



SUBMISSION

15 September 2024

Kangaroo Management Program
Department for Environment and Water
By Email: kmp@sa.gov.au

Dear Sir/Madam

Re: Draft South Australian Commercial Kangaroo Management Plan 2025-2029

Livestock SA is the peak industry organisation for South Australia's red meat and wool producers. Representing over 5,200 sheep producers and more than 2,700 beef cattle producers across the state, we work to secure a strong and sustainable livestock sector. South Australia's \$4.3 billion livestock industry is a key economic contributor to the state which supports 21,000 South Australian jobs across the red meat and wool industries.

Livestock SA welcomes the opportunity to provide a submission to the draft South Australian Commercial Kangaroo Management Plan 2025-2029 (the Plan), which is important to our members and industries.

Background

In South Australia, livestock production occurs on over 50 per cent of the state's landmass and occupies about 84 per cent of our agricultural land¹. Since European settlement, kangaroo numbers have increased substantially in South Australia, largely due to increased access to water and grazing land. As such, Livestock SA is vested in the effective management of kangaroos which is critical for environmental management, animal welfare and sustainable livestock production. Effective kangaroo management must include preventing overpopulation, which has occurred in the past and resulted in significant animal welfare and human wellbeing impacts.

Livestock SA supports the responsible management of kangaroos in South Australia and as land managers, red meat and wool producers play a key role in their ongoing management. The recently launched SA Red Meat and Wool Blueprint 2030, which drives the vision of the SA red meat and wool industries, includes the environmental stewardship as a key priority for the industry².

¹ ABS Agricultural Commodities, Australia 2020-21, <https://www.abs.gov.au/statistics/industry/agriculture/agricultural-commodities-australia/2020-21>

² SA Red Meat and Wool Blueprint 2030 <https://livestocksa.org.au/industry-development/industry-blueprint>

We understand that the plan is reviewed and updated every five years to ensure it is based on the best available scientific knowledge and management practices and note that an independent review of the 2020-2024 plan was undertaken as part of this process.

With 37 of the 40 recommendations from the independent review included in the Plan, we have provided feedback to on some specific areas only below.

Ensure humane harvest of kangaroos

Livestock SA support the use of the National Standards and Guidelines for Animal Welfare and the use of scientific decision making for policies and legislation relating to animal welfare. Livestock SA support the use of the Commercial Code for the commercial harvest of kangaroos as it outlines humane methods for destruction of kangaroos and is the nationally endorsed animal welfare standard for kangaroo harvesting.

Livestock SA note the department will support research into improving humanness of kangaroo harvest (Aim 1, Action 2). The SA Red Meat and Wool Blueprint goals include 'Protect animal wellbeing and adopt production practices which have been scientifically proven to minimise pain, injury and distress' and this includes the humane harvest of kangaroos. Therefore, any change in policy relating to humanness of kangaroo harvesting must be scientifically proven to appropriate scientific standards before any changes to legislation or policies are considered.

Additional quotas during population peaks

Livestock SA support additional quotas to be taken during times of population growth. It is imperative to find a balance in the management of kangaroo populations without significant impact on the environment or agricultural production. We support the High Abundance Quota (HAQ) being applied to kangaroo populations when the population estimate is above the population average and the Special Land Management Quota (SLMQ) for when commercial quota has been exhausted and producers are experiencing ongoing kangaroo related land management impacts.

Emergency management response and amendment of harvest quotas

Livestock SA understand that kangaroo populations may be negatively affected during environmental emergencies, such as wide-spread bushfires or floods. As such, we support the consideration of reducing or suspending commercial harvesting in affected harvest sub-regions during and after emergency events. We note that any decision to reduce quota, suspend harvest, or subsequently reinstate harvesting in an affected harvest sub-region, will be informed by a range of factors and request that early communication with industry and permit holders occur to ensure there is a thorough understanding of any changes and fully informed decisions are made.

Expansion of Hills and Fleurieu sub-regions

Livestock SA support the expansion of quotas in the Hills and Fleurieu where the risk of overharvest is low to enable landholders to manage kangaroo populations in these regions.

Commercial Harvesting – tag process

Based on member feedback, Livestock SA is concerned that the administration requirements for acquiring tags are impacting on the ability for harvesters to acquire and use tags and may impact on the number of commercial harvesters available. The current tag use time limits and associated

administration process to acquire and use the tags is not practical. We recommend the department review the effectiveness and efficiency of the current arrangements and consider how to automate this process to reduce the administrative burden to acquire and return tags. The requirements to obtain tags currently do not reflect the reward and price for using them and this is seen as a limiting factor to the availability of commercial harvesters of kangaroos in South Australia.

Commercial Harvesting – realised quota

Under the proportional harvest strategy, quotas are set at a maximum of 20% of the estimated population size of Red Kangaroos, 15% of Western Grey Kangaroos, Eastern Grey Kangaroos and Euros, and 10% of Tamar Wallabies. However, as detailed in the table below, over the last six years a very low percentage of the set quotas have been commercially harvested. From 2018 to 2023, on average only 18 per cent of the set quota was realised.

Quotas

Kangaroo Species	2018	2019	2020	2021	2022	2023
Red	498,800	501,200	277,500	214,100	257,000	338,100
Western Grey	205,400	170,900	177,200	165,100	159,000	221,200
Euro	81,600	80,000	60,300	60,800	27,800	34,900
Eastern Grey			8,300	5,700	8,500	15,100
Tamar Wallaby			9,100	3,500	3,500	24,900
Total	785,800	752,100	532,400	449,200	455,800	634,200

Harvest

Kangaroo Species	2018	2019	2020	2021	2022	2023
Red	74,597	68,711	49,784	41,775	49,371	58,644
Western Grey	26,697	24,565	36,603	42,063	37,064	28,403
Euro	7,247	6,013	4,303	7,918	7,682	6,049
Eastern Grey			8,272	5,633	6,644	7,445
Tamar Wallaby			0	0	135	53
Total	108,541	99,289	98,962	97,389	100,896	100,594

Harvest as a % of Quota **14%** **13%** **19%** **22%** **22%** **16%**

Livestock SA understand that the Plan needs to satisfy a range of requirements including the Australian Government’s *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) as a Wildlife Trade Management Plan, the South Australian Government’s management plan under the *National Parks and Wildlife Act 1972* (NPW Act), and community expectations that kangaroo harvesting methods will not breach the *Animal Welfare Act 1985*. However, implementation of the Plan must also be considered and based on the realised outcomes, it could be considered that the Plan is not delivering against its goal ‘to provide for the sustainable and humane use of kangaroo species’.

Other issues

Livestock SA considers that one of the reasons why the Plan continues to fail to deliver against its targets is because there continues to be a disjointed approach to kangaroo management in the state. While we understand that there are different accountabilities for different roles, responsibilities and activities, the current approach means that the various plans/strategies/targets are not set and measured in a holistic way. A coordinated, solutions focus approach is needed to address what is a difficult ecological, pest management and commercial opportunity issue.

Thank you for the opportunity to provide feedback to the Draft South Australian Commercial Kangaroo Management Plan 2025-2029. Please contact the Livestock SA office on (08) 8297 2299 or via email at admin@livestocksa.org.au if you would like to discuss this submission further.

Yours sincerely



Travis Tobin
Chief Executive Officer