



Key points on the National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Non-commercial Purposes 2008 in relation to the ACT Government's Annual Kangaroo Killing Program

- The ACT Animal Welfare Act (currently) defines a cruelty as “doing, or not doing, something to an animal that causes, or is likely to cause, injury, pain, stress or death to the animal that is unjustifiable, unnecessary or unreasonable in the circumstances”. It defines an animal as any vertebrate animal other than a human. Therefore it includes kangaroos. (The definition also includes certain invertebrates but they are not relevant to this issue.)
- The cruelty offences of the AW Act do not apply to conduct that occurred in accordance with an approved code of conduct (s 20) under section 22. The Code of Practice 2014 (No1) for the shooting of kangaroos in the ACT ((Humane Shooting of Kangaroos and Wallabies) is a legislated disallowable instrument under the Animal Welfare Act. It therefore exempts an act of cruelty to kangaroos from being an offence if the conduct was in accordance with the Code (eg bludgeoning or decapitating pouch joeys).
- Our understanding is that where a person subjects an animal to an act of cruelty that fails to adhere to the relevant Code of Practice, that person has breached the cruelty provisions of the Animal Welfare Act.
- The Code explicitly prohibits shooting a kangaroo unless:
 1. (1) the shooter is able to place a clear shot into the animal’s heart or brain; or
 2. (2) where conditions are such as to raise doubts about achieving a sudden and humane death.
- Rain, high winds, gusty winds, fog and cold conditions are all well established as conditions which affect shooting accuracy:
 - Wind pushes bullets off course. Highly skilled shooters can adjust, to some extent, to steady high winds, but not to unpredictable gusts of blustery wind.
 - Cold air increases air density which slows the velocity of bullets.
 - Cold stress also impacts on the human body, especially in the extremities such as hands. Hand function is very susceptible to cold exposure and affects manual dexterity. This reduces fine motor skills and makes the “feel” for the trigger much less sensitive. Wearing insulated gloves might reduce the impact of cold but it does not negate it.
 - Unpredictable gusts of cooler air causes moment-to-moment changes in air density. Again this makes it difficult for shooters to compensate because they do not know how dense the air is going to be from one moment to the next.



- Wind also hinders visibility in bushland areas where trees that are between the shooters and their targets are in unpredictable motion.
- Rain and fog also hinder visibility, and make guns slippery.
- Blood puddles (as distinct from blood spots and bloody drag marks) indicate that an animal's heart has continued beating after it has been wounded. A heart that has been destroyed stops beating immediately. We have been advised by a medical surgeon (Dr Gwenda Griffiths) who is a member of our group, that even though the heart might continue beating for a few moments after the brain is destroyed, it would not continue beating long enough to pump out over a litre of blood.
- On a night of very gusty winds on 2 July the shooters continued shooting, on West Jerrabomberra Nature Reserve. The next day (3 July), we found a blood puddle containing over a litre of blood on that Reserve, along with four other blood puddles which had either dried out or been cleaned up. The following day, six more blood puddles were found on Red Hill Nature Reserve.
- We wrote to the Conservator, Bren Burkevics, to inform him of this, noting the clauses of the Code which the shooters appeared to be breaching: not shooting when there is uncertainty of achieving a clear head or heart shot; and not shooting in conditions that might compromise ensuring humane death. In an email dated 11 July 2025 (copy attached) the Conservator made the following statement: "Undertaking the conservation cull during all weathers and conditions is normal."

The story in more detail

On the morning of 3 July, three members of the Animal Protectors Alliance attended the West Jerrabomberra Nature Reserve at around 11am, for the purpose of inspecting an area of the reserve where one of us had noticed lights during the shooting on the reserve the previous night.

In the Reserve, that morning, we observed at least three ACT rangers' vehicles and about five ACT rangers in the approximate area we wanted to inspect. The rangers appeared to be cleaning up (shovelling the ground and taking things off the ground and moving them into the vehicles). The rangers left the area as we approached them.

While in the area of the Reserve where the rangers had been, we observed approximately five puddles of blood. These were distinct from blood spots or bloody drag marks which we have routinely observed over many years in nature reserves after kangaroo shooting has taken place. We took photos of the puddles of blood. The first four of these had either almost dried out or been partially cleaned up, but were still easily identified as large blood-stained puddles, rather than spots or drag marks.



At around 12pm that day we found a big double puddle where two puddles were very close together though not quite adjoining. One of these puddles was about 30 cm wide by 35 cm long cm with a spillover blob of blood of about 10 cm by 8 cm on one side. This gives a surface area of roughly 1,130 cm². One of us checked the depth of the puddle with the end of a ball-point pen, close to the edge of this puddle, showing a depth of about 1 cm, giving an estimated volume of around 1.13 litres. Notably, some of the surface area of the congealing blood puddle was hidden by the grass, and the depth would have been reduced by evaporation and seepage into the ground in the 12 or so hours since the previous night's shooting had stopped.

If the adjoining puddle was from the same animal as it struggled to stand and fell to the ground again immediately, the double-puddle might have contained well over two litres of blood from the same animal. We speculated that another reason the puddles were so close together might be that the second puddle was from a joey.

On 4 July 2025, one of the three witnesses from West Jerrabomberra found six more blood puddles on Red Hill Nature Reserve. Additionally, several teeth, still attached to part of a kangaroos jaw was found.