

**81 Morrison Street Kambah ACT 2902**

Mr Mick Gentleman MLA

GPO Box 1020,

Canberra, ACT 2601

Minister for the Environment and Heritage

Dear Mr Gentleman

Thank you for your letter of 20 December 2017, in response to ours regarding CSIRO’s 2014 *Final report for ACT Environment and Sustainable Development Directorate: Relationships between vegetation condition and kangaroo density in lowland grassy ecosystem of the northern Australian capital territory: Analysis of data 2009, 2012 and 2013*, which reveals that the ACT government has no basis in environmental data for killing kangaroos.

You mention that the government is using an adaptive approach to its management of grassy ecosystems. I wish to point out that approaches to management can only be adapted in the light of new information. It appears that the data from the CSIRO study in 2014, showing that kangaroos at densities above two per hectare have no deleterious impact on the ACT’s grassy ecosystems, should, in fact, have required an adaptation of management to desist from killing kangaroos until such time that the data showed otherwise.

You go on to claim that the CSIRO study was restricted in its capacity to infer or predict the effects of higher kangaroos densities (ie >2-3 per hectare) on the floristic values measured. What the study, in fact, says it that it ‘could not identify any upper limit of kangaroo density beyond which vegetation richness, diversity and overall condition declines’, because few sites had kangaroo densities that exceeded 3 per ha. If there were any sites in the ACT where kangaroos were believed to be at higher densities than 3 per hectare, why did the ACT government not collect its data at any such sites? One wonders why ACT public money was spent on such a data collection, if areas believed to be at highest risk were not included.

In fact, the government’s current model for determining desirable kangaroo density is still based on the extraordinarily crude measure of grass consumption, in other words, quantity of grass rather than quality (diversity and richness) of vegetation. This model is clearly inaccurate and grossly inadequate, given that it is the quality of vegetation, not the quantity, which supports and reveals its biodiversity.

I draw to your attention Dr Fletcher’s admission at ACAT 2013 that his suggested ‘one per hectare’ as a desirable maximum number of kangaroos per hectare is nothing but a ‘guess’ with no basis is any science or research. Given that the CSIRO study shows that vegetation benefits from 1-3 kangaroos per hectare, the analysis has clearly proven Dr Fletcher’s guess to be dangerously off the mark.

The CSIRO study was based on data collected by ACT government officers. If this study was unable to determine any negative relationship between kangaroo density and biodiversity, then clearly the ACT govt is unable to do so either. We suggest that, in the absence of any data showing that kangaroos at any density have any deleterious impact on vegetation in the ACT, the precautionary principle should apply and all killing of kangaroos should cease until the impact of **killing kangaroos** on the flora and fauna (including the kangaroos themselves) is known.

On our concerns about the cruelty of the ACT’s annual slaughter, you mention a report on the ACT kangaroos slaughter by an “independent veterinarian”.

This report appears to be irrelevant to our complaint because:

* the report’s findings apply only to the night (presumably only one night) in 2015 when the allegedly independent veterinarian was present, not to the conduct of the slaughter on any other night during any of the other annual slaughters that have taken place between 2009 and the present (obviously the shooters would have been at pains to comply with the code on the night they were under observation);
* the mass orphaning of young at foot during the ACT’s annual slaughter is not open to debate; too many eye witnesses have testified to it;
* the report in no way addresses the cruelty inherent in the Code or Practice with which the ACT government has agreed to comply - a code which permits the bludgeoning to death of pouch young, the orphaning of at-foot young, and the destruction of kangaroo families and social structure.

As the ‘secure nature of eastern grey kangaroo populations’ being evident from the counts published in the *Eastern Grey Kangaroo: Controlled Native Species Native Management Plan*, we note that this Plan is an entirely political document with little or no scientific credibility. Numerous flaws in both the science and the truthfulness of this document were pointed out by many groups and individuals during its public consultation period. This Plan is clearly as inaccurate in its kangaroo counting methods as it is in its conclusion (now refuted by the above-mentioned CSIRO report) that kangaroos in the ACT are having anything but a beneficial impact on the biodiversity of ACT grasslands.

Yours sincerely

Frankie Seymour

Co-founder

25 February 2017