD environmental, economic and social objectives and the need to balance these.
Monitoring in non-commercial areas needs more resources.	1	<u>Amend plan.</u> Plan amended to incorporate new strategy.
<u>Errors</u>		
Native Title (SA) Act was reported with incorrect date.	1	<u>Amend plan.</u> Fixed date of legislation.
Incorrect terminology used in Aboriginal involvement section.	2	<u>Amend plan.</u> Replaced with appropriate terms.
Typographical error: No Species Loss 2017-2017.	1	<u>Amend plan.</u> Fixed error (2007-2017).
<u>Other</u>		
An improvement on previous plans.	1	<u>Noted.</u>
Goal of the plan is appropriate.	1	<u>Noted.</u>

The draft plan is a well-written and researched document.	1	<u>Noted.</u>
Support formation of Kangaroo Management Reference Group, and inclusion of RSPCA on this group.	1	<u>Noted.</u>
Consultation with Aboriginal persons and organisations encouraged.	1	<u>Noted.</u>
Broad support for the range of issues identified and proposed management actions.	1	<u>Noted.</u>
Support for maintaining sustainable levels of kangaroos as first objective of the plan.	1	<u>Noted.</u>
Pleased to see that draft plan provides strong endorsement of conservation through sustainable use principles.	1	<u>Noted.</u>
Draft plan should have been an update of last plan, not a total rewrite.	1	<u>Noted.</u>
Encourage the combined endorsement of commercial and non-commercial sections of the plan under the Environment Protection and Biodiversity Conservation Act 1999.	1	<u>Noted.</u> Plan endorsed in whole under the EPBC Act.
Plan does not include Kangaroo Island Western Grey Kangaroo. Desire to develop a management plan for this species.	1	<u>Noted.</u> Not included within this plan as not commercially harvested. DEH will communicate with stakeholder regarding management of kangaroos on Kangaroo Island outside of this management plan process.
Specific editing suggestions.	6	<u>Amend plan.</u> Relevant sections amended.