

Submission on the Draft Buru—Eastern Grey Kangaroo Controlled Native Species Management Plan 2025

Animal Liberation ACT



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**Animal Liberation ACT
Submission to the 2025 Public Consultation on the Draft Eastern Grey Kangaroo Controlled Native
Species Management Plan**

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Dear Bren Burkevics,

Submission on the Draft Buru—Eastern Grey Kangaroo Controlled Native Species Management Plan 2025.

Thank you for the opportunity to provide comments on the Draft Buru—Eastern Grey Kangaroo Controlled Native Species Management Plan December 2025.

About Animal Liberation ACT

Animal Liberation ACT is an Australian animal rights organisation dedicated to ending all human activity that harms nonhuman animals. Grounded in an anti-speciesist and anti-anthropocentric ethic, we advocate for all animals as sentient individuals with inherent rights and value, not resources to be managed or controlled for human priorities. Our work challenges the systems and assumptions that normalise violence toward nonhuman animals, whether in agriculture, research, entertainment, or wildlife “management.”

As an incorporated association, Animal Liberation ACT is governed by an elected committee and represents a community of members dedicated to exposing and resisting the systems that make violence against animals appear necessary, routine, or natural. In this submission, we speak from that commitment, centering the rights and lived experiences of nonhuman animals whose interests are most affected yet least considered in policy decisions.

Foundational Ethical Objection

Animal Liberation ACT rejects the fundamental premise of the Draft Plan—that Eastern Grey Kangaroos must be killed—and calls for an immediate end to the killing of Eastern Greys in the ACT. Our position is grounded in an animal rights framework, which recognises that sentient beings have intrinsic value and a fundamental interest in continuing their lives (Regan, 2004; Francione, 2008). From this perspective, the deliberate killing of healthy kangaroos is not a matter of “management” but a violation of their basic rights as individuals. Yet the plan normalises the deliberate killing of healthy, sentient individuals as routine “management,” embedding lethal control as an

unquestioned, year-on-year practice rather than a genuine last resort. Once killing becomes business-as-usual, the ethical question of whether it is acceptable to end the lives of sentient wildlife is effectively removed from consideration; killing is simply normalised as routine management.

The Draft Plan does not interrogate this core injustice. Instead, it concentrates on refining the efficiency and administration of killing - through codes of practice, shooter testing, veterinary oversight, and research into so-called “humane” methods for killing pouch young. Such regulatory adjustments may alter how kangaroos die, but they do nothing to justify that they are being killed at all. As animal rights scholars argue, improving the conditions under which harm occurs does not address the moral illegitimacy of the harm itself (Francione, 2008). No amount of procedural refinement can transform an ethically indefensible practice into one that is legitimate or acceptable.

Demonising Language and Problematic Framing of Kangaroos

Although the Draft Plan, drawing on Legge’s (2024, p.107) recommendations and the International Wildlife Control Principles advises against “negatively labelling kangaroos”, the document repeatedly does precisely this. Under the guise of “justification for control,” kangaroos are characterised as posing “significant detrimental impacts” on people, property, livelihoods, ecosystems, and other animals - value (ACT Government, 2025a, p.71) a sweeping set of claims that casts kangaroos as a problem species rather than native wildlife with intrinsic

It further argues that killing kangaroos is necessary so future human generations can enjoy “the diversity of the natural world” and to prevent the “erosion of Country for Indigenous Australians” (ACT Government, 2025a, p.71). This claim is fundamentally inconsistent with ecological and cultural history. Eastern Grey Kangaroos have lived on this continent for millions of years, and alongside First Nations peoples, shaping landscapes along with other wildlife without causing the alleged forms of “erosion” the plan now attributes to them (Dawson, 2002; Uncle Max Harrison, 2021).

To argue that the ongoing presence of a native species threatens Country, or the ability of future generations to experience biodiversity, is not only illogical but also dangerously distorts ecological and cultural history, creating a narrative in which native wildlife are recast as threats to the very landscapes they have co-evolved with for millennia (Boom et al, 2012).

Likewise, framing kangaroos as undermining the “economic viability” of farms casts native animals as economic adversaries, rather than as wildlife with intrinsic value and longstanding ecological roles (Drew, 2017). These narratives construct kangaroos as

problem animals, ecological villains and financial burdens, priming readers to view their killing as inevitable or ethically justified (Drew, 2017). Such rhetoric distorts ecological reality, undermines the status of kangaroos as native wildlife, and functions to legitimise their destruction rather than support coexistence.

Critique of key conceptual frameworks in the Draft Plan

Before turning to specific operational and welfare concerns, it is important to address several overarching conceptual frameworks that underpin and shape the Draft Plan. These concepts, presented as ethical, scientific, or welfare-oriented, play a central role in legitimising lethal management while obscuring the violence it entails. Rather than opening space for meaningful ethical deliberation (as advocated by the UTS Centre for Compassionate Conservation, 2025), the use of these frameworks narrows it, creating the impression of principled, balanced decision-making while closing down alternatives that do not involve killing. Rather than opening ethical debate, the plan actively closes it down.

Misuse of “Welfare” and “Ethical” Language

The Draft Plan draws on the international principles for ethical wildlife control (Legge, 2024), welfare rhetoric, and procedural language that suggests care and responsibility. Yet these terms are used to sanitise the deliberate killing of healthy, sentient animals. This stands in direct contrast to the UTS Centre for Compassionate Conservation (2025), whose goal is to “bring compassion for individuals into conservation decision-making and shift conservation practices from a species-centric approach to one that values individual lives and their intrinsic worth and rights.” By framing lethal control as “humane,” “ethical,” or “responsible,” the Plan cloaks violence in the language of compassion.

Sentience and “One Welfare” Are Acknowledged, Then Abandoned

The Draft Plan acknowledges animal sentience and cites the ACT’s adoption of a One Welfare framework, yet these commitments are used to justify killing rather than reduce it. Instead of starting from the principle that sentient beings have an inherent interest in continuing to live (Bekoff, 2024), the Plan weighs kangaroo welfare against grass metrics, economic considerations, and human convenience.

This instrumentalises kangaroo lives and repurposes welfare language to support lethal management. A genuine One Welfare approach would begin by asking how harm to kangaroos themselves can be minimized, not how their deaths can be better rationalised. Deploying One Welfare in this manner distorts its intended function and risks transforming a compassionate framework into a tool that legitimises violence. A

genuine One Welfare approach would prioritise preventing harm to kangaroos themselves, not perfecting the rationale for their deaths.

Scientism, the “God-Trick,” and the Illusion of Objectivity

A core problem with the Draft Management Plan is its uncritical reliance on scientism - the belief that its decisions are grounded in neutral, value-free “objective” science - when in reality its knowledge base is deeply situated, partial, and shaped by institutional power. Donna Haraway’s (1988) work helps reveal this contradiction. She argues that scientific knowledge is never neutral or detached; it is always shaped by the institutions, technologies, assumptions, and power structures that produce it.

This is a direct challenge to scientism, the belief that science alone can deliver neutral, value-free truth because it shows that what counts as “science” is itself socially and politically situated. In the context of kangaroo management, this means the Plan’s reliance on narrow government-funded research networks is not simply a matter of evidence, but of perspective and institutional interests, a paradigm into which they have locked themselves. Even the endangered or threatened species they purport to care about are, in the Plan, mere pawns in a human-centric game cloaked as science.

By presenting kangaroo killing as a technical, “rational” necessity, the Plan performs what Donna Haraway (1988) calls the “god-trick”: pretending to speak from nowhere while actually operating from within a closed system that already assumes kangaroos are a problem. In this process, kangaroos are reduced to numbers, density targets, grazing pressure, population models, while their lived experience and agency disappear.

Crucially, Donna Haraway (1988) argues that there is no such thing as neutral or “true” objectivity. All knowledge is partial, situated, and shaped by the standpoint from which it is produced (Haraway, 1988). The only meaningful form of objectivity is one that openly acknowledges its values, limits, and positionality. The Draft Plan does not do this. Instead, it masks value-laden decisions about which lives matter, which harms count, and whose voices are heard as if they were scientific facts. This is not objective science; it is scientised justification.

Response to the Draft Plan’s Stated Outcomes:

Outcome 1:

The management of Buru in the ACT meets high animal welfare standards

1.1 Why Lethal Control Cannot Meet “High Welfare” Standards

The claim that lethal kangaroo management meets “high animal welfare standards” is disingenuous because killing kangaroos does not constitute a welfare outcome.

Welfare, even in its most basic definition - “the health, happiness and fortunes of a group” (Oxford Learners Dictionary, 2025) - cannot be reconciled with the deliberate killing of that group’s members.

This contradiction is further underscored by s. 4A of the *Animal Welfare Act 1992* (ACT), which recognises animals as sentient beings with intrinsic value who “deserve to be treated with compassion” and whose welfare people have a duty to protect. The Act also defines cruelty to include causing injury, pain, stress, or death when such harm is ‘unjustifiable, unnecessary or unreasonable’ (*Animal Welfare Act 1992* (ACT), s. 6A).

Framing the killing of healthy, sentient kangaroos, including females with dependent young, as a “high welfare” outcome disregards these legislative principles and ignores the inevitable suffering associated with lethal control. Procedural refinements cannot overcome the basic ethical and legal contradiction: killing is the negation of welfare, not an expression of it.

1.2 Exclusion of Pouch Young and Young at Foot ‘Ghost Population’

The Draft Plan excludes pouch young from the numbers authorised for killing, justifying this omission on the grounds that pouch young are difficult to detect at young ages and variable in number (ACT Government, 2025a). In plain terms, the Government does not count joeys because they are hard to see, their survival varies, and officials claim they cannot predict how many females killed will be carrying young.

This exclusion artificially lowers the reported scale of killing and disregards a significant proportion of the population affected. In the 2025 cull, for example, 2,981 kangaroos were reported killed, yet an additional 1,194 pouch young were also killed, and the number of orphaned young-at-foot (who are not recorded at all) remains completely unknown.

While the number of pouch young killed is reported retrospectively, these deaths are not included in the official cull figures, giving the public a misleading impression of the scale and impact of the killing program.

Government reports claim there is no “ghost population” of joeys orphaned during the cull, yet this is directly contradicted by evidence given in the ACAT challenge in 2014 by Animal Liberation ACT (ACT Civil and Administrative Tribunal, 2014). Under cross-examination, Dr George Wilson admitted that an entire “ghost” population of at-foot

joey is orphaned by the slaughter every year (ACT Civil and Administrative Tribunal, 2014).

These dependent young, still reliant on milk and highly vulnerable, face extreme stress and an almost certain death in the wild (Ben-Ami et al., 2014; Mjadwesch, 2011). Treating the deaths of pouch young and young-at-foot as statistically inconvenient does not diminish their welfare significance; it exposes a major ethical and methodological flaw in the Plan's approach.

The requirement that shooters "must be certain" each kangaroo is dead before targeting another (DCCEEW, 2021) relies entirely on trust. No independent observers are present, and veterinarians used are people that already support the cull and cannot reasonably be considered impartial monitors of animal welfare outcomes (Ben-Ami et al., 2011).

Building on these concerns, the treatment of joeys under the National Code of Practice for the humane shooting of kangaroos and wallabies for non-commercial purposes raises further serious welfare issues (DCCEEW, 2021). The Code requires pouch joeys to be killed with a forceful blow to the head and at-foot joeys to be shot in the head or heart; however, there is no independent evidence that these procedures are carried out consistently or humanely in practice (Ben-Ami, 2014).

In the absence of external oversight, the fate of these young animals remains largely undocumented. We remain deeply concerned that pouch joeys may be buried alive in pits when shooters fail to check pouches (as noted above, even the Draft Plan acknowledges that pouch young are excluded from the numbers authorised for killing because they are "difficult to detect"; ACT Government, 2025a), and we therefore conclude that at-foot joeys - smaller targets and more difficult to locate in the dark - are at high risk of being mis-shot, missed entirely, or left to die from starvation, exposure, or predation.

The lack of independent monitoring means that the suffering of these young kangaroos is not only predictable but effectively rendered invisible within the current management framework.

1.3 Significant Unknowns and Welfare Risks

There are significant unknowns and well-documented risks associated with the assumption that kangaroos are consistently killed instantaneously with a single headshot.

Although the government emphasises licensed and "highly trained" shooters, the practical realities of night-time field conditions make accurate headshots far from

guaranteed. A kangaroo's head is a small and constantly moving target, and even slight, often imperceptible movements could result in shots striking the jaw, neck, shoulder, or body instead of the brain.

Independent veterinary audits conducted between 2013 and 2023 have repeatedly documented mis-shooting and a range of other serious welfare breaches, including kangaroos being shot in the body and lost, and dependent pouch young left alive and not humanely killed (see Kangaroo Conservation Cull Animal Welfare Assessment 2013; 2015; 2017; 2023). These failures demonstrate that the risks are not hypothetical but are real and occurring, even under conditions where shooters know they are being observed.

Across multiple independent veterinary audits (2013–2023), several consistent welfare failures have been documented:

- **Failure to ensure instantaneous death.**
Audits in 2015, 2017 and 2023 did not record 100% instantaneous deaths. In most years, animals were missed, wounded, or not rendered immediately insensible - and even a single delayed death undermines any claim of “high welfare standards.”
- **Kangaroos requiring multiple shots.**
Documented in every audit year (2013, 2015, 2017, 2023). In 2017 alone, three kangaroos required follow-up shots after not being killed immediately.
- **Wounded kangaroos escaping and not being found.**
Recorded in 2017 and 2023, with two kangaroos each year escaping while injured - resulting in prolonged, unobserved suffering.
- **Shooters/Rangers failing to locate kangaroos they have killed.**
In 2015, five “dead” kangaroos could not be found, making pouch-young euthanasia impossible. The Code requires female kangaroos to be examined immediately for pouch young. Yet the independent vet recorded shooters failing to locate five kangaroos. If shooters cannot even find the animals they kill, they cannot euthanise the young - leaving joeys to die from starvation, exposure, or predation.
- **Dependent young always suffer and die**
In 2013, 40% of killed females were lactating, but joey recovery did not match this. Many young were unaccounted for, and shooters even missed live joeys in pouches - including three furless joeys found alive and still attached to the teat,

having been incorrectly assumed dead. The 2013 report admits shooters failed to check essential indicators of death (heartbeat, corneal reflex). In 2015, one young-at-foot was shot in the chest took five seconds to become insensible. In 2023, a furred, mobile, semi-independent joey escaped and could not be found, and would have likely died from starvation.

- **Protocols do not protect animals; they only document failures**

Even with reported “full compliance,” animals still suffered, experienced delayed deaths, and were missed entirely. In reality, “full compliance” is doubtful: in 2013, three live joeys were found in pouches after shooters had supposedly checked them, and the vet confirmed only partial compliance. In 2023, a pouch young escaped and was never found.

- **Male kangaroos**

The 2017 audit notes that male kangaroos were less likely to be rendered immediately insensible than females. This raises questions about shooter accuracy, target visibility, anatomy, and ethical oversight, none of which are addressed.

- **Cruelty normalised through language**

Serious welfare failures are framed as “minor” or “adverse events,” masking systemic issues.

- **Independent oversight is rare**

These failures occur even when independent observers are present; when oversight is absent - as it is for most of the season - welfare breaches are likely far worse.

- **Historical evidence of mis-shooting.**

Kangaroo bodies exhumed in 2012 showed bullet wounds to the body rather than required headshots, and one female’s head had been crushed post-mortem (Nicholson 2012).

Taken together, the evidence presented above leads to the following conclusion.

The government’s own veterinary audits prove that lethal control cannot be made humane in theory or in practice; it inevitably causes suffering, error, and harm - and no regulatory framework can eliminate these risks.

These findings directly contradict assurances that all kangaroos are killed humanely and without error. Moreover, independent vet audits are the only times these issues are

documented, meaning we have no publicly available evidence on how often shooters use secondary shots or the true rate of wounding during the rest of the season.

In the absence of such data, claims of consistently high animal welfare standards remain unsubstantiated. Any animal who is not immediately killed will experience significant pain, fear, and distress - outcomes fundamentally incompatible with the Draft Plan's stated welfare commitments.

Given these findings, the Draft Plan provides no evidence that the government actually implements or monitors compliance with the veterinary recommendations made each year.

This leads to two very important, though unanswered questions:

- 1. How are these recommendations communicated to shooters?*
- 2. Is there any proof they are adopted, audited, or enforced in subsequent seasons?*

Without transparent reporting, follow-up assessments, or public documentation of corrective actions, the community has no way of knowing whether these welfare failures are being addressed at all. In the absence of such evidence, assurances of "continuous improvement" remain unverified and cannot be taken as credible.

1.4 GonaCon

The Government's justification for the use of GonaCon is framed almost entirely around population-modelling outputs and management efficiency. We are told that rendering approximately 70% of female kangaroos infertile will reduce the need for future culling, produce long-term cost savings, and limit the number of animals "subject to a management action" (ACT Government, 2025a).

However, this framing treats fertility control as a neutral management tool rather than what it truly is: a profound, invasive intervention on sentient individuals – a pre-emptive strike on the future of the species.

The Draft Plan treats GonaCon as a routine "management tool," yet permanent fertility suppression is an extreme intervention with lifelong consequences for the individual animal. GonaCon can effectively eliminate an entire reproductive lifetime.

If GonaCon suppresses fertility for eight years or more, many female kangaroos will never reproduce in their lifetime. This is especially significant given that, as Mjadwesch (2011) notes, "Even though a female kangaroo can have eight young in her lifecycle" on average over eight years "at least 75% of her joeys are likely to die, which means only two will survive into adulthood, and possibly only one of these might be a female."

Given the mortality rate of young kangaroos, the ethical implications of permanently removing an individual's reproductive capacity for 8 years (the average life span of a female kangaroo) are not acknowledged anywhere in the plan.

From an animal-welfare and ethical standpoint, this intervention serves human management goals - not the interests or wellbeing of the doe herself. In human ethics, imposing lifelong infertility without consent would be understood as a serious violation of bodily autonomy (Office of the United Nations High Commissioner for Human Rights, 2023).

It is unclear why a different moral standard should apply simply because the individuals in question are kangaroos. Animal Liberation ACT rejects this anthropocentric double standard and maintains that reproductive autonomy and bodily integrity are morally relevant for all sentient beings.

Furthermore, the argument that GonaCon will "reduce the need for culling" is deeply flawed. The program can only be applied after populations have already been reduced through culling, meaning lethal control remains structurally embedded.

This creates a circular justification in which killing is defended by the promise of future reductions in killing, despite the requirement for ongoing doses to maintain roughly 70% infertility across treated sites.

The claim of long-term reduction in intervention is therefore misleading, particularly given that no evidence has been provided to show any actual decline in population numbers attributable to fertility control to date. Indeed, government representatives themselves have now said culling will always be part of their management plan (ACT Government, 2025a).

Finally, the model assumes that fertility control is appropriate in small, bounded populations but offers no meaningful ecological or welfare analysis of the social, behavioural, or long-term health impacts on the kangaroos themselves. Reducing animals to variables in a population model overlooks their lived experience and intrinsic value as sentient individuals.

In our view, a program that permanently removes reproductive capacity from the majority of female kangaroos, while still relying on continued culling, cannot be credibly described as humane, ethical, or aligned with the ACT's legislated commitment to animal sentience and One Welfare principles.

1.5 Kangaroo wellbeing is erased rather than examined.

Despite claiming to value kangaroos, the ACT's ecological assessments never examine

their wellbeing. There is no monitoring of stress, displacement, injury, family disruption, or the long-term impacts of repeated culling on social groups.

Kangaroos' lived experience - their fear, bonding, movement patterns, and social structures - is entirely absent from the science that purports to justify killing them.

This omission is striking given clear evidence presented to the 'New South Wales Inquiry into the Health and Wellbeing of Kangaroos and Other Macropods', where Dr Croft (THINKK) testified that kangaroos are highly social, culturally complex beings whose mobs maintain distinct cultural practices passed between generations, and that shooting disrupts these structures so severely that juveniles stop playing and mother-daughter relationships break down (NSW Inquiry, 2021).

Professor David Brooks further explained that kangaroos experience complex grief, and that the impacts of killing on their "physical and psychic health" are profound (NSW Inquiry, 2021).

By ignoring this well-documented evidence of emotional and social depth, the Draft Plan reduces kangaroos to ecological units rather than sentient individuals, making it easier to rationalise their deaths while erasing the very forms of wellbeing that contemporary welfare science recognises as essential.

Recommendations

1. **Cease describing lethal control as an animal-welfare outcome**, as this is inconsistent with the ACT Animal Welfare Act 1992.
2. **Include all dependent young and pouch young in official cull numbers at the time the cull is announced, using estimation methods where exact counts are not possible**, to ensure that the true scale and welfare impact of killing is transparently and accurately represented.
3. **Ensure genuine transparency by mandating the timely public release of all ACT Government veterinary welfare reports, independent audits, and related data.** This should include:
 - *publication of the ACT Government's annual October "kill report" (by the ACT Government Veterinarian) with clear documentation of how its recommendations will be incorporated into subsequent programs;*
 - *annual publication of all welfare findings, rather than the current three-year cycle for independent audits, which is insufficient to detect recurring welfare failures;*

and

- *accessible, centralised reporting so the community can verify whether welfare breaches are addressed and whether recommended improvements are actually implemented.*
- 4. **Implement genuinely independent welfare monitoring during all shooting operations, conducted by observers with no institutional, professional, or ideological alignment with lethal wildlife management.** The current model where an “independent” veterinary audit occurs only once every three years and is conducted by individuals or organisations that openly support the cull, cannot be considered independent oversight. Continuous, real-time monitoring by auditors who have no prior involvement with ACT Government kangaroo programs, no professional investment in lethal control, and no conflict of interest is essential to ensure credible welfare accountability.
- 5. **Cease the use of GonaCon entirely**, and commission an independent ethical review to assess its impacts on reproductive autonomy, long-term wellbeing, behaviour, and social structure.
- 6. **Require comprehensive welfare and wellbeing assessments that recognise kangaroos as sentient individuals, not merely ecological units.** This must include systematic monitoring of stress, displacement, injury, social disruption, and the long-term impacts of repeated culling on family groups and mob dynamics. Without integrating these measures into all ecological assessments, the ACT Government cannot claim to value kangaroos or meet its legislated obligations toward animal sentience.

Outcome 2:

Populations of Buru remain a significant part of the fauna of the ‘bush capital’ and a component of the grassy ecosystems of the ACT.

2.1 Fundamental contradiction - a stated commitment to maintaining kangaroo populations while actively reducing them

The claim that Buru will “remain a significant part of the fauna of the bush capital” (ACT Government, 2025a) is fundamentally contradicted by the scale and trajectory of the ACT Government’s lethal and fertility-suppression programs. In practice, the Government is not maintaining kangaroo populations, it is systematically reducing

them. This year alone, internal recommendations suggested killing approximately 6,000 kangaroos, a staggering number that would have been carried out had it not been constrained by cost, resourcing, and practical limitations rather than ecological necessity.

At the same time, the plan proposes expanding fertility control across multiple sites with the stated aim of rendering up to 70% of all females infertile (ACT Government, 2025a), a level of reproductive suppression unprecedented in native wildlife management. These combined strategies, large-scale culling and long-term fertility suppression, cannot plausibly be reconciled with the stated goal of ensuring kangaroos remain abundant or ecologically significant within the ACT.

Instead, they represent an increasingly interventionist population-reduction agenda that treats kangaroos not as valued members of the “bush capital,” but as a problem to be continuously diminished. The Outcome’s wording is therefore misleading: the ecologists and Government actions reveal a commitment to severely reducing kangaroo populations, not maintaining them.

2.2 Kangaroos killed for development

The Draft Plan’s discussion of urban development exposes a major contradiction in the ACT Government’s long-standing public claim that kangaroos are *not* culled due to development pressures. The Plan explicitly states that Buru “should” be culled in development areas to prevent road trauma, dog attacks, starvation or supposed “additional grazing pressure” on nearby grassy ecosystems. This is a direct admission that lethal control is being used as a tool to facilitate urban expansion, despite years of assurances that kangaroo killing is not linked to development.

The framing is particularly troubling given that it is human activity, clearing, fragmentation, fencing, and construction that disrupts habitat and forces kangaroos into dangerous, high-risk spaces. Rather than requiring developers to avoid harm, maintain habitat connectivity, or implement non-lethal relocation and mitigation strategies, the Plan proposes killing resident kangaroos as the preferred solution. This shifts responsibility for development-driven impacts away from planners and developers and onto the kangaroos themselves, effectively treating them as obstacles to construction rather than native inhabitants with strong site fidelity and legitimate claims to the landscape.

Recommendation

- 1. Cease all population-reduction measures, including mass culling and large-scale fertility suppression** because they are fundamentally incompatible with the stated goal of maintaining kangaroos as a significant and enduring part of the

ACT's fauna.

2. **The ACT Government must prohibit the use of lethal control in response to urban development** and instead require developers to implement non-lethal coexistence measures including habitat corridors, staged construction, relocation to safe areas, reduced speed zones, and exclusion of kangaroos from construction sites, ensuring that kangaroos are not killed to clear land for human expansion.

Outcome 3 – Buru populations are maintained at densities that result in a heterogeneous pasture structure that provides suitable habitat conditions to support a wide variety of plant and animal species.

3.1 Failure to Demonstrate Any Biodiversity Benefit From 15+ Years of Culling

A fundamental problem with the ACT Government's approach is that, despite more than 15 years of annual kangaroo killing, there is still no published, peer-reviewed evidence demonstrating that culling has improved biodiversity outcomes at specific nature reserves. This absence of proof is not an oversight – it is explicitly acknowledged within the plan itself, which concedes that “further work is planned to assess the outcomes for plant and animal species” (ACT Government, 2025a).

In other words, the Government continues to kill thousands of kangaroos annually without having ever produced evidence that this repeated killing has delivered ecological benefits at the specific reserves where it is routinely conducted. Species such as the Grassland Earless Dragon are repeatedly cited as being at risk from kangaroo “overgrazing” (Allen, 2016), yet this species persists only in Majura Valley, Jerrabomberra Valley and parts of Queanbeyan, and remains critically endangered (ACT Government, 2025b), despite more than a decade of culling in those same landscapes.

This absence of demonstrated ecological benefit is even more concerning in light of broader conservation trends: as at 2023, the ACT recorded eight critically endangered, 21 endangered, 28 vulnerable and one regionally conservation-dependent species, with six additional species uplisted during the reporting period and only one moved to a lower threat status (Lewis, 2023). These figures underscore that biodiversity decline continues unchanged despite ongoing kangaroo killing, further calling into question the rationale and effectiveness of the Government's approach.

This lack of demonstrated benefit becomes even more problematic when the Government's own restoration efforts are examined. Even the government's own efforts

in Canberra Nature Parks to reverse the effects of historic heavy livestock grazing and supposed ongoing kangaroo grazing, show only modest recovery of grazing-sensitive species, and document a perennial flora that is resistant to change, even after four years of favourable rainfall and reduced grazing pressure (Gordon et al., 2021).

Gordon et al (2021) also notes that localised species losses would likely be permanent within the fragmented grassy ecosystems of Canberra Nature Parks thus one questions the logic of continued kangaroo killing if this is indeed the case.

These concerns are reinforced by findings from a CSIRO study of North Canberra woodlands (Vivian & Godfrey, 2014). The researchers were unable to identify any upper kangaroo density threshold beyond which vegetation richness, diversity or condition declined, nor could they determine an “optimal” kangaroo density for biodiversity (Vivian & Godfrey, 2014).

In fact, richness and diversity tended to be highest when at least some kangaroos were present, and year-to-year variation in vegetation structure was driven more by climate than by kangaroo numbers (Vivian & Godfrey, 2014).

Crucially, the authors note that the correlative nature of the study and major confounding factors - including land-use history, site productivity, livestock grazing and rabbits - make it impossible to attribute vegetation outcomes specifically to kangaroo densities (Vivian & Godfrey, 2014). This directly undermines the Draft Plan’s presumption that kangaroos are a primary ecological threat requiring continuous population reduction.

Together, these findings expose a profound evidentiary gap in the Government’s justification for lethal management. After more than a decade of repeated culling at ACT nature reserves, the Government has still failed to demonstrate any measurable ecological benefit for plant or animal species. This raises the obvious and devastating question: why does the killing continue when its effectiveness has never been proven?

3.2 Sources and “independence” significantly questionable

A critical weakness in the ACT Government’s kangaroo management rationale is that the research base used to justify claims of biodiversity harm is extraordinarily thin and often speculative, and circular. As demonstrated in a recent doctoral analysis by Dr Kathleen Varvaro (2025), key documents such as Frawley’s 2009 assessment tables (e.g., Table 3.4) present what appears at first glance to be an alarming list of vulnerable species allegedly threatened by kangaroo grazing.

Yet closer inspection reveals that these claims are overwhelmingly unsupported. For nearly every species cited, Frawley (2009) explicitly notes there is “*no evidence,*” “*studies are lacking,*” “*not known,*” or “*little is known,*” but nevertheless proceeds to

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infer impacts using highly tentative language such as “*suggests*,” “*appears to*,” “*possible*,” “*likely*,” “*may be*,” and “*could contribute to*” (Vavaro, 2025).

The only species for which grazing was identified as *not* currently a threat, the Tarengo leek orchid, was still inexplicably included. Despite these clear limitations, this 2009 document continues to be repeatedly referenced (Vavaro, 2025) as if it provides definitive ecological evidence, even though no substantial new data has been produced to validate its claims.

This pattern demonstrates that the ecological case for lethal management relies not on demonstrated, measurable harm caused by kangaroos, but on speculation and precautionary assumptions recycled over more than a decade. In effect, kangaroos are being killed based on hypothetical impacts rather than robust, empirical evidence - an approach that fails both scientific standards and ethical scrutiny.

The leap from speculation to policy becomes even more concerning when the eight so-called “key” papers underpinning the ACT Government’s biodiversity claims are examined closely. As Dr Brooks (2024) demonstrates, these papers provide neither independent authority nor convincing ecological justification for lethal management: several were unpublished or not peer-reviewed when first used to legitimise the cull, while others were co-authored by the ACT Government’s own Senior Ecologist or by researchers funded through ACT Government partnerships, creating a closed authorship network centred on CSIRO, the Fenner School and the University of Canberra.

These studies are limited to specific experimental patches and cannot be generalised across all ACT reserves, yet the Government treats them as definitive evidence. The study by Howland et al (2015) exemplifies this problem. Although the paper concludes with a recommendation to keep kangaroo densities below 1.2 kangaroos per hectare, this figure is not an empirically validated ecological threshold but a management suggestion derived from narrow site conditions.

The legless lizard species persisted at sites with up to 5 kangaroos per hectare (Howland et al, 2015), and the study did not demonstrate causal harm from higher kangaroo densities; instead, habitat condition was driven primarily by rainfall, historic grazing, fragmentation and soil processes. Despite these limitations, the ACT Government has inflated this tentative recommendation into rigid culling targets - as low as 0.1 kangaroos/ha in some habitats - misusing limited research to justify extensive population suppression.

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Taken together, these methodological weaknesses reveal that the Government's evidence base functions less as independent science and more as a self-reinforcing justification loop for ongoing killing.

The echo chamber does not end with the eight papers; it permeates nearly every piece of research the plan cites to justify killing kangaroos. The ACT Government's reliance on a small, internally linked group of researchers - most prominently Snape, O'Loughlin, Wimpenny and colleagues - raises substantial concerns about the independence and credibility of the evidence base.

Snape, whose work is cited extensively to assess kangaroo grazing impacts, is employed by the ACT Government itself, meaning their research cannot be considered independent of the agency that commissions, funds and operationalises the cull. O'Loughlin and Wimpenny likewise produce studies funded by, partnered with, or co-authored alongside Directorate staff, forming a closed research loop in which government-aligned authors repeatedly validate one another's conclusions.

As Dr Varvaro (2025) demonstrates in her doctoral thesis, when management plans then cite this material as external scientific authority, the effect is circular: the Government uses its own employees' and collaborators' work to legitimise its own policies, while excluding genuinely independent ecological assessments.

This pattern reflects what citation scholars describe as a distorted citation network. Citation is both a scholarly method and a social practice, and as Greenberg (2009) argues, biased or repetitive citation can create "information cascades" that manufacture unfounded authority.

McLaren and Bruner (2021) similarly note that knowledge is socially constructed through citation practices that shape how research is framed, interpreted, and legitimised. In this case, a narrow and interconnected authorship network has been amplified through selective citation to construct the appearance of scientific consensus where none exists. Such practices fall short of the standards of independence and rigour required for decisions involving the large-scale killing of native wildlife.

This pattern of non-independence reaches its most concerning expression in the appointment of Dr Sarah Legge, whose affiliations clearly align her with lethal-control advocacy. Dr Sarah Legge is publicly identified as one of "our people" on the Invasive Species Council's website - an organisation whose core mission centres on promoting the "control" of so-called invasive species, a framework that overwhelmingly defaults to killing as the primary management tool.

Her long-standing professional ties to the ANU Fenner School similarly place her within academic and institutional networks that have consistently endorsed lethal wildlife management. These affiliations mean her appointment cannot credibly be viewed as neutral or independent of the ACT Government's existing policy direction.

Compounding this, peer review offers little assurance of objectivity when reviewers themselves operate within the same funding structures and ideological paradigms that normalise the routine killing of sentient native animals. Taken together, these factors demonstrate that the review reflects not an unbiased assessment of the evidence, but the perspective of institutions already aligned with the Government's preferred lethal management narrative.

3.3 Arbitrary Grass-Height Targets and Circular Logic Used to Justify Lethal Control

A central flaw in the Plan is its reliance on a circular and scientifically weak grazing framework that allows lethal intervention under any environmental condition. The plan selectively presents both *under-grazing* and *over-grazing* as ecological threats, creating a justification loop in which kangaroo killing is warranted whether grass is tall, short, abundant, sparse, wet, dry, native, or exotic. This enables culling to proceed irrespective of actual ecological need.

Compounding this is the "safe operating environment" for grass height - an arbitrary and unproven range of 5–12 cm - treated as if it were a biologically validated threshold. The research underpinning this range is narrow, conditional, and far from demonstrating that maintaining grass at precisely these heights produces superior outcomes for threatened species when compared with non-lethal management methods.

In fact, the scientific foundations of this metric have been directly challenged. During the 2009 ACT Administrative Appeals Tribunal hearings, ecologist Dr Dan Ramp testified that the government's method for determining "overgrazing" based on grass mass, vegetation height, or ground cover was *not* an accepted ecological approach for assessing kangaroo impacts on grassland health or wildlife interactions (Taylor, 2021).

Plant scientists similarly noted that vegetation height has meaning primarily in cropping systems, not complex native grasslands (Taylor, 2021). Despite this, the plan continues to elevate grass height measurements - an unreliable and contextually inappropriate metric - into the primary justification for lethal kangaroo management.

This weak scientific basis raises serious concerns about the validity, ethics, and necessity of an entire management regime built upon such flawed assumptions.

3.4. Human-caused Impacts Are Being Displaced onto Kangaroos

The Draft Plan consistently displaces the consequences of human land degradation onto kangaroos. ACT reserves are already heavily altered by fragmentation, historic livestock grazing, exotic pasture dominance and repeated burning (ACT Government, 2025a), yet the Plan positions kangaroos, rather than these well-documented human impacts, as the primary disturbance requiring perpetual population control.

This framing directly contradicts the ACT Government's own ecological assessments. Habitat fragmentation was formally listed as a key threatening process in 2019, with Lewis (2023) arguing that we need to prohibit development activities that further damage threatened species and ecological communities. Lewis (2023) also calls for integrating biodiversity into all new suburbs through planned habitat patches - an acknowledgement that land-use decisions drive ecological decline.

Despite this, the Draft Plan attributes structural grassland changes primarily to kangaroo grazing while ignoring the dominant forces such as development activities shaping these landscapes. The emphasis on achieving a "heterogeneous pasture structure" functions as an attempt to correct human-created ecological damage, yet only kangaroos are penalised for conditions produced by urban expansion, colonial land-use practices, and decades of environmental mismanagement.

By displacing the responsibility of human impacts on the reserves onto a native species and treating kangaroos as ecological pests within landscapes fundamentally shaped by people, the plan entrenches a management framework built on misplaced blame rather than sound ecological reasoning.

Recommendations

- 1. Explicitly recognise human-caused land degradation as the primary ecological driver of reserve habitat damage and the resultant threatened species problem, rather than attributing these impacts to kangaroos.** Fragmentation, livestock history, burning regimes, exotic grass dominance and development - not kangaroo grazing - are the major pressures on ACT reserves. Action must begin by addressing these causes, not displacing blame onto wildlife.
- 2. Commission a truly independent ecological review unconnected to ACT Government staff, funding, or longstanding pro-culling networks.** Research produced by government employees, government-funded researchers, or institutions aligned with lethal wildlife management does not constitute an independent evidence base. A new review must be led by ecologists,

conservation biologists, and animal welfare scientists with *no institutional conflict of interest*.

3. **Replace five-year evaluation cycles with genuine, continuous ecological monitoring.** Because grasslands and kangaroo populations fluctuate, five-year reviews are scientifically incapable of informing responsible management. Annual or seasonal public reporting is essential and must not be tied to lethal intervention.
4. **Prioritise non-lethal care-based approaches as the default, not the alternative.** Methods such as habitat restoration, erosion control, strategic weed management, and grassland rehabilitation should form the basis of reserve care. Kangaroos should be integrated into ecological processes, not treated as threats.
5. **Embed kangaroo wellbeing - stress, social disruption, displacement, fear responses into ecological assessments.** Kangaroos are sentient beings, not ecological units. Any plan must assess and prioritise their wellbeing as integral to ethical conservation.

Outcome 4

Ngunnawal values and knowledge are incorporated into Buru management programs in the ACT.

While the Plan claims to incorporate Ngunnawal values and knowledge, its reliance on lethal control fundamentally contradicts the principles of reciprocity, respect and coexistence that underpin Indigenous custodianship. The use of Ngunnawal language (including the term *Buru*) to describe or legitimise the killing of kangaroos is ethically troubling. It risks becoming a form of cultural appropriation in which the language of care is mobilised to sanitise and humanise a violent, colonial act: the bureaucratic removal and destruction of Country's own kin (Montford and Taylor, 2020).

This practice functions as Indigenous-washing, borrowing cultural terminology to mask the continuation of Western ecological control systems that prioritise domination, suppression, and "management" of living beings. As scholars of Critical Animal Studies note, the use of animals and the institution of speciesism have long been integral to colonisation, with nonhuman animals routinely killed to advance colonial ends (Montford and Taylor, 2020).

The Yui Declaration for Kangaroos further demonstrates that Indigenous nations articulate clear principles of respect, lore, and sovereign rights for kangaroos - principles fundamentally incompatible with lethal management (Harrison, 2021).

Authentic Ngunnawal, or Ngambri knowledge cannot meaningfully coexist with industrialised killing framed as conservation, because such killing is embedded in settler-colonial governance rather than Indigenous ecological ethics. Using cultural language to soften or conceal harm not only undermines the integrity of Indigenous knowledge systems but also perpetuates the very colonial logic that dispossessed both people and wildlife from their homelands.

Ethical incorporation of Indigenous values requires transforming management practices - not using cultural terminology to legitimise the harm those practices inflict.

Recommendation

1. **Reject the use of Ngunnawal language to legitimise a Western, colonial “management” framework that relies on domination and killing.** Instead, establish a genuinely Ngunnawal-led cultural governance process that replaces Western wildlife control models with Indigenous principles of reciprocity, kinship, and coexistence - principles fundamentally incompatible with industrialised killing.

Outcome 5

Buru populations on rural properties and horse paddocks are maintained at densities that do not seriously impact the economic viability of the land.

Outcome 5 entrenches a model in which native kangaroos are managed primarily as obstacles to agricultural productivity rather than as sentient wildlife or integral components of rural ecosystems. By framing kangaroo presence in terms of “economic viability,” the Plan shifts away from ecological science and into market-driven wildlife management, effectively allowing private landholders’ commercial interests to dictate kangaroo density targets.

The activities listed under this outcome reveal a system designed to streamline and normalise private-sector killing: administrative support to “efficiently” apply for authorisations, a Rural Culling Calculator to generate quotas, annual shooter testing, and routine communication to ensure landholders meet their obligations. Notably, the five-year evaluation focuses only on landholder *satisfaction*, not ecological outcomes -

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underscoring that this is a customer-service model for facilitating lethal control rather than a conservation program.

Transparency is further undermined by the refusal to release property-level culling data, preventing independent scrutiny of scale, impacts, or justification. Coordinated killing across tenures simply extends this framework, embedding kangaroo suppression as standard practice without demonstrated ecological need.

Compounding these issues is the Plan's uncritical assertion that kangaroos threaten agricultural productivity through competition with livestock - a claim that is not only scientifically unsubstantiated but directly contradicted by the ecological literature and by the ACT Government's own findings. As Dawson (2012) notes, competition between kangaroos and domestic stock is "notoriously hard to demonstrate" in natural conditions, and work by Boom et al (2012) suggests the answer to whether kangaroos impair livestock productivity is essentially no.

Caughley's analysis, also cited in Dawson (2012), further argues that during drought, sheep have greater negative effects on kangaroos than kangaroos have on sheep. Even more telling, the ACT Government's own plan states that Eastern Grey Kangaroos have different feeding preferences to livestock (ACT Government, 2025a), fundamentally undermining the premise of direct competition for forage. If kangaroos and livestock do not target the same food resources, the central economic argument collapses.

Yet the Plan treats competition not as a hypothesis requiring evidence, but as an unquestioned fact - while selectively ignoring research, including its own, that contradicts the narrative used to justify lethal control. In this context, Outcome 5 appears less about ecological necessity and more about legitimising the ongoing killing of native wildlife for agricultural convenience.

A further and deeply consequential problem is that there is no empirical dataset capable of demonstrating whether rural kangaroo culling achieves its stated objective of protecting economic viability. As the Environment, Planning and Sustainable Development Directorate (EPSDD) [review itself](#) concedes, "There are no data available on spatial and temporal changes in kangaroo density on rural land...[and] no data on changes in livestock density, or pasture condition (if these data exist)" (p.66).

It further acknowledges that "Given the paucity of data on kangaroo densities on rural land, it is difficult to evaluate the impacts of the rural cull...[and] the Review is not aware of any data on pasture condition or total grazing pressure on rural lands" (EPSDD, 2020, p.73). In other words, the ACT Government authorises and facilitates large-scale killing on private land without measuring kangaroo numbers, livestock pressure, pasture health, or economic outcomes - the very metrics required to justify lethal control.

The only figures systematically recorded are the number of kangaroos authorised to be shot and the number reported as killed, which reflect only weather-driven fluctuations, not evidence of competition or productivity impacts. Despite this profound data vacuum, property-level quotas continue to rely on the Rural Cull Calculator, a tool operating without any empirical grounding.

This means the entire rural-culling regime is built not on demonstrated need or measurable impact, but on assumptions, perceptions, and administrative convenience. Without baseline data, monitoring, or outcome evaluation, it is scientifically indefensible to claim that rural culling protects productivity, and ethically indefensible to continue killing native wildlife under the guise of an unproven benefit.

The Draft Plan's inclusion of horse paddocks under Outcome 5 rests on an unexamined assumption that kangaroos somehow threaten pasture availability or horse welfare through "overgrazing." Yet there is no published research demonstrating that kangaroos negatively affect horses, horse health, pasture quality, or paddock condition in equestrian settings.

A search of the scientific literature reveals studies on livestock–kangaroo interactions, but no empirical work on kangaroos in horse paddocks in the ACT. The Government provides no references nor evidence of competition. This is consistent with the Plan's broader pattern: invoking "overgrazing" as a universal justification for killing kangaroos, even in contexts where the concept has not been defined, tested, or meaningfully applied.

In others, the ACT Government appears to have simply transferred assumptions from livestock systems onto equestrian properties without investigating whether these assumptions are relevant. In effect, the Plan legitimises shooting kangaroos on horse agistment land based on a generalised ecological cliché rather than demonstrated need - an approach that is not only unscientific but ethically indefensible.

Recommendations

- 1. End the killing of kangaroos on rural properties and horse paddocks.** Lethal control for private economic convenience is ethically indefensible. Kangaroos are sentient beings with intrinsic value, protected under the ACT Animal Welfare Act's recognition of sentience. No economic argument, particularly one with no evidence can justify taking their lives.
- 2. Remove "economic viability" as a justification for harming wildlife.** A native animal's right to exist must not be subordinate to private commercial interests. Public wildlife should not be killed to support private profit, landholder

preference, or agricultural productivity. Ethical policy must prohibit the framing of wildlife as economic obstacles.

3. Ensure transparency: publish all rural and horse-paddock authorisations and outcomes.

Transparency is a minimum ethical obligation.

The public has the right to know:

- how many are killed
- where killing occurs
- how many kangaroos are shot (on rural land and horse paddocks)

Currently, secrecy shields the state and farmers from accountability while wildlife bear the consequences.

Outcome 6

Buru carcasses resulting from culling activities are utilised to reduce waste and benefit the environment and community

The activities listed under Outcome 6 appear, on the surface, to promote “waste reduction” and “community benefit,” but they in fact establish the policy architecture for a commercial or semi-commercial kangaroo industry in the ACT. Activity N.1 formalises the use of kangaroo carcasses for predator bait production (ACT Government, 2025a), embedding kangaroo killing within broader lethal wildlife programs and strengthening interlinked systems of harm.

Activity N.2 (ACT Government, 2025a) which allocates carcasses to the Ngunnawal community upon request, risks positioning cultural use as a mechanism to legitimise ongoing culling - rather than addressing the core ethical issue of whether these animals should be killed in the first place.

Activity N.3 (ACT Government, 2025a) expands carcass use to research institutions, again normalising the framing of kangaroo bodies as consumable material.

The most concerning step, however, appears in Interim Outcome O, which mandates a detailed investigation into “additional carcass utilisation options” recommended by the AWS (2020) report (ACT Government, 2025a). This includes engaging consultants, estimating costs, and explicitly tracking the ‘proportion of carcasses used for new purposes.’ This is the exact developmental pathway that precedes commercialisation: establishing feasibility studies, building economic models, and creating expectations that carcasses must be processed, utilised, and justified through new markets.

Once these pathways are built, there will be structural pressure to maintain or increase culling numbers to supply the utilisation system. In effect, Outcome 6 shifts kangaroo management from a stated conservation activity to the beginnings of a resource extraction model.

It treats kangaroo bodies as commodities, not sentient native animals, and paves the way for a de facto commercial kangaroo industry without community consultation or social licence. Far from reducing harm, these activities risk embedding lethal management as economically desirable and politically entrenched - making it harder, not easier, to transition toward humane, non-lethal approaches in the future.

Recommendations

1. Remove Outcome 6 entirely and prohibit all forms of carcass utilisation.

Using the bodies of killed kangaroos for bait, research, cultural allocation, or “new markets” entrenches killing as beneficial and desirable.

No wildlife management plan committed to animal welfare or ethical governance should institutionalise pathways that normalise or incentivise killing.

2. Reject carcass use for bait programs. Producing baits extends harm beyond kangaroos by feeding other lethal programs (fox/dingo control), reinforcing a violent wildlife management paradigm. Non-lethal coexistence strategies must replace interlinked killing systems.

3. Reframe wildlife management toward protecting living kangaroos, not utilising dead ones. The Plan should commit to:

- eliminating the production of carcasses
- investing solely in non-lethal approaches
- recognising kangaroos as sentient beings, not resources

Any framework that seeks to “use” kangaroo bodies fundamentally contradicts stated commitments to welfare and sentience.

Outcome 7

The incidence of vehicle-Buru collisions is reduced in the ACT

7.1 Misdiagnosing Roadkill as a Kangaroo-Density Problem

Outcome 7 frames vehicle–kangaroo collisions as an issue linked to “Buru abundance,” yet the Government’s own data clearly shows that roadkill risk is driven primarily by *road design, vehicle speed, traffic volume, lighting, vegetation structure, and seasonal or*

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climatic factors - not kangaroo population density. This is reinforced by decades of global road-ecology research: wildlife–vehicle collisions occur wherever fast roads intersect habitat, regardless of population size.

Despite this, the Plan repeatedly implies a density-based causation, subtly reinforcing the narrative that fewer kangaroos would reduce collisions, while simultaneously stating that the ACT Government “does not cull Buru to reduce collisions” (ACT Government, 2025a). This contradiction reveals an underlying logic that connects road safety to kangaroo numbers without formally acknowledging it.

The Plan also highlights alarming roadkill statistics up to an estimated 5,800 kangaroos killed annually yet treats this as an ecological mortality issue rather than a failure of human infrastructure. No ecological species would be considered “overabundant” simply because roads kill them; the roads are the problem, not the animals.

While the Plan recognises fencing, underpasses, signage, and emerging technology as the key solutions, it admits that evaluation of these measures is “minimal” (ACT Government, 2025a). This raises an uncomfortable question: why has lethal management received long-term investment and institutional infrastructure, while proven roadkill mitigation technologies have not been properly trialled, funded, or evaluated? The proposed reliance on consultants and future funding bids further delays action on readily available solutions that jurisdictions worldwide already use effectively.

Fundamentally, Outcome 7 misdiagnoses a human-made problem as a wildlife problem. Instead of acknowledging that roadkill is a direct consequence of high-speed roads cutting through kangaroo habitat, the Plan subtly reinforces the framing that kangaroo density is a contributory factor. This risks entrenching a narrative that quietly links culling to road safety, even if not stated outright. A genuine road-safety strategy would prioritise infrastructure redesign, enforced speed reductions in known hotspots, wildlife crossings, verge management, driver education, and deployment of proven animal-detection systems, not blaming kangaroos for attempting to move across their own Country.

Despite these concerns, it is positive that the Draft Plan acknowledges the need for a multidisciplinary, well-funded road-ecology strategy. The commitment to developing a strategic program that reviews emerging mitigation technologies, identifies knowledge gaps, and involves road-safety staff, scientists, rangers, animal-welfare groups and medical practitioners is a constructive step forward. However, to be meaningful, this commitment must be matched by resourcing, transparent evaluation, and an explicit recognition that infrastructure (not kangaroo density) is the primary driver of collisions.

7.2 Ban on Rehabilitating Joeys Contradicts Welfare Obligations

The ACT Government's refusal to allow the rehabilitation and release of orphaned joeys, particularly those injured or displaced in vehicle collisions, stands in direct contradiction to Outcome 7's stated goal of reducing harm to kangaroos. Every year, dozens of pouch young and at-foot joeys survive car strikes only to be legally barred from receiving the long-term care that trained wildlife carers are ready and willing to provide. Instead, these young animals are routinely killed, not because rehabilitation is impossible, but because ACT policy forbids it.

This prohibition is ethically indefensible. Joeys injured in vehicle collisions are direct victims of human infrastructure, yet the Government denies them the most basic welfare response: rescue, treatment, and release. The rationale offered, claiming Eastern Grey Kangaroos are "abundant," that joeys may later pose management problems, or that hand-reared animals may habituate to humans rests on outdated assumptions and ignores decades of advances in wildlife rehabilitation, soft-release techniques, and post-release monitoring.

Importantly, this prohibition is not standard practice nationally: neighboring New South Wales permits the rehabilitation and release of injured and orphaned joeys under the Code of Practice for Injured, Sick and Orphaned Protected Fauna (NSW Government, 2011), demonstrating that safe, ethical rehabilitation frameworks already exist and function effectively.

The ban also erases the profound ethical commitment of wildlife carers, who provide specialised, unpaid, life-saving care out of compassion rather than conservation accounting. Preventing the rehabilitation of orphaned joeys reduces sentient individuals to population units and denies them the chance to live simply because their survival does not serve government management goals.

From an animal-rights standpoint, this position is indefensible. If the ACT Government is genuinely concerned about the welfare impacts of vehicle collisions, as Outcome 7 claims, then denying care to the young kangaroos harmed by those collisions contradicts its own stated objectives. Public confidence cannot be maintained when the Government's response to injured wildlife is not rescue but routine killing.

7.3 Inconsistencies Between Stated Goals and On-Ground Welfare Practices

Outcome 7 presents itself as a strategy to reduce kangaroo harm, yet the refusal to invest properly in roadkill mitigation technologies, the reliance on density-based assumptions, and the prohibition on rehabilitating joeys all reinforce a management system that prioritises administrative convenience over genuine welfare outcomes. The Government cannot credibly commit to reducing vehicle-related mortality while

simultaneously denying care to the very animals harmed by roads and restricting proven mitigation methods. Genuine public confidence requires transparent evaluation, non-lethal management, and an ethical commitment to protecting individual lives, not policies that normalise their preventable deaths.

Recommendations

- 1. Explicitly remove kangaroo population density from the road-safety narrative.** The Plan must acknowledge that roadkill is driven by road design, vehicle speed, and habitat fragmentation - not by the number of kangaroos present. Any implication that reducing kangaroo densities is a road-safety strategy should be removed to avoid reinforcing a scientifically incorrect and ethically harmful justification for lethal control.
- 2. Invest in proven, non-lethal roadkill mitigation technologies as the primary intervention.** Allocate dedicated funding for evidence-based measures such as wildlife underpasses and overpasses, trial and evaluate Virtual Fencing or hotspot-specific speed reductions. These interventions are internationally recognised as the most effective way to reduce wildlife–vehicle collisions.
- 3. Embed animal-welfare and First Nations groups in all road-ecology planning and implementation.** Ensure that animal-welfare organisations, Nggunawal representatives, and independent ecologists are equal partners in designing, trialling and evaluating mitigation measures. This is necessary for a humane, culturally respectful, and community-supported approach to reducing collisions.
- 4. Recognise roadkill as an infrastructure failure, not a wildlife problem.** Formally adopt a policy principle that wildlife–vehicle collisions result from road design, vehicle behaviour, and human planning decisions. This principle should guide all future interventions and ensure that kangaroos are not scapegoated for attempting to move through their own habitat.
- 5. Lift the ban on rehabilitating and releasing orphaned or injured joeys** and establish a licensed, welfare-centred rehabilitation pathway developed in collaboration with wildlife carers, veterinarians, and animal-protection groups, to ensure young kangaroos are given every opportunity to survive rather than being automatically killed.

Outcome 8

Public confidence in Buru management programs is maintained through clear and transparent communication.

8.1 Transparency Undermined by FOI Restrictions, Legal Barriers, and Controlled Communication

Outcome 8 claims that “public confidence” will be maintained through clear and transparent communication, yet the ACT Government’s own administration of Freedom of Information (FOI) law directly contradicts this. “Bren Burkevics (2023, 2025), Executive Group Manager of the ACT Environment, Heritage and Parks Division, has refused sections of applications. To do so, he invoked Schedule 1 of the FOI Act 2016 - ‘information disclosure of which is taken to be contrary to the public interest’ - specifically section 1.14 relating to ‘law enforcement or public safety information.’” (Vavaro, 2025, p. 318).

As demonstrated, requests for basic information have been repeatedly heavily redacted. In his FOI decision letters, Burkevics (2023; 2025) justified these refusals by invoking Schedule 1 of the FOI Act 2016 and citing an “extended history of protest activity” as grounds to treat disclosure as a public safety risk - an argument analysed critically in Vavaro’s (2025, p. 318) work. This approach frames democratic participation as a threat and enables the withholding of information that is essential for public oversight. As Vavaro (2025) demonstrates, such refusals do not simply limit transparency; they protect the operational interests tied to kangaroo killing while foreclosing scrutiny of decision-making frameworks.

This pattern must be read within the broader legal shifts documented in Vavaro’s (2025) research. Amendments to the Nature Conservation Act 2014 removed ACAT review of kangaroo-management decisions, eliminating a key avenue for independent oversight (Vavaro, 2025). With the ACAT review foreclosed, FOI becomes the *only* remaining mechanism through which the public can access information not published by government - yet FOI requests are being restricted in ways that undermine genuine accountability. This is incompatible with both the FOI Act’s stated objectives and the ACT Government’s own commitments to “open government.”

In practice, the Government’s communication strategy functions unidirectionally: information is selectively disseminated to bolster existing management choices, while mechanisms that enable challenge or scrutiny are restricted. As Vavaro’s (2025) research argues, this reflects a shift away from Public Values Management - which prioritises transparency, participation, and accountability and toward a New Public

Management logic that protects internal operations, controls information flows, and manages public perception. Public confidence **cannot** be “maintained” through curated messaging while simultaneously obstructing FOI access and eliminating external review pathways.

Ultimately, Outcome 8 presents only the *appearance* of transparency. In reality, FOI restrictions, removal of ACAT review, curated communication, and structurally limited avenues for public input all indicate that the ACT Government’s commitment to openness is minimal. This significantly undermines the credibility of the Kangaroo management program and erodes the very public trust the Plan claims to uphold.

8.2 The Plan Claims Community Engagement While Silencing and Criminalising Dissenting Voices

The Draft Plan’s claim that public confidence will be maintained through “clear and transparent communication” (ACT Government, 2025a) sits in stark contrast to the ACT Government’s documented history of suppressing dissent and foreclosing democratic participation regarding kangaroo management. As Vavaro’s (2025) institutional ethnography demonstrates, legislative changes introduced by Minister Corbell to the *Nature Conservation Act 1980*, and later entrenched in the wholly revised *Nature Conservation Act 2014*, expanded strict and absolute liability offences in ways that effectively criminalised protest, restricted public challenge, and breached fundamental human rights protections under the *Human Rights Act 2004*.

Although these reforms were presented as enhancing transparency and public participation, Vavaro’s (2025, p.329) analysis shows that they operated as what she terms an “accountability circuit,” whereby government officials, ACAT Presidents, and Ministers upheld only the appearance of openness while structurally disabling meaningful scrutiny. Decisions by ACAT President Bill Stefaniak and Minister Corbell simultaneously claimed to promote “open government” yet systematically excluded those wishing to challenge kangaroo killing, rendering dissent punishable under a vastly expanded suite of offences (Vavaro, 2025).

These findings directly undermine Outcome 8’s assurance that community voices will be incorporated: the legal architecture governing kangaroo management has historically been designed not to facilitate engagement, but to silence, criminalise, and administratively remove opposing voices. A plan cannot credibly promise transparency while operating within, and benefiting from, systems that restrict democratic participation and penalise dissent.

The Plan further asserts that the ACT Government (2025a) is “committed to understand and incorporate community concerns and opinions,” yet the practical experiences of

community stakeholders reveal a very different reality. Consultation has been selectively restricted, with dissenting or critical voices routinely excluded.

For example, after one meeting with community advocates in 2023, no further discussions were permitted, effectively closing off dialogue after a single controlled interaction. Other stakeholders have been warned they would be removed from contact lists if they continued raising concerns in a recurring or critical capacity.

This pattern of exclusion is further reinforced by the Plan's stated intention to "align more closely with other ACT Government Plans to engage with volunteers," which in practice means engaging only with volunteer groups whose views align with the Government's narrative. Animal rights volunteers, who hold some of the most consistent welfare concerns are not engaged, invited, or acknowledged, despite their long-term involvement and expertise.

The Government's reliance on curated surveys and controlled communication channels cannot compensate for this absence of genuine dialogue. The claim that the Plan meaningfully incorporates community perspectives is therefore misleading: supportive voices are welcomed, while critical ones are silenced, marginalised, or administratively excluded. Such practices fundamentally undermine the credibility of Outcome 8 and contradict the principles of open government and democratic participation that the ACT claims to uphold.

8.3 Failure to Address Weather-Related Welfare Risks Undermines Outcome 8

Outcome 8 claims that public confidence will be maintained, yet serious welfare concerns raised during the 2025 kill season, such as shooting in excessive high-wind conditions, are routinely dismissed or contradicted by official statements. High winds significantly impair shooting accuracy and increase the risk of wounding, making it a clear breach of the Code of Practice.

At **Red Hill on Tuesday 1 July 2025**, multiple witnesses from Save Canberra's Kangaroos documented strong winds and gunfire continuing well past midnight. Despite this, the Conservator of Flora and Fauna informed activists that operations had ceased due to wind and crews had relocated, a claim inconsistent with on-ground observations. Police presence at approximately 2:00am further highlights discrepancies in the official account.

When community-observed welfare breaches are met with contradictory or incomplete explanations, transparency is compromised and public confidence cannot be maintained. Ignoring or denying these incidents directly contradicts the intent of Outcome 8 and erodes trust in the Government's assurance of humane and accountable operations.

8.4 Lack of Transparency Around Drone Use and the Expansion of Surveillance Technologies

The use of drones during the cull season represents a major transparency gap that directly undermines Outcome 8. There has been no public communication explaining why drones are deployed, what footage is captured, how long it is stored, or who has access. On 2 July at Aranda Bushland Nature Reserve, the Conservator stated that drones are used for “operational purposes” and “situational awareness.”

While drones may assist with logistics, they also introduce a significant surveillance dimension, particularly given the long-standing pattern of intense monitoring of animal advocates by the Directorate. Drones are capable of capturing high-resolution video and images, raising urgent questions:

- What exactly are these drones recording?
- Is footage of peaceful observers being collected and stored?
- Could this material be used to build cases against individuals lawfully documenting public-interest matters?

Research in civil liberties and protest surveillance warns that drone use by government agencies can chill participation, create perceptions of intimidation, and expand policing powers without adequate oversight (Aston, 2017). Liberty – the UK’s largest civil liberties organisation has campaigned extensively against the use of such technologies to monitor protests (Liberty, 2025). Experts consistently recommend clear ethical frameworks, transparency in data collection and retention, and public consultation before drones are deployed in sensitive contexts such as protest activity.

In the absence of such guidelines, the use of drones during kangaroo killing operations poses serious risks to privacy, democratic rights, and public trust. Normalising drone surveillance under the banner of “safety” sets a concerning precedent, not only for animal advocates in the ACT, but for any community group engaged in peaceful observation or protest. This lack of transparency stands in direct contradiction to Outcome 8’s commitment to clear and open communication.

8.5 When and where shooting is occurring on any given night.

A further barrier to transparency is the withholding of basic information about when and where shooting is occurring on any given night. While the Government may view this as operationally insignificant, the consistent refusal to disclose shooting locations in real time or even on the day itself has serious implications for public trust and safety. Communities living adjacent to reserves, recreational users, walkers, dog owners, wildlife carers, and animal advocates all have legitimate reasons to know when lethal

operations are underway. Withholding this information is not a neutral administrative choice - it is a deliberate strategy that prevents independent observation, limits public oversight, and exposes residents and animals to unnecessary risk. In the context of Outcome 8 and its commitment to “clear and transparent communication,” the ongoing secrecy around shooting schedules is fundamentally inconsistent with genuine accountability.

8.6 Lack of Transparency in Reporting Kangaroo Management Units (KMUs)

The use of Kangaroo Management Units (KMUs) in public reporting is highly misleading and undermines the transparency promised under Outcome 8. The Government routinely reports that a certain number of kangaroos were killed “in” a specific KMU, for example, “X kangaroos in the East Jerrabomberra KMU” or “X kangaroos in the Aranda–Painter KMU” - yet a KMU is not only a reserve. It is an administrative boundary that combines multiple land parcels, including reserves, adjacent paddocks, leasehold areas, and undeveloped land.

As a result, the public is given the false impression that large populations of kangaroos exist *within* particular reserves, when in reality many, such as those attributed to the Aranda Bushland KMU - are killed outside the reserve, in adjoining paddocks or peri-urban land.

This lack of clarity denies the community the right to know exactly where kangaroos are being shot and how many are being killed at each specific reserve or land parcel. It also obscures the true ecological context by masking the fact that some reserves host only small resident populations while most of the killing occurs on neighbouring lands.

Furthermore, senior officials often report kill numbers only at the KMU level without specifying the breakdown across individual areas, nor do they explain where KMU boundaries lie. This practice is not transparent; it is obfuscating.

The public cannot meaningfully assess or scrutinise the scale, location, or justification of killing when the reporting aggregates multiple sites into a single administrative unit and presents it as if it were a single contiguous reserve. A transparent system would disclose precise kill numbers for each reserve, each adjacent parcel, and each non-reserve site - anything less misleads the community and erodes public trust.

Recommendations:

- 1. Restore genuine oversight by reinstating independent review mechanisms, including access to ACAT.** Public confidence cannot be maintained while decisions are insulated from external scrutiny. Re-establishing independent review is essential to prevent conflicts of interest and unchecked bureaucratic

authority.

2. **Reform the FOI process to ensure that information necessary for public accountability is not withheld under broad or misapplied “public safety” exemptions.** FOI decisions related to kangaroo management must default to disclosure, not secrecy, and must not treat democratic participation as a risk warranting suppression.
3. **Publish all operational reports in full and without redactions.** Transparency requires the release of substantive evidence - not curated summaries or selectively presented material.
4. **Cease the practice of excluding dissenting community voices from consultation processes.** Stakeholders must not be removed from contact lists, denied further meetings, or otherwise silenced because they hold critical or rights-based perspectives. A legitimate engagement framework must include those who oppose lethal control.
5. **Introduce mandatory public disclosure of nightly shooting locations and times, with real-time updates.** This is essential for community safety, independent observation, wildlife carers, and public oversight. Withholding this information is incompatible with transparency.
6. **Suspend the use of drones until an ethical framework is publicly established and approved following community consultation.**
This framework must clarify: what is captured, how footage is stored, who has access, how long it is retained, and strict prohibitions on surveillance of peaceful observers.
7. **Develop a clear, public code of practice governing all surveillance technologies used during management operations.**
This must include safeguards against the monitoring of activists, observers, residents, and peaceful protesters, recognising drone surveillance can have a chilling effect on democratic participation.
8. **Create an independent monitoring body to oversee animal welfare compliance during culling seasons.**
This body must be external to the Directorate, must report publicly, and must have the authority to document and publish welfare breaches—including those

related to weather, mis-shooting, and operational conditions.

9. **Commit to transparent, non-leading, methodologically valid community surveys that reflect Canberra’s demographic profile.**

Surveys used to claim “public confidence” must avoid leading questions, quota-skewed sampling and assumptions about knowledge or support for culling.

10. **Require the ACT Government to report kangaroo-kill numbers by each individual reserve and each individual adjoining land parcel, rather than aggregated across Kangaroo Management Units.** KMU reporting obscures where killing actually occurs, misrepresents reserve populations, and prevents the public from understanding the true scale and location of harm to sentient wildlife.

Analysis of the Evaluation and Reporting Schedule

The Evaluation and Reporting Schedule on closer examination suffers from fundamental methodological shortcomings that undermine its credibility and its capacity to support transparent, evidence-based decision-making. The design of the schedule ensures neither timeliness nor transparency, nor methodological adequacy.

- **Five-year evaluation cycles are scientifically indefensible.**

The Plan mandates five-year reviews for assessing the effectiveness of both culling and fertility control, despite the fact that kangaroo populations, grass biomass, vegetation structure, fire regimes, rainfall patterns, livestock pressure, and road-collision dynamics fluctuate on monthly to seasonal timescales. A five-year interval cannot detect meaningful ecological changes in real time, nor correct harmful interventions promptly. This timeline renders the “adaptive management” framework largely illusory.

- **Welfare oversight is infrequent, non-independent, and methodologically incapable of detecting harm.**

The only so-called independent veterinary audit occurs once every three years, is conducted by individuals who already support lethal control, and examines only a tiny sample of shooting activity. Jordan Hampton from Ecotone Wildlife Veterinary Services has written nearly all of the independent audit reports, and he is also a co-author of an article which agrees with killing of animals ‘*Ethical Arguments that Support Intentional Animal Killing*’. There is no methodology to quantify wounding rates, mis-shots, prolonged deaths, orphaned young-at-foot, sub-lethal injuries, or failures that occur when observers are not present. Such a

framework is structurally incapable of identifying the real welfare cost of the kangaroo kill.

- **Critical data required for meaningful evaluation are not collected.**

Despite the scale of killing, the schedule does not commit to measuring or reporting:

- the number of dependent young who die as a result of culling
- the number of animals mis-shot or wounded
- the true rate of secondary shots
- population structure, dispersal, or social disruption
- biodiversity outcomes beyond grass height
- cumulative impacts of annual culling on kangaroos

Without these data, claims about “effectiveness,” “high welfare standards,” or “ecological necessity” remain unsubstantiated.

- **Key reports remain internal and are not published, undermining**

transparency. The Rural Culling Audit, full ACT Government veterinary welfare reports and operational details are withheld from public release. Selective publication is not transparency; it is controlled communication. The public cannot meaningfully scrutinise management without full disclosure.

- **Fertility-control evaluation omits welfare and behavioural impacts.** The five-year review of GonaCon assesses only population suppression and cost - not welfare effects, behavioural changes, physiological consequences, or disruptions to kangaroo social structures. This is a significant methodological omission, especially given global concerns about long-term welfare impacts of immunocontraceptive programs.

- The 2022 Micromex survey suffers from significant methodological weaknesses that undermine its credibility as evidence of “community support” for kangaroo killing. First, the survey relies on a telephone sample of 605 residents, including numbers harvested from past research. Telephone surveys are well-documented to over-sample older, retired, politically conservative respondents and under-sample younger people, renters, and mobile-only households - biases especially relevant in Canberra’s population profile (ABS, 2023). Without quotas aligned to ABS benchmarks or any investigation into non-response bias (ABS, 2023), the sample cannot be assumed to reflect public opinion.

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- Moreover, a sample of just 605 respondents in a jurisdiction of more than 450,000 residents cannot legitimately be extrapolated to represent community attitudes, particularly when the sampling frame itself is skewed. The small sample size amplifies the underlying methodological flaws. This is further compounded by the fact that the survey's reported margin of error of $\pm 4\%$ is only valid for random, representative samples (conditions not met here) meaning the true uncertainty may be considerably higher and the reported figures misleading.

Of concern is the survey instrument itself. Numerous questions are leading, assume prior knowledge that most respondents do not have, or embed government messaging directly into the wording.

For example, asking *"How satisfied are you with the ACT Government's current management of kangaroos?"* presupposes that respondents are familiar with management practices - yet neither the survey nor the government provides accessible information about welfare breaches, joey mortality, mis-shooting rates or independent audit findings.

Similarly, asking participants to compare kangaroo "concentration" in the ACT to "Australia generally" is meaningless without data, and invites uninformed speculation shaped by media stereotypes rather than evidence.

Several questions explicitly prime respondents in favour of culling. The item *"In comparison to other methods by which humans control wild animals, how humane is the culling of kangaroos?"* presumes that culling is humane and that alternative "control" methods are relevant, embedding a lethal-management frame before any opinion is elicited.

Even more problematic is the question: *"For which of the following reasons would you agree with the culling of kangaroos? To prevent starvation of kangaroos during drought; to conserve ecosystems; to preserve grass for agriculture..."*

This list falsely implies that kangaroos regularly starve without human intervention and that lethal control prevents suffering - claims inconsistent with ecological evidence. By offering starvation prevention as an option, the survey actively misinforms respondents at the point of measurement.

The survey further misleads participants by embedding government justifications within the questions themselves, such as: *"For thirteen years, kangaroos have been culled in ACT nature reserves for the conservation of grassland and woodland animals. How supportive are you...?"*

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This phrasing states a contested claim (“for conservation”) as an established fact. Respondents are not asked whether the premise is true, only how supportive they are of it. This turns the survey into a confirmation instrument, not a measure of community attitudes.

Finally, the survey’s key question -

“Which statement best describes your opinion on culling?”

offers only:

- culling is appropriate under certain circumstances
- culling is inappropriate under any circumstances
- unsure

This design forces all conditional views, ethical objections, concerns about welfare, transparency, evidence, motives, or alternatives into a single broad “against in any circumstances” category. The structure inflates apparent support while minimising space for informed dissent.

Taken together, these flaws demonstrate that the 2022 Micromex survey cannot be considered a valid or reliable measure of community sentiment. It relies on an unrepresentative sampling method, embeds government narratives into question wording, presents misleading assumptions as factual premises, primes respondents toward pro-culling interpretations, and fails to measure ethical, welfare-related, or non-lethal viewpoints. Using such a survey to claim public confidence or support is methodologically indefensible.

We hope this submission is received in good faith and thank you for taking our feedback into consideration.

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Chairperson

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18/12/2025

References

- ACT Civil and Administrative Tribunal. (2014). *Animal Liberation ACT v Conservator of Flora and Fauna*. ACT Civil and Administrative Tribunal.
- ACT Government. (2025a). *Nature Conservation (Buru—Eastern Grey Kangaroo—Draft Controlled Native Species Management Plan) Public Consultation Notice 2025 (NI2025–604)*. Nature Conservation Act 2014 (ACT), s. 162. <https://www.legislation.act.gov.au/>
- ACT Government (2025b). *Canberra Earless Dragon*. Retrieved from: <https://www.act.gov.au/environment/animals-and-plants/act-threatened-species/canberra-grassland-earless-dragon-tymanocryptis-lineata>
- Allen, C. (2016). *Earless dragons' bossy breeding behaviour proves a challenge for Canberra researchers*. Retrieved from ABC News: <https://www.abc.net.au/news/2016-04-17/researchers-tackle-endangered-dragons-bossy-breeding-behaviour/7331184>
- Animal Welfare Act 1992 (ACT) (Austl.). <https://www.legislation.act.gov.au/a/1992-45>
- Aston, V. (2017). State surveillance of protest and the rights to privacy and freedom of assembly: a comparison of judicial and protester perspectives. *European Journal of Law and Technology*, 8(1). <https://ejlt.org/index.php/ejlt/article/view/548>
- Australian Bureau of Statistics (2023). *Data Collection Methods*. Retrieved from: <https://www.abs.gov.au/websitedbs/D3310114.nsf/home/Basic+Survey+Design+-+Data+Collection+Methods#:~:text=However%2C%20telephone%20interviews%20are%20very,and%20the%20confidentiality%20of%20results.>
- Bekoff, M. (2024). *The Emotional Lives of Animals: A Leading Scientist Explores Animal Joy, Sorrow, and Empathy – and Why They Matter (Revised)*. New World Library.
- Ben-Ami, D. (2011). *The Ends and Means of the Commercial Kangaroo Industry: An Ecological, Legal and Comparative Analysis*. University of Technology, Sydney.
- Boom, K., Ben-Ami, D., Croft, D. B., Cushing, N., Ramp, D., & Boronyak, L. (2012). *'Pest' and resource: A legal history of Australia's kangaroos*. Retrieved from: https://voiceless.org.au/wp-content/uploads/2018/05/Pest-and-Resource_-_A-Legal-History-of-Australias-Kangaroos.pdf
- Brooks, D. (2025) *Roogate*. Retrieved from: <https://davidbrooks.net.au/essays/1993-2/kangaroo-1/>
- Dawson, T. (2002). *Kangaroos. Biology of the Largest Marsupials*. Cornell University Press.

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Department of Climate Change, Energy, the Environment and Water (2021). *National code of practice for the humane shooting of kangaroos and wallabies for non-commercial purposes*. Retrieved from:

<https://www.dcceew.gov.au/environment/wildlife-trade/publications/national-code-practice-humane-shooting-kangaroos-and-wallabies-non-commercial>

Drew, L. (2017). Capitalism and masculinity: kangaroo killing in Australia. In D.N (Ed), *Animal Oppression and Capitalism*. Praeger.

Environment, Planning and Sustainable Development Directorate (EPSDD) (2020). *Review of the ACT EGK CNSM Plan*. Retrieved from:

https://www.environment.act.gov.au/_data/assets/pdf_file/0020/2555012/24_056063-Documents-Part-09.pdf

Francione, G. L. (2008). *Animals as persons: Essays on the abolition of animal exploitation*. Columbia University Press.

Frawley, K. J. (2009). *ACT Kangaroo Management Plan March 2009 (Public Consultation Draft)*. Canberra, Australian Capital Territory: Australian Capital Territory Government.

Gordon, I., Snape, M., Fletcher, D., Howland, B., Coulson, G., Festa-Bianchet, M., Caley, P., McIntyre, P., Winpenny, C., Baines, G. & Alcock, D. (2021). Herbivore management for biodiversity conservation: a case study of kangaroos in the Australian Capital Territory (ACT). *Ecological Management & Restoration*, 22, 124-137.

Greenberg, S. A. (2009). How citation distortions create unfounded authority: analysis of a citation network. *Bmj*, 339. <https://www.bmj.com/content/339/bmj.b2680>

Haraway, D. (1988). Situated knowledges: The science question in feminism and the privilege of partial perspective. *Feminist Studies*, 14(3), 575–599.

<http://www.jstor.org/stable/3178066>

Harrison, M. (2021) *Yuin Declaration for Kangaroos*. Retrieved from:

<https://www.kangaroosalive.org/yuin-declaration>

Howland, B., Stojanovic, D., Gordon, I. J., Stirenmann, I., Fletcher, D., Snape, M., & Lindenmayer, B. D. (2015). Habitat preferences of the threatened striped legless lizard: implications for the management of grazing in grasslands. *Austral Ecol*.

Kangaroo Conservation Cull Animal Welfare Assessment (2013). Retrieved from:

https://www.act.gov.au/_data/assets/pdf_file/0010/2589049/animal-welfare-and-compliance-assessment-of-the-2013-act-kangaroo-conservation-cull.pdf

Animal Liberation ACT

Submission to the 2025 Public Consultation on the Draft Eastern Grey Kangaroo Controlled Native Species Management Plan

Kangaroo Conservation Cull Animal Welfare Assessment (2015). Retrieved from: https://www.act.gov.au/_data/assets/pdf_file/0011/2589050/animal-welfare-and-procedure-compliance-for-non-commercial-kangaroo-shooting-act-2015.pdf

Kangaroo Conservation Cull Animal Welfare Assessment (2017). Retrieved from: https://www.act.gov.au/_data/assets/pdf_file/0003/2589051/animal-welfare-assessment-kangaroo-culling-2017.pdf

Kangaroo Conservation Cull Animal Welfare Assessment, (2023). Retrieved from: https://www.act.gov.au/_data/assets/pdf_file/0004/2589052/animal-welfare-assessment-of-kangaroo-culling-act-2023.pdf

Legge, S (2024) Independent statutory review of the ACT's Eastern Grey Kangaroo Controlled Native Species Management Plan 2017. Report to the ACT Government.

Lewis, S. (2023). State of Environment Report. Office of the Commissioner for Sustainability and Environment. ACT Canberra. Retrieved from: <https://www.actsoe2023.com.au/OCSE/ACT-State-of-the-Environment-Summary-Report-2023.pdf>

Liberty (2025). Retrieved from: <https://www.libertyhumanrights.org.uk/issues/>

McLaren, C. D., & Bruner, M. W. (2022). Citation network analysis. *International Review of Sport and Exercise Psychology*, 15(1), 179–198. <https://doi.org/10.1080/1750984X.2021.1989705>

Mjadwesch, R. (2011) *Nomination to List the Large Macropods as Threatened Species under the NSW Threatened Species Conservation Act 1995* MESS Bathurst

Montford, K. S., & Taylor, C. (2020). Colonialism and animality. *Colonialism and Animality: Anticolonial Perspectives in Critical Animal Studies*. Routledge.

NSW Government. (2011). Code of Practice for Injured, Sick and Orphaned Protected Fauna. Environment and Heritage. Retrieved from: <https://www.environment.nsw.gov.au/publications/code-practice-injured-sick-and-orphaned-protected-fauna>

NSW Parliament. (2021). *Inquiry into the health and wellbeing of kangaroos and other macropods in New South Wales: Report*. Legislative Council, Portfolio Committee No. 4 – Industry.

Office of the United Nations High Commissioner for Human Rights (2024). *Human Rights & Infertility. Research Paper*. Retrieved from:

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<https://www.ohchr.org/sites/default/files/documents/issues/women/Research-Paper-HRs-Infertility.pdf>

Oxford Learners Dictionary (2025)

<https://www.oxfordlearnersdictionaries.com/us/definition/english/welfare?q=welfare>

Regan, T. (2004). *Empty cages: Facing the challenge of animal rights*. Rowman & Littlefield.

Taylor, M. (2021) *Injustice: Hidden in plain sight the war on Australian nature kangaroo, koala, emu...hunted, sold, homeless...where lies truce, healing?* Independent Ink.

UTS Centre for Compassionate Conservation (2025).

<https://www.uts.edu.au/about/faculties/transdisciplinary-school/td-research/centre-for-compassionate-conservation/our-purpose#our-approach>

Varvaro, K. (2025) *Kangaroos in the Australian Capital Territory: An institutional ethnography of human conflicts over wildlife management*. [Doctoral dissertation, University of Wollongong].

Vivian LM & Godfree RC (2014) *Relationships between vegetation condition and kangaroo density in lowland grassy ecosystems of the northern Australian Capital Territory: analysis of data 2009, 2010 and 2013*. CSIRO, Australia.