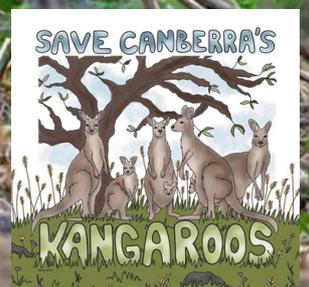
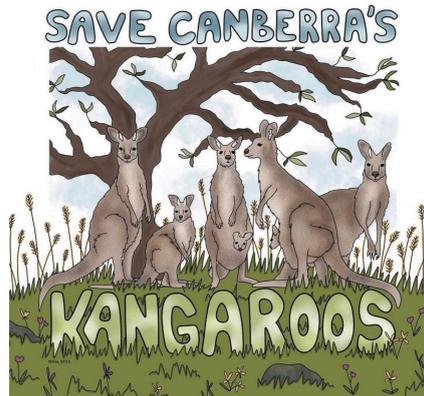


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**Submission to the Nature Conservation
(Buru—Eastern Grey Kangaroo—Draft
Controlled Native Species Management
Plan) 2025**





Save Canberra's Kangaroos welcomes the opportunity to provide comments on the ACT Government's Nature Conservation (Buru—Eastern Grey Kangaroo—Draft Controlled Native Species Management Plan) 2025 (Draft Plan) and hope that the ACT Government receives this feedback in good faith.

Who are we?

Save Canberra's Kangaroos is a group of compassionate Canberrans who are advocating to defend the lives of Canberra's kangaroos. SCK started in 2021 when a small group of animal activists decided that there needed to be a dedicated group with a mission solely focussed on kangaroos. Our group now comprises people from all ages, from school aged children to those that are retired who all have a common goal of saving our kangaroos.

Core purpose and goals:

- 1. End the ACT Government's annual kangaroo cull and the issuing of licenses to harm kangaroos**
- 2. Advocate for the implementation of kangaroo-vehicle collision mitigation measures like virtual fencing and wildlife over/underpasses**
- 3. Allow wildlife carers in the ACT to rescue and rehabilitate Eastern Grey Kangaroos and their joeys**

It is through the lens of our core purpose and goals that we have reviewed the Draft Plan and made a number of recommendations.

It is important to acknowledge that SCK is never going to support the killing of kangaroos for "conservation", development or other economic benefit. SCK's views on the killing of kangaroos for these reasons are well known by both the ACT Government and the community and SCK, and its members, have written many papers, letters and posts detailing our reasons for opposing this killing. However, we acknowledge that this consultation is not on whether or not the ACT Government should kill kangaroos. So in light of this, we have made a number of recommendations on how this plan can be improved in lieu of the killing coming to an end. We sincerely hope that the recommendations are respectfully considered and may be incorporated into the final version of the Buru—Eastern Grey Kangaroo—Controlled Native Species Management Plan 2025.

List of recommendations

1. Non-lethal habitat protection measures must be used for “grazing sensitive species” in place of killing.
2. Remnant populations of critically endangered species must be translocated to a suitable habitat or sanctuary, where they can be protected from further fragmentation and habitat degradation.
3. All references to the impacts of Buru on threatened species must be removed unless there is actual compelling evidence cited, and all claims of impact should appropriately articulate the broader conservation context, including the other threats at play.
4. A compassionate conservation approach must be adopted, which values individual lives and their intrinsic worth and rights.
5. The ACT Government must commission research from institutions that have compassionate, non-lethal approaches to environmental protection, in order to ensure the “best available science” actually presents a balanced and unbiased picture of effective approaches.
6. Institutions and individuals with dissenting views to the ACT Government’s current approach must be empowered and respected to produce and present evidence in favour of compassionate and non-lethal environmental protection approaches.
7. All future “independent” reviews of the management plan must be conducted by individuals and/or institutions which do not have a background that is biased towards lethal management approaches.
8. Carcasses must not be used for the purposes of being turned into baits to be used to kill Waragul.
9. The baiting, trapping and killing of Waragul in the ACT must come to an end and instead co-existence methods are deployed to assist graziers & rural landholders in areas near to Waragul territory, such as the use of guardian animals and funding for appropriate shelter for animals.
10. When conducting population estimate counts of Buru, the ‘direct counting’ method should be used as the preferred method, as it is the most accurate method of counting kangaroos.
11. The ACT Government should commit to investigating and implementing counting by drones or infra-red technology, in conjunction with direct counts, and publish the footage when publishing their population estimates.
12. Mount Taylor Nature Reserve must not be included in future conservation culls.
13. Weed control must be undertaken as a priority on Mount Taylor Nature Reserve.
14. Research must immediately be funded into the short- and long-term psychological welfare implications of fertility control on Buru.
15. Big ear tags must be replaced with smaller tags for fertility-control treated Buru.
16. “Conservation” culls must not be conducted at sites where fertility control is being used, so that the welfare impacts that fertility control has on a population are not compounded by the welfare impacts of culling.

17. An ACT Government veterinarian must be made an integral part of the culling operation, including being present on all nights of the culling operation.
18. When publishing the annual culling data, there must be data published regarding: the number of killed pouch young who were furred vs unfurred; the number of elongated teats in killed female Buru; the number of sub-adults killed. The government veterinarian can assist with collecting this data.
19. The ACT Government veterinarian must check each Buru body before burial to ensure no live pouch young are present.
20. When publishing annual culling data, there must be data published regarding: the number of Buru who escaped wounded and were unable to be located and killed; the number of pouch young who escaped their mothers pouch before they were able to be killed; the methods used to kill pouch young. This information can be recorded by the shooters as they conduct their operations.
21. Future audits must include random, systematic post-mortem checks (without prior notice to shooters) to assess accuracy and ensure pouch young are not being missed.
22. Shooter training and testing must include demonstrating proficiency in the killing of pouch young.
23. Conservation Management Advice Reports must be released before culling operations begin, not after, so the public can see population estimates and understand the likely impact before targets are announced.
24. All shooters must be required to wear mandatory body cameras, similar to law enforcement officers, to ensure compliance with codes of practice and provide verifiable evidence of welfare standards.
25. When developing the ACT Standard Operating Procedures, clear guidelines must be included about when culling operations should be called off as a result of extreme weather conditions such as high wind.
26. Shooters must never herd Buru for the purpose of shooting.
27. In the Draft Plan section titled “Buru Welfare”, explicitly acknowledge all of the welfare impacts to Buru that are associated with the killing programs.
28. Research must be funded that engages rural landholders and independent scientific experts to work together to assist rural landholders to find sustainable solutions for coexistence and improved landscape resilience.
29. Proof of damage or other economic impact must be required prior to authorisation of shooting being granted, and annual updates from rural landholders must be required on whether killing Buru has improved the situation.
30. The ACT Government must urgently develop specific, measurable, outcome-based objectives for the rural cull, rather than its current approach of simply setting quotas for the number of Buru that can be killed.
31. In place of rural culling, a compensation or incentive scheme must be developed whereby rural landholders are given financial compensation in return for the number of Buru they allow to graze on their land.
32. In place of rural culling, funding must be provided to rural landholders to replace all of their fencing with wildlife-friendly fencing (including wildlife gates, a white top wire, and no bared wire). In the meantime, compensation must be provided to rural landholders for any proven instances of damage to their fencing resulting from Buru getting caught on it.

33. The ACT Government must work directly with rural landholders to provide regular education on coexistence with Buru and on implementing non-lethal coexistence strategies.
34. Evidence must be required that landholders have genuinely attempted non-lethal approaches to land management before licences to kill are granted.
35. The evaluation of the rural cull must be assessed against the specific, measurable, outcome-based objectives for the rural cull that are developed as per our previous recommendation.
36. Independent veterinary audits of the rural cull must be conducted at intervals equivalent to those applied to the “conservation” cull, and the audit reports published online in the same manner as for the “conservation” cull.
37. Rural culling data must be published annually on the ACT Government website, in a manner that is equally as accessible and prominent as the "conservation" cull data.
38. Rural landholders must be required to report the number of males and females they kill, including during the “male-only” culling season, and this data must be published annually on the ACT Government website.
39. Rural landholders must be required to report the number of joeys they kill, including a breakdown of whether they are furred or unfurred and what method of killing is used, and this data must be published annually on the ACT Government website.
40. The ACT Government must continue to prohibit the commercial killing of Buru in the ACT.
41. Co-existing must be prioritised when urban development is proposed. All developments should explicitly assess the presence of Buru in the area and ensure that the development will not have adverse impacts on their lives and welfare. Where such impacts cannot be avoided, the development should not proceed.
42. Any planned killing of Buru in connection to urban development must be announced publicly before it occurs. The number of killed Buru must also be publicly available afterwards, including pouch young.
43. Habitat connectivity must not just be *considered*, it must be *required* in all new development.
44. ACT Wildlife carers must be permitted to rescue, rehabilitate and release Buru and their joeys. Release sites can be outside of the city in areas such as Namadgi National Park, or agreements can be made with carers in NSW to release the Buru in already designated release sites.
45. The precautionary note paragraph on page 85 of the Draft Plan must be removed.
46. In lieu of the ACT Government reversing the ban on wildlife carers in the ACT being able to rescue and rehabilitate Buru, a live tally of the number of joeys that have been transferred into care in NSW must be available on the ACT Government ‘Living with Kangaroos’ webpage.
47. The Urban Wildlife Officer team must be expanded to ensure that an absolute minimum of two rangers are on-call, one for northside and one for southside, outside of business hours. Consideration must be given to having Urban Wildlife Officers on duty during the peak crash time of 5.00pm to 10.00pm.

48. Euthanaisa allowance must be expanded to licensed wildlife carers, as is done in other states and territories, to ensure that injured Buru are tended to in a timely manner and their suffering is not prolonged.
49. A method of tracking must be developed for the time between the call and the time it takes for a ranger to attend an injured Buru so that the performance indicator can be accurately measured
50. It must be ensured that, at the very least, one Urban Wildlife Officer is on duty on Christmas Day.
51. Awareness campaigns must be conducted for the community on who they need to call for injured Buru. This could include road signs, letterboxed information and providing stickers for people's cars that they can have on hand with the relevant information.
52. Darting licenses must be expanded to ACT Wildlife carers and/or all Urban Wildlife Officers.
53. The reason for and action undertaken by the attending Urban Wildlife Officer (that has already been recorded in internal systems) must be published at regular intervals on the 'Living with Kangaroos' webpage.
54. ACT Wildlife and Save Canberra's Kangaroos should be invited to collaborate on the driver awareness campaigns.
55. The Directorate should collaborate with Access Canberra on incorporating wildlife awareness courses in learner driver training.
56. Wildlife collision mitigation measures must be explored and implemented as a matter of urgency on all hotspot roads in Canberra.
57. Inclusion of collision mitigation methods must not just be *considered* during the design of new and upgraded major roads in the ACT, it must be *required*. There must also be a long-term plan put in place to retrofit collision mitigation methods to existing road infrastructure.
58. The following groups must be invited to the stakeholder workshop on collision mitigation measures: ACT Wildlife, Save Canberra's Kangaroos, Animal Liberation, the Animal Protectors Alliance.
59. The ACT Government must consider the establishment of a centralised, publicly accessible wildlife roadstrike data collection system database, in conjunction with and for adoption by all. This system should integrate data from wildlife rescuer groups, insurance claims, council reports, police data and individual wildlife rescuer call-outs, ensuring data method consistency and transparency, and 'single point of truth' data curation.
60. The draft signage policy must be released publicly as soon as possible.
61. The use of night-vision equipment must be included in shooter tests for shooter who will be shooting Buru using this equipment.
62. The installation of new barbed wire in the ACT must be prohibited and all barbed wire removed from in and around reserves.
63. The practice of grazing of cattle and sheep in ACT nature reserves must end immediately, given the degradation that these animals cause to the soil and grass of these reserves.

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Killing & Contraception for ‘Conservation’

Introduction

As per the *Buru (Eastern Grey Kangaroo): Draft Controlled Native Species Management Plan* (referred to from here as ‘Draft Plan’), we will use the Ngunnawal term ‘Buru’ when referring to eastern grey kangaroos within the ACT and ‘kangaroo’ when referring to the species more broadly. Please see the section [“The use of Ngunnawal language”](#) for our commentary on this.

Page 5 of the Draft Plan outlines the purpose of the plan:

The purpose of the controlled native species management plan is to set out the approach to be adopted in maintaining wild populations of Buru in the ACT while managing their negative environmental, economic and social impacts, and ensuring their welfare. Particular consideration is given to managing Buru grazing pressure on native grassy ecosystems in the context of total grazing pressure from all herbivores and additional factors influencing ground layer vegetation.

SCK strongly rejects the claim that Buru cause negative environmental impacts. No independent, credible scientific evidence has ever substantiated this assertion. Additionally, even if Buru were shown to contribute to some ecological pressures, there is no evidence that killing them is either necessary or effective in reducing those impacts. Humans (and specifically the ACT Government) are responsible for creating and continuing to create the conditions that threaten our local ecosystems. The scale of destruction caused by humans far exceeds anything attributable to Buru. On this basis, lethal “management” of Buru can never be justified.

Buru & the environment

The Draft Plan correctly acknowledges the following:

Since European colonisation, the ACT environment has changed significantly. Land was cleared for agriculture and urbanisation, invasive plant and animal species were introduced, native species were extirpated and Ngunnawal traditional practices such as burning and hunting were largely removed from the landscape. This degradation of Country has caused significant distress to Ngunnawal people.

In particular, the native grasslands and grassy woodland communities of the lowland areas of the ACT have undergone a significant contraction of their former range. Two ecological communities, Natural Temperate Grassland and Yellow Box – Red Gum Grassy Woodland, are now listed as critically endangered and many species contained with them are threatened. Continued urbanisation has resulted in smaller, more fragmented and more degraded habitat causing multiple challenges for ecosystem conservation that requires careful and integrated management (ACT Government 2017a, 2019).

And:

Populations of Buru remain an integral and important component of the ACT's native grassy ecosystems both culturally and ecologically. Buru are a conspicuous large herbivore and an especially important species to the Ngunnawal people and the broader community living in the 'bush capital' ... Ecologically, Buru play an important ecological role as grazing engineers that influence grassy habitat structure and cycles nutrients for use by other species.

However, the Draft Plan goes on to make many unsubstantiated claims about the impacts of Buru to the environment. We will unpack why each of these claims are unfounded.

Overpopulation

The Draft Plan states:

Urban grassy areas of the ACT represent a refuge from natural threats to Buru whilst introducing novel barriers to their natural movement through the landscape. Under these conditions, natural population regulation processes, such as predation and dispersal, are disrupted and population densities can increase exponentially. Buru densities can reach levels where they impact the welfare of the environment, themselves or humans (both socially and economically).

This claim is flawed on multiple levels.

Firstly, the presence of “novel barriers” to Buru movement in ACT’s urban grassy areas is a human-caused issue. It is unjustified to demand that Buru pay with their lives for problems created by reckless urban human development. Responsibility lies with humans (and the ACT Government) to address these impacts, including by ensuring there are sufficient wildlife corridors and safe road-crossing options that allow Buru to move freely through the landscape.

Secondly, the assertion that Buru no longer face natural threats, and the claim that their populations “can increase exponentially”, are unsupported. There is no credible evidence defining what constitutes “high densities”, nor at what point kangaroo numbers become ecologically problematic. Buru have evolved to self-regulate their reproduction in response to resource availability. When food is scarce, females do not conceive, embryonic development pauses, and males stop producing sperm. In other words, fertility rates fall naturally, ensuring populations adjust to reduced feed rather than increasing its (already quite high) mortality rate ([Dawson 2012](#)).

Buru also reproduce slowly - typically one joey per year, weaned at 18 months old. Males breed from five years of age, and females from two years ([Dawson 2012](#)).

Mortality is naturally high, let alone with the addition of human pressures. Even in good conditions, most adult kangaroos eventually starve to death due to tooth wear ([Dawson 2012](#)). Infant mortality ranges from 50-70 per cent, and in some years reaches 100 per cent ([Mjadwesch 2011](#)), largely due to predation by foxes and eagles ([Banks et al 2000](#)). Foxes

have inherited the niche left by dingoes, and habitat clearing has made young kangaroos more vulnerable to eagle predation. On top of these natural pressures, Buru now face additional threats that were unknown before European colonisation: guns, motor vehicles, pollution, exotic diseases, habitat loss, and accelerated climate change.

With low fertility and high mortality, overpopulation in free-ranging kangaroos is biologically impossible. Their maximum annual population growth is about 10-11 per cent ([Mjadwesch 2011](#)). Several studies show that when spared human interference (eg management slaughters), kangaroo populations stabilise naturally, with infant survival rates balancing adult mortality ([Arnold et al 1991](#); [Coulson et al 1999](#)).

Overgrazing

The Draft Plan states:

When Buru density is greater than can be supported by grass productivity, grazing pressure can lead to a change in species diversity (Driscoll 2017), a reduction in grass structure, ground cover and biomass (Neave and Tanton 1989; Howland et al. 2014; Vivian and Godfree 2014; McIntyre et al. 2015; Stapleton et al. 2017; Braden et al. 2021), that can lead to reduced regeneration, increased weed invasion, altered soil processes and increased erosion (ACT Parks Conservation and Lands 2010; McIntyre et al. 2010).

There is a lot to unpack here.

At its core, the argument that Buru grazing causes ecological damage rests on selective and often misapplied studies. Many of the cited works carry conflicts of interest: Driscoll (2017) was funded by an ACT Government Environment Grant; Brett Howland (Howland et al. 2014) is an ACT Government ecologist who went through Fenner School (explained in the section titled "[Manufacturing 'Best Available Knowledge'](#)"); McIntyre et al (2010, 2015) are closely tied to the Fenner School; Stapleton et al. (2017) was funded by the ANU and the National Parks Association of the ACT, both with strong government associations. We discuss this pattern further in the section titled "[Manufacturing 'Best Available Knowledge'](#)".

Beyond these conflicts, the claims suffer from two fundamental flaws. Firstly, none of the cited studies provides evidence that killing Buru is necessary or effective. Secondly, there is no clear definition of what "Buru density greater than can be supported by grass productivity" actually means. This vagueness underpins the government's repeated, unsubstantiated claims that Buru "overgraze".

In fact, in 2014, the ACT Government engaged CSIRO Plant Studies to produce a study (Vivian & Godfree [2014](#)). This study "could not identify any upper limit of kangaroo density beyond which vegetation richness, diversity and overall condition declines." The Government did its best to suppress this report, as the conclusion clearly contradicted the fundamental premise that it has always based its Buru killing program on. This report was only released after an FOI request for it was lodged.

In reality, Buru rarely overgraze. Unless they are forced to it by confinement or extreme drought, they leave sufficient vegetation to maintain soil cover. Only when groundcover has

already turned to dust and other grasscover-dependent species have already been wiped out (eg reptiles and insects) will they graze stubble and roots. Because they require green feed, their grazing actually prevents their preferred plants from overtaking shorter species, helping sustain ecological balance.

Buru's physical traits actually *protect* ecosystems. Their soft, broad feet and hopping locomotion prevent them from trampling plants and damaging soil cover. Their mobility allows them to graze widely (so long as adequate wildlife corridors are maintained), further preventing localised overgrazing. They disperse seeds and spores via their fur and faeces, and the gentle impressions their toe claws make in the soil provide perfect mini-habitats where falling seeds can take root. These behaviours maximise and maintain diverse plant heights and ground cover ([Mjadwesch 2011](#)), which in turn supports a wide range of species.

The ecological role of kangaroos is to eat grass and move in ways that maximise habitat opportunities for other plants and animals. The arrangement of their teeth - incisors for biting and molars for chewing - means they don't gnaw down to bare soil like sheep or rip plants out by the roots like cattle. Instead, they maintain vegetation at heights that enable strong root systems to survive and hold soil in place ([Dawson 2012](#)).

By lightly disturbing the grassy layer, Buru grazing limits competitively dominant grass species, opening space between tussocks that provide niches for other species ([Price et al 2019](#); [Prober et al 2013](#)). Far from being destructive, Buru play a vital role in maintaining ecological diversity and resilience.

Kangaroos have lived in Australia for five to fifteen million years ([Cardillo et al 2003](#)), evolving behaviours and biology that are perfectly adapted to their environment. Every aspect of kangaroo biology helps maintain biodiversity and soil stability.

Threatened Species

The ACT Government has consistently justified killing Buru by claiming it is to protect the habitat for threatened species. The Draft Plan repeats this, stating in Table 5 that one "welfare impact" of Buru is:

Excessive grazing pressure resulting in loss and degradation of habitat critical to other species including threatened species of grassy ecosystems.

When this claim was challenged during a 2013 ACAT hearing, a government spokesperson admitted it was simply "PR" (ACAT Hearing on ACT Government Kangaroo Cull 2013, day 1 page 7). Yet, the same list of threatened species continues to be cited by the government, including in this Draft Plan.

The reality is, Australia's climate is naturally highly variable. At times, some species thrive and survive, while others decline. Sometimes there aren't enough animals to manage vegetation, or enough vegetation to feed animals. These fluctuations are normal. Rather than indicating overgrazing - as the Buru Management Plan suggests - they reflect a dynamic system where species adapt to changing conditions. As proven over millions of years, this variability benefits all species in the long run.

We will use the Canberra Grassland Earless Dragon (Dragon) as an example. The Dragon has long been cited as a victim of Buru grazing. References to the Dragon in the government's kangaroo management plans has been declining - it was mentioned 27 times in the 2010 plan, 18 times in the 2017 plan, and just 3 times in this current Draft Plan. Clearly, the government is realising the weakness of the evidence that Buru grazing harms the Dragon. Much to the contrary, Buru grazing promotes the patchy, varied vegetation that Dragons prefers - they prefer "areas with a more open structure, characterised by small patches of bare ground between the grasses and herbs" ([NSW Office of Environment and Heritage accessed 2025](#)).

Despite 16 years of killing Buru, Dragon populations have collapsed. They are now undetectable at six of nine ACT monitoring sites ([DCCEEW 2023](#)). From 2018-2021, despite the killing of Buru, a 91% decline in population was recorded, with limited recovery expected ([DCCEEW 2023](#)), and their status has been escalated from endangered to critically endangered.

The real drivers of Dragon population decline are well-documented:

- **Habitat fragmentation:** Less than 1% of native temperate grasslands (the habitat of the Dragon) remains in Australia ([Melville et al 2018](#)). Urban and agricultural development has severely fragmented Dragon habitat in the ACT ([ACT Flora and Fauna Committee 1996](#)) and continues to do so, with several known sites currently under threat despite federal advice to avoid development in these areas ([DCCEEW 2023](#)).
- **Drought:** Extreme droughts in southern Australia have impacted Dragon survival ([Melville et al 2018](#)).
- **Ineffective weed management:** Poor management has allowed weeds to overtake Dragon habitat. For example, at Amtech East offset, Dragon habitat shrank from 18 ha to under 4 ha over a decade ([DCCEEW 2023](#)).
- **Insufficient grazing:** When Buru numbers are too low, biomass builds up, reducing inter-tussock spaces which the Dragon benefits from, as well as increasing wildfire risk ([DCCEEW 2023](#)).
- **Climate stress:** Rising temperatures have reduced Dragon daily activity time and increased their risk of extinction ([Doucette et al. 2023](#)).
- **Other:** Reduced prey availability, reduced burrow density predation, increasing diurnal temperatures, inbreeding ([DCCEEW 2023](#)).

Yet, the Draft Plan misleadingly cites the [Draft DCCEEW Dragon Recovery Plan](#) to claim:

Overgrazing by Buru during drought conditions have contributed to a decline in dragons across the ACT (DCCEEW 2023).

This statement, presented without context, exaggerates the role of Buru grazing. The DCCEEW Draft Recovery Plan identifies grazing as one of many factors, with sheep and cattle grazing being the primary concern. By isolating Buru, the Draft Plan distorts the evidence.

Legge ([2024](#))’s summary of the same source is a far more accurate:

The cumulative effects of many threats has led to this situation, but kangaroo grazing (both too much during drought, and too little in wetter years) has possibly contributed, with other factors, to the species’ decline.

Legge rightly stresses “possibly”, as well as correctly acknowledging that a combination of factors are at play. Later in her review, she highlights the absence of monitoring of the impact of the ACT Government’s Buru killing on “grazing sensitive species”. Her recommendation to partner with groups to produce carefully designed surveys and analysis has been ignored - the Draft Plan doesn’t plan to report on “grazing sensitive species” until 2028, with no commitment to proper monitoring. Osbourne ([2018](#)) notes that “without monitoring the responses of species to processes such as grazing, drought and fire, the impact of human management actions can be very difficult to interpret”.

Even if Buru grazing during drought *did* pose a risk to the Dragons, killing Buru is not the solution. Alternatives exist: temporary exclusion fencing (used successfully in 2009 by the ACT Government - the source for this is unpublished data by ACT Parks, Conservation and Lands which is discussed in the [KMP 2017](#)), artificial burrows ([Osbourne 2018](#)), and translocation programs, which have worked for other endangered lizards ([Souter et al. 2004](#)) and are recommended by Legge ([2024](#)).

The problem for the Dragons is not Buru. It is human-driven habitat loss and climate stress. Targeted relocation or habitat restoration is far more effective and ethical than killing thousands of healthy Buru every year, especially when the supposed threat is speculative and the real solutions are already known.

Recommendations:

- 1. Non-lethal habitat protection measures must be used for “grazing sensitive species” in place of killing.**
- 2. Remnant populations of critically endangered species must be translocated to a suitable habitat or sanctuary, where they can be protected from further fragmentation and habitat degradation.**
- 3. All references to the impacts of Buru on threatened species must be removed unless there is actual compelling evidence cited, and all claims of impact should appropriately articulate the broader conservation context, including the other threats at play.**

Degradation of the Canberra Nature Park

If the ACT Government is serious about repairing and protecting the Canberra Nature Park (CNP), it must seriously confront the human-made drivers of ecological decline rather than scapegoating Buru. The primary causes are clear:

- **Urban expansion and fragmentation:** The building of Canberra itself, and the ongoing encroachment of development into rural areas, has destroyed and

fragmented native habitat. Roads and high-speed traffic now bisects reserves, and development pushes right up to the fences of the reserves.

- **Grazing legacy and mismanagement:** The ecological legacy of a century of sheep and cattle grazing (trampling, rootstock grazing and ripping, damming of creeks to provide water to cattle & sheep etc) has caused irreversible damage to the CNP. Today, cattle are still allowed to graze in some reserves in a misguided attempt to manage the biomass overgrowth that was caused by the removal of too many kangaroos.
- **Biomass overgrowth:** With kangaroo populations now too low to manage vegetation, weeds and tall grasses have proliferated.
- **Climate change:** Anthropogenic climate change has caused long term changes in general weather conditions, changing the tolerability of the climate for the plants and animals that live here, and also more frequent, sustained and severe extreme weather events.

The Draft Plan acknowledges that the decline of ACT lowland grassy ecosystems is not primarily due to Buru grazing, but rather to a combination of the human-driven factors we mentioned outlined above. However, it goes on to say:

The factors leading to the ecological imbalance remain in place and continue to be impossible and impractical to reverse.

This insistence that these factors are “impossible and impractical to reverse” is a deliberate shifting of responsibility - absolving the government of modifying any of their practices while placing the burden for fixing the situation onto Buru.

The Draft Plan’s logic is clear - because the landscape is fragmented and degraded, Buru must be “managed”. But, Buru did not cause this situation. Humans did. Even if Buru contribute marginally to habitat stress, the overwhelming drivers are human-made and ongoing. Killing simply deflects accountability.

Instead, the ACT Government must directly address the true causes of degradation by:

- Halting further development that destroys ever more wildlife habitat;
- Restoring land currently used for livestock grazing as protected wildlife habitat; and
- Establish proper wildlife corridors that allow safe movement across the CNP.

Since the primary drivers of degradation are human-made, solutions must confront human behaviours. The damage is ours, not that of non-human animals, and our conservation strategies must reflect this truth. We therefore urge the ACT Government to adopt a compassionate conservation framework: one that moves beyond a species-centric approach to one that values individual lives and their intrinsic worth. Compassion must be brought into conservation decision-making.

Recommendations:

- 1. A compassionate conservation approach must be adopted, which values individual lives and their intrinsic worth and rights.**

Manufacturing ‘Best Available Knowledge’

The Draft Plan claims to be “based on the best available knowledge of Buru biology and ecology”. In reality, the ACT Government has a long history of hiring advisers and consultants whose work aligns with its preferred approach to kangaroo management, while silencing dissenting voices. Many of the documents cited in the Draft Plan are authored by a small, recurring group of individuals, creating the illusion of broad scientific consensus, and by extension ‘best available knowledge’, when in fact it is entirely manufactured.

Manufactured consensus

This pattern began in 2007, when plans to kill kangaroos at Defence-owned sites faced public outrage and international attention. To justify its actions, the ACT Government commissioned a series of reports, published between 2007-2008, which the then ACT Commissioner for Sustainability and the Environment concluded supported the killing. In 2008, 470 kangaroos were killed at the Belconnen Naval Transmission Station, followed by 7,000 at the Majura Training Area in 2009. Although the reports appeared to represent a wide range of experts, most authors contributed to multiple documents, giving the impression that the government had “the backing of pretty much the entire scientific establishment in Australia” ([Kvinta 2015](#)).

This practice continues today.

We analysed 10 of the most cited authors in the Draft Plan. Nearly half (46%) of the non-government references in the Draft Plan included at least one of these ten individuals as co-authors. That is a very small pool of people to rely on so heavily for such a significant portion of the claims made in the Draft Plan, which are then used to justify the annual killing of Buru.

Several of these authors were employed by the ACT Government during their authorship of the work that is cited in the Draft Plan - which produces a clear conflict of interest.

Many others are closely tied to the ANU Fenner School for Environment and Society. The ACT Government works with Fenner School as “Project Partners” (see list of Project Partners [here](#)), which presents opportunity for bias in these projects towards the ACT Government’s lethal management agenda.

The influence of this small group extends beyond just the ACT. Their work has been cited in commercial kangaroo management plans across South Australia, Victoria, NSW and Western Australia, helping to justify large-scale killing of kangaroos nationally.

And finally, several of these authors are directly involved in the Mulligans Flat and Goorooyaroo Woodland Experiment, which depends on kangaroo killing. In 2013, the ACAT approved kangaroo killings at these reserves specifically to support the experiment. Annual culls continue to sustain this research, giving these authors clear incentive to support this continued lethal “management”.

Silencing Dissent

The ACT Government has not only relied on the same small circle of authors to justify the kangaroo killing, it has actively suppressed the voices of experts who challenge that narrative.

The three ACAT hearings (2009, 2013, 2014) that examined the legitimacy of the culls are perfect case studies to demonstrate how dissenting experts were dismissed, while government-aligned witnesses received little scrutiny. We thank Varvaro (2025) for her work on analysing the ACAT hearings and identifying these instances.

Firstly, in the first two hearings, the conflict of interest of the ACT Government witnesses was ignored. An ACT Government ecologist served simultaneously as the ACT Government's sole witness *and* adviser to the ACT Government's barrister (Varvaro 2025). In 2014, additional witnesses ACT Government expert witnesses were accepted without question, despite one having done prior contracts with the ACT Government and the other having had a role in earlier site assessments that led to the kangaroos being killed in 2008 (Varvaro 2025).

By contrast, dissenting experts were discredited. In 2009, consulting ecologist Dror Ben-Ami was deemed "partial" simply for having completed a project commissioned by Animal Liberation NSW. In 2013, consulting ecologist Raymond Mjadwesch was deemed "partial" for having produced an independent report for an ACT Minister regarding kangaroo populations in the ACT, labelled an "unsolicited piece of advocacy" by the ACAT panel (Varvaro 2025).

This clearly shows the double standard by the ACAT panel regarding the assessment of the impartiality of the dissenting experts and of the ACT Government experts.

Furthermore, there was a lot of bias shown towards the ACT Government witness (who was also the adviser to the ACT Government's barrister) (Varvaro 2025). The ACAT panels repeatedly elevated his evidence above the expert witnesses (Varvaro 2025). The panel cited his local career as a justification, while giving no such high regard to equally qualified ACT-based expert Mark Drummond, or conservation biologist and internationally recognised kangaroo researcher Daniel Ramp (whose work the ACT Government then went on to cite extensively in its 2010 KMP). Consulting ecologist Raymond Mjadwesch was given harsh scrutiny regarding his 200+ professional reports, simply because they were not published in peer-reviewed journals. Yet, the ACT Government expert witness had himself no publications at that point in peer-reviewed journals, but did not receive any scrutiny for it (Varvaro 2025).

And finally, there was a huge discrepancy in the amount of time that was provided to dissenting experts and ACT Government experts to give evidence. In the 2009 hearing, for example, the ACT Government expert witness presented for 7 hours and 58 minutes, while the dissenting experts (Drummond, Ramp and Ben-Ami) appeared for only a combined 2 hours and 27 minutes.

Other examples of suppression of dissenting voices over the years include:

- In 2009, Dr Robin Tennant-Wood was commissioned to write a paper on kangaroos. Her findings, however, did not support the government's narrative that kangaroos need killing, and she was subsequently harassed, defamed and forced to return what she had been paid, despite doing exactly as she had been contracted to do.
- Expert submissions opposing the killing of kangaroos were ignored in both the 2010 and 2017 KMPs.
- The government has only funded one analysis of its own data, to show whether or not kangaroo grazing is harming the ecosystems of ACT reserves. That analysis, conducted by CSIRO Plant Industries in 2014, once again failed to support the government's narrative, finding no evidence of harm to ACT reserves by kangaroos. The Government suppressed the study. It was only released publicly when requested via FOI.

The result of all of this has been a research environment where dissent is punished, independent voices are silenced, and only studies that reinforce the ACT Government's position are promoted. This deliberate bias ensures far more publications exist to support the kangaroo-killing narrative than there are to challenge it.

Tight research timeframes

Varvaro (2025) points out how the ACT Government awarded many contracts to external consultants to conduct research, audits, reviews and surveys between the 2007-2017 period that she studied in her thesis. These contracts often occurred with limited budgets and had to be completed within tight timeframes, with aspects of projects being compromised as a result.

For example, McIntyre et al ([2010](#)), which is used as a reference in the Draft Plan, had only a short six week duration to make its observations. It noted that one of the limitation to the study due to this was: "our floristic description of the vegetation was necessarily restricted". This is important, as ecologist Ray Mjadwesch noted at the ACT hearings that floristic complexity is more important than biomass when trying to make connections between Buru grazing and the impacts on biodiversity.

Recommendations:

- 1. The ACT Government must commission research from institutions that have compassionate, non-lethal approaches to environmental protection, in order to ensure the "best available science" actually presents a balanced and unbiased picture of effective approaches.**
- 2. Institutions and individuals with dissenting views to the ACT Government's current approach must be empowered and respected to produce and present evidence in favour of compassionate and non-lethal environmental protection approaches.**
- 3. All future "independent" reviews of the management plan must be conducted by individuals and/or institutions which do not have a background that is biased towards lethal management approaches.**

Carcass utilisation

The Draft Plan has a whole outcome dedicated to carcass utilisation:

Outcome 6 – Buru carcasses resulting from culling activities are utilised to reduce waste and benefit the environment and community	
Interim Outcome N – Buru carcasses resulting from the ACT Government conservation cull are utilised where possible.	
Activity	Performance indicator
N.1 Some Buru carcasses resulting from the conservation cull will be used to produce baits for exotic predator management programs.	Proportion of Buru carcasses used to make baits each year.
N.2 Carcasses, or parts thereof, resulting from the conservation cull are provided to the Ngunnawal community as requested.	Requests from Ngunnawal community for carcasses are fulfilled each year. Proportion of Buru carcasses provided to Ngunnawal community each year.
N.3 Carcasses, or parts thereof, resulting from the conservation cull are used for research purposes to further the understanding of Buru biology, genetics and health.	Requests from researchers for access to carcasses are fulfilled when feasible. Proportion of Buru carcasses used for research each year.

Dingoes (Waragul)

The Draft Plan states that the ACT’s policy position is:

The Waragul population that is present in Namadgi National Park and Tidbinbilla Nature Reserve will be maintained as a natural component of the Buru-pasture system while impacts on neighbouring farmers and stock are mitigated.

Yet the ACT Government webpage’s webpage, ‘[Waragul \(Dingoes\) / wild dogs](#)’ (which, as of November 2025, still refers to Waragul as “pest animals”), indicates that the ACT Government “controls” Waragul in conservation areas near rural properties due to alleged “extreme impacts” on graziers. It further claims that Waragul attacks lead to stress, anxiety and loss of income for graziers and uses this as a justification for control of Waragul.

Current control methods used by the ACT Government include:

- leghold traps
- poisoned baits (1080 sodium fluoroacetate baiting)
- shooting
- exclusion fencing
- guardian animals.

The ACT Government states that it monitors control methods to ensure that they are “delivered efficiently, cost effective and carried out humanely”. However, any compassionate person can see that the first three control options are far from humane, especially leghold traps and 1080 baits.

[Recently it was revealed](#) that the ACT Government was illegally using leghold traps on Waragul in Namadgi National Park, breaching its animal welfare laws. Rather than ending

the practice, it instead amended the legislation so that it could continue its cruel use of leghold traps. In [Questions on Notice](#), the ACT Government admitted that off-target animals are occasionally trapped in these legholds, with wallabies being the most commonly affected species.

1080 bait, which is banned in most other countries, is particularly cruel and indiscriminate. [More than just the target species](#) ingest the baits, leading to other animals being cruelly killed by these baits. Death is [prolonged and agonising](#), sometimes lasting days. Concerningly, [companion animals can also ingest the bait](#), with [many reports](#) from families who have reported the trauma of watching their dogs die after ingesting baits. The RSPCA has long held that [1080 is “not humane”](#) and has called for the development of alternatives. [Research has suggested](#) that routine baiting of Waragul yields little benefit to graziers, while leaving Waragul alive allows populations to stabilise, actually [reducing predation pressure](#).

[There are kinder, more effective ways](#) to protect grazier’s animals that don’t result in the cruel and unjustified killing of Australia’s native apex predator.

It is also perplexing that the bodies of the killed Buru are then being used to kill Waragul. The Draft Plan says the following:

Buru populations in upland native grassy ecosystems have remained largely unmanaged because these areas are dominated by continuous nature reserves and Buru there live within a less disturbed ecosystem where natural population regulation mechanisms are still functional (e.g. Waragul [dingo] predation).

Yet paradoxically, the bodies of killed Buru are used as bait to kill Waragul in these upland native grassy ecosystems (Namadgi National Park). This risks driving Waragul populations to dangerously low levels. A leading ACT Waragul researcher [has already warned](#) that Waragul could be on a “trajectory towards extinction”. If Waragul disappear, will the ACT Government then claim Buru in Namadgi must be killed too?

This cycle is deeply concerning. By using the bodies of killed Buru to kill Waragul, the ACT Government risks undermining the very “natural regulation” it claims to value, while paving the way for further justifications to kill more Buru.

Recommendations:

- 1. Carcasses must not be used for the purposes of being turned into baits to be used to kill Waragul.**
- 2. The baiting, trapping and killing of Waragul in the ACT must come to an end and instead co-existence methods are deployed to assist graziers & rural landholders in areas near to Waragul territory, such as the use of guardian animals and funding for appropriate shelter for animals.**

Counting methods

The methods used to count kangaroos and generate population estimates, which are then used to inform “management decisions”, have come under scrutiny both [in the ACT](#) and [nationally](#).

In 2021, two passionate Canberrans undertook a massive eight-month [citizen science project](#) to identify their own population estimates of Buru in the nature reserves that make up Canberra Nature Park (excluding the two reserves closed to the public). Using the direct counting method, their findings were completely at odds with the ACT Government’s claims that Buru are “overabundant” in the reserves or are having a deleterious effect on the grassy layer. Only eight nature reserves (or 20% of ACT reserves) recorded Buru densities over 'one Buru per hectare,' and even then only marginally. By this measure, Buru are certainly not 'overabundant'.

Since this project's findings, more direct counts have been undertaken in a number of Canberra’s nature reserves. Most recently, SCK undertook a population estimate of the Buru population on Red Hill Nature Reserve in May 2025. The reserve was divided into five sections, each surveyed by a minimum of two counters. The counts began from 10am on a Sunday morning until the whole reserve was searched with each Buru sighting being recorded. We then repeated this count the following weekend. The results for the first count were 447 Buru. The results for the second count were 443 Buru. This shows that our direct counting method is accurate as the results were repeatable.

Walked Line Transect Distance Sampling method

By contrast, the ACT Government uses the method of walked line transect distance sampling. [In the ACT Government’s own words](#), *this type of survey involves an observer walking along fixed linear transects and recording the distance and compass bearing to groups of kangaroos. Observers walk a total of approximately 44 km of transects per site which takes approximately 11 days.* This method also involves counters accounting for kangaroos they don’t see, but they believe could be there based on the distance along the line they are. Essentially meaning they are counting kangaroos that potentially, and very probably, do not exist. ACT Government officials have previously told SCK in a meeting that the reason for counting kangaroos that they do not see, is because ‘kangaroos are hard to see’ and so you have to account for a number of them that you may not see. SCK has conducted a number of counts on reserves and we know that while kangaroos can blend into their landscape, when you are specifically looking for kangaroos to count them, you are not going to miss them and hence no need to inflate your counts by including kangaroos that you have not actually seen. Additionally, given that the ACT Government’s walked line transect counts are conducted over 11 days, there is a very real risk of counting the same kangaroos more than once when returning on a subsequent day. While kangaroos tend to hang out in the same areas, they do move across their home range.

Buru management units

Each reserve where the conservation cull takes place is designated into a “Buru Management Unit”, which can sometimes include land which is outside the reserve boundary. Over the years the BMUs have varied in what reserves/land make up a certain

Buru, and how big a BMU is. SCK holds significant concerns about this occurrence as this leads to population estimate fluctuations, meaning in some instances the directorate may be way overstating the actual population of Buru.

Case Study - Mt Taylor BMU

A striking example of the ACT Government’s unreliable use of the Walked Line Transect Distance Sampling Method is evident in their population estimates for the un-culled Mount Taylor Buru Management Unit (BMU).

The BMU comprises of Mount Taylor Nature Reserve and an adjoining horse paddock. It is boarded by a “kangaroo-proof” fence along the Tuggeranong Parkway to the west, Sulwood Drive and Kambah to the south, and Athllon Drive to the east. According to the [Kangaroo Management Advice 2025](#):

The particularly high level of kangaroo-vehicle collisions which occur along both Sulwood and Athllon Drives is likely a major mortality source for individuals within this population and also indicates some level of animal movement between adjacent KMUs.

Walked Line Transect Distance Sampling has been conducted at the site since 2019, and despite the BMU boundaries remaining unchanged, the population estimates over this period - shown in the table below - are wildly inconsistent:

	Population Estimate	Change from previous year
2019	1067	
2020	564	47.1% decrease
2021	743	31.7% increase
2022	1047	40.9% increase
2023	635	39.4% decrease
2024	762	20.0% increase
2025	637	16.4% decrease

The population supposedly dropped by 47% from 2019 to 2020, then increased by 31% in 2021 and 41% in 2022. This level of population increase is simply biologically implausible - their maximum annual population growth is about 10-11 per cent ([Mjadwesch 2001](#)). This is especially true in a BMU that by the government’s own admission is bordered by high-mortality roads and contains horse paddocks where rural culling may occur.

The inconsistencies have serious consequences. In 2022, the inflated estimate of 1,047 Buru could have resulted in a cull of 775 Buru, as per the government’s management advice. The following year’s estimate (2023) was just 635 - meaning a cull based on the earlier figure would have theoretically whipped out the entire population. Despite this near 40% drop, the government offered no explanation and instead recommended in its [2023 advice](#):

A large reduction in kangaroo density is also recommended for Mt Taylor KMU this year, a site at which kangaroos have not been previously managed. Kangaroo densities have remained well above sustainable levels at Mt Taylor due to this lack of previous management.

Rather than investigating the reasons for the rapid population decline, the government recommended killing 414 Buru in 2023.

If the estimates are taken at face value, the population has declined 40% since 2019. How, then, can lethal management be justified in the face of a self-regulating (at best) or declining (at worst) population?

Clearly, either the population estimates are wrong, the BMU boundaries are flawed, or both. Whatever the cause, the data is too erratic and unreliable to form the basis of life-or-death decisions such as the killing of Buru. And this is just one example among many of erratic government population estimates over the years at ACT reserves. The ACT Government's refusal to acknowledge or explain these inconsistencies undermines the credibility of its entire management framework.

Recommendations:

- 1. When conducting population estimate counts of Buru, the 'direct counting' method should be used as the preferred method, as it is the most accurate method of counting kangaroos.**
- 2. The ACT Government should commit to investigating and implementing counting by drones or infra-red technology, in conjunction with direct counts, and publish the footage when publishing their population estimates.**

Mount Taylor Nature Reserve

Mount Taylor Nature Reserve has never had its Buru killed as part of the ACT Government's annual "conservation cull", despite repeated Conservation Management Advice Reports recommending that the Buru living on this reserve be killed. SCK is grateful that these Buru have so far been spared, but we are increasingly concerned that their inclusion in the killing program is imminent. As such we have decided to include a small section in our submission about this reserve to recommend that it continue to be excluded from having its Buru killed as part of the conservation cull.

The Buru population on this reserve is healthy, but not overabundant. They already face numerous mortality factors which include road strike and predation from the, also quite healthy, fox population on this reserve. Mount Taylor is surrounded by roads which are considered Buru collision hotspots such as Sulwood Drive, Athlon Drive and the Tuggeranong Parkway. Many Mount Taylor Buru are sadly hit by vehicles on these roads on a regular occurrence. Additionally, there are a number of foxes that reside on this reserve and they have been spotted with joeys in their mouths, indicating they are preying on the Buru population. It is well-known that foxes predate Buru young ([Banks et al 2000](#)).

Another characteristic of this reserve is its significant invasive weed problem. At the time of writing, there are swathes of St John's Wart flowering across the reserve, as well as Paterson's Curse. It is particularly bad on the fire trail summit track towards the top. Weeds can be as destructive as land clearing – displacing and threatening native species and transforming ecosystems. It is concerning that more thought seems to be put into recommending that Buru on this reserve be killed to protect the environment when the weed problem on this reserve is not under control. Below is a photo from 22 November on Mount Taylor Nature Reserve, where the weeds are almost as tall as the Buru. The fate of the Small Purple Pea and Pink-tailed Worm-lizard on Mount Taylor will be much worse, so long as this weed problem is left unchecked. It would not make sense to start targeting the native Buru on this reserve, while the invasive weeds take over much of the reserve.



Additionally, there are a number of wallabies who live alongside Buru on Mount Taylor. Should this reserve be included in the next conservation cull, SCK has significant concerns about the fate of the wallabies who may also be killed during the shooting.

Recommendations:

- 1. Mount Taylor Nature Reserve must not be included in future conservation culls.**
- 2. Weed control must be undertaken as a priority on Mount Taylor Nature Reserve.**

Fertility Control

The Draft Plan states:

GonaCon Immunocontraceptive Vaccine will continue to be implemented at suitable sites as part of the ACT Government's Buru Management Program in lowland native grassy ecosystems to assess if this method is a cost-effective approach to decrease population growth and reduce the amount of culling required.

Yet, Buru in Mulligans Flat have been treated with GonaCon since 2022, but in 2025 experienced the biggest cull since 2019, with 176 Buru shot and 62 of their joeys killed. This calls into question the effectiveness of GonaCon at reducing the ACT Government's perceived need for culling.

Welfare

In the section of the Draft Plan titled "4.1.Buru Welfare", when discussing fertility control, it says the following:

While the use of fertility control has benefits for reducing the number of Buru killed, the welfare impacts on the treated individual's health and behaviour require consideration, along with the social welfare impacts of this management method. Based on current information, minimal long term impacts of fertility control on the health and behaviour of macropods have been recorded, although further research is required in this area (Wimpenny et al. 2021).

The only meaningful comment Wimpenny et al ([2021](#)) makes about welfare impacts is that females are "freed from the costs of reproduction", resulting in outcomes such as increased survival and greater gain of body mass. Far from freedom, fertility control strips females of their bodily autonomy and prevents them from fulfilling their natural reproductive instincts. The psychological welfare impacts of this would be immeasurable. Wimpenny et al ([2021](#)) attempt to soften this reality by noting that "current methods are generally applied to females that have already experienced at least one breeding cycle", but this does little to address the ethical concerns. If a human woman was made involuntarily infertile after having her first baby, that would not make it any more ethical or justifiable than making her involuntarily infertile before she had any babies at all.

Even more concerning, Wimpenny et al ([2021](#)) states "behavioural effects from GonaCon have not been investigated in detail in female macropods". Given that females are the most likely to suffer psychological and physiological impacts from the fertility treatment, the fact that this has not been researched in more detail is very alarming.

Thus, when the Draft Plan claims that "minimal long term impacts of fertility control on health and behaviour have been recorded", the key words are "*have been recorded*". Impacts cannot be recorded if they have not been properly investigated to begin with. The lack of research into the behavioural effects of GonaCon undermines any claim that fertility control is benign, and raises serious welfare and ethical questions about its use.

Additionally, Buru have very sensitive ears, and they have been observed displaying discomfort due to the big tags that are used on their ears to indicate that they have been treated with fertility control.

The following images demonstrate the placement of the tags on the ears of ACT Buru, which any empathetic person can see would be very uncomfortable for an animal whose ears are so sensitive.

Image 1: An up-close image of a fertility control ear tag, on a Buru who was found killed on the side of the road in Hughes in mid-2025. This image makes it clear how invasively-located the tags are.



Image 2: An image of a Buru at Red Hill in 2025 who has had fertility control tags attached to both ears.



Image 3: An image of a Buru at Red Hill in 2025 who has a fertility control tag and also has a joey in her pouch.



Percentage to be made infertile

In the Draft Plan, the ACT Government cites itself to justify a shockingly high fertility-control target:

Current recommendations based on population modelling suggest that approximately 70% of all females should be made infertile in order to limit population growth (ACT Government 2025a).

The source it is citing is the ACT Kangaroo Management Advice 2025, which has the following statement regarding the 70%:

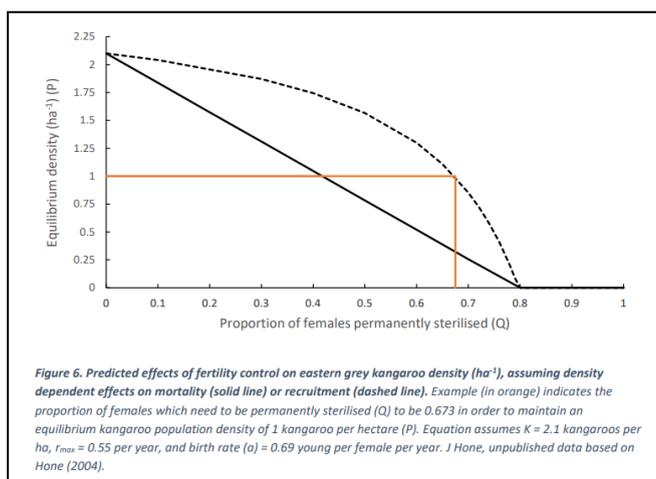
Initial recommendations are to treat approximately 70% of the adult females at each of the selected sites, with site specific target numbers being determined based on the model by Hone (2004).

So, in reality the source for the 70% is Hone (2004). It is unclear why the Draft Plan doesn't just cite Hone (2004) instead of creating a difficult pathway to the original source of the information. Perhaps it is because Hone (2004) is not specifically about Buru or even kangaroos at all, and makes some problematic assumptions.

Thankfully, Sarah Legge (2024) does a far better job explaining how the 70% came to be:

The initial target for fertility control, in populations where this is being used, is to treat around 70% of all females. This target is based on a model by Hone (see Figure 6 in ACT Government 2023b) which considers a population at growth equilibrium (2.1 kangaroos/ha); a maximum theoretical growth rate of $r = 0.55$; and a fecundity rate of 0.7 young per female per year. This seems a sensible starting point, and can be refined, if needed, in the future.

Figure 6 in the ACT Kangaroo Management Advice 2023, which Legge points towards, is:



There are many things wrong with this. For starters, a population growth rate of 55% is biologically implausible - their maximum annual population growth is about 10-11 per cent (Mjadwesch 2011). The use of a single fecundity value (0.7 young per female per year) ignores that Buru can suppress their reproduction during times of resource limitations

([Dawson 2012](#)). Treating 2.1 Buru per hectare as an “equilibrium” generalises across the wide variety of habitat conditions across ACT grasslands. Ultimately, pursuing a blanket 70% fertility treatment target based off of these extreme assumptions could result in populations depressing below viable thresholds.

Treated Buru killed during “conservation” cull

We will speak further on the welfare concerns of the “conservation” cull in the following section. One major issue, however, is the killing of Buru who had already undergone fertility control.

The shooter’s operational reports for 2025, obtained via FOI, revealed that two ear-tagged kangaroos were killed during this year’s “conservation” cull. Presumably, this was not intentional as it would not make sense to be killing kangaroos who have been treated with Gonacon, because this would be a waste of ACT Government funding and it also doesn’t align with the purpose of the Gonacon program.

This is indefensible. These Buru were subjected to invasive fertility control, only to be slaughtered anyway.

Recommendations:

- 1. Research must immediately be funded into the short- and long-term psychological welfare implications of fertility control on Buru.**
- 2. Big ear tags must be replaced with smaller tags for fertility-control treated Buru.**
- 3. “Conservation” culls must not be conducted at sites where fertility control is being used, so that the welfare impacts that fertility control has on a population are not compounded by the welfare impacts of culling.**

Welfare concerns

There are numerous welfare concerns in relation to the ACT Government “conservation” culling. We outline them below.

Wounding

Bafflingly, the Draft Plan makes no mention of wounding.

When Buru are shot but not “rendered immediately insensible”, the ACT Government calls it “wounding”. Buru who suffer “wounding” are left with painful injuries until killed by a second shot, blunt force trauma to the head, or - most disturbingly - they are never found at all, and are left to endure prolonged pain. Reports from so-called “independent” veterinary audits of the ACT culls confirm that wounding is a recurring outcome.

The documented **wounding rates** in these reports have been as follows: 2.1% in [2015](#), 3.4% in [2017](#), and 3.5% in [2023](#).

These figures assume that all Buru who were shot but not located died instantly, but this is an unverifiable assumption. Also, importantly, these statistics were the results that were collected under audit conditions, when the shooters were under observation. This means they represent “best-case” scenarios. The shooters would surely have been focussing extra hard to make sure they performed well in front of the auditors. As such, the standard wounding rates, when an observer is not present, cannot be known.

Averaged across the three audits, **the wounding rate is 3.0%**. If this rate was applied to the [2025 cull](#), during which 2,978 Buru were killed (excluding any who may have been injured but escaped), this equates to up to **89 Buru suffering prolonged pain before death**.

Some **examples of wounding** throughout the audits include:

- A Buru shot in the shoulder; killed only after a second shot to chest. ([2015](#))
- A Buru shot in the eye socket; killed only after a second shot to chest. ([2015](#))
- A sub-adult Buru shot in the chest; who took 5 seconds to die. ([2015](#))
- Six Buru left alive but “recumbent and immobile” after first shot; required additional use of blunt force trauma to the head to be killed. ([2017](#))
- A Buru shot in the jaw; killed only after a second shot to the cranium. ([2017](#))
- Two Buru shot in the jaw; killed only after a second shot to the chest. ([2017](#))
- Three Buru shot in the jaw or neck; suffering 28, 45 and 49 seconds before death. ([2023](#))

In [2017](#), the median **time of suffering** (time to death) for the nine Buru wounded Buru was one minute. One individual suffered for five minutes. This means that at least five Buru endured between one and five minutes of pain, potentially from injuries as painful as shot jaws.

Also in [2017](#), four Buru were “**missed and then shot**”. In these cases, the first shot at them missed, but they were killed by a second shot. This raises welfare concerns about the psychological stress they may have felt between the two shots.

Buru have been documented getting shot and **injured but escaping**, with the shooters unable to find them to kill them. This happened to two Buru in both [2017](#) and [2023](#). It is concerning to imagine how long these Buru may have suffered from these injuries. If, like some of the wounded Buru listed above, they had their jaw shot, this could have resulted in prolonged suffering due to the pain as well as not being able to eat or drink and so ultimately dying of starvation or dehydration. And again, it is important to note that these incidents occurred under audit conditions, when shooters knew they were being observed. The true frequency of injured Buru escaping outside of audits is unknowable.

Additionally, the audits also documented cases where Buru who were shot and “presumed killed” were **unable to be located**:

- [2015](#): Five Buru were shot and “presumed killed” but “the shooting team could not locate” them. For one of these Buru they blamed “the presence of protestors limiting access to shooting sites” for their inability to locate. For the remaining four, they said it was because of “limited illumination being used during searching” because they “were constrained by the operating environment not allowing the use of white light”.

The 2015 report recommended that “improved strategies for searching for shot animals should be considered to improve future welfare outcomes.”

- [2017](#): One Buru was “shot and killed” but “could not immediately be found by the shooting team. This animal was located approximately two hours after shooting.”

Given that (as per the audits) the shooters are killing between one and seven Buru in one go before going to check on the bodies, it is unsurprising that they are unable to locate some of the Buru they have shot. When Buru are fleeing in all directions to escape the danger, it must be difficult to keep track of who you shot and where they are located. For this reason, there should be limits placed on how many Buru can be shot before they are checked on. This is also important given that the delay caused by shooting multiple Buru at once would result in prolonged suffering for any Buru who did not die instantly.

On top of all of this, there were a number of shots that were observed to miss Buru entirely. Two in [2015](#) (1.4%), 21 in [2017](#) (6.0%), and 2 in [2023](#) (1.3%).

It is concerning how many kangaroos have suffered just within the few nights that auditors were present.

All of these audit reports ([2015](#), [2017](#) and [2023](#)) have deemed the above suffering totally acceptable, with the [2017](#) & [2023](#) reports concluding that “independent assessment of this shooting program indicated that animal welfare outcomes were comparable to other professional shooting programs” - as if that means that the welfare outcomes are somehow acceptable.

Orphaned joeys

The Draft Plan makes a very baffling statement in the footnotes of “Table 9. Number of Buru culled for conservation reasons in lowland nature reserves 2009 – 2025”. It says:

*The Buru counted, authorised or shot are 'independently mobile Buru' comprising young-at-foot, sub-adults and adults. **The myth of a 'ghost population' arises because they are mistakenly considered to all be adults.***

This is deliberate and disingenuous reframing. The term “ghost populations” refers to the invisible number of orphaned joeys created when mothers are killed. These dependent young are not counted officially as victims of each cull, but they very much exist, and they very much suffer. The above statement made in the Draft Plan attempts to erase this welfare issue, by claiming the “myth” arises from people misunderstanding that “independently mobile Buru” includes sub-adults and young-at-foot.

There is no misunderstanding. We *know* young-at-foot and sub-adults are counted in population estimates and are included in the number of “independently mobile Buru” who are shot. The ghost population arises because dependent joeys are *not shot*, and instead are left behind when mothers are killed, unless shooters manage to kill them too. Because they are not shot, they are not counted as fatalities, despite the fact that they will most likely die (or at least suffer greatly) as a result of their orphaning.

The ACT Government has always maintained that its culling season reduces orphaning by avoiding the period when large pouch young and small young-at-foot are most vulnerable. The Draft Plan states in section 4.1.1.2 that:

The ACT is the only Australian jurisdiction that restricts culling of female Buru to a defined season (March–July), timed based on seasonal breeding patterns to minimise the rate shooters will encounter female Buru with young in the age of animal welfare concern i.e. between 8 to 12 months of age (large pouch young and small young at foot). Young within this age bracket have a high milk demand but are sufficiently mobile to escape when the mother is shot. The timing of the shooting season has been shown to reduce the prevalence of 8 -12 month old young in rural and conservation culling programs (Fletcher 2007; Lucas et al. 2021).

They claim that the age for animal welfare concern is only between 8 to 12 months of age. However, this range appears to be a totally arbitrary range that the ACT Government defined itself in order to garner social licence for its killing program. In [Fletcher \(2007\)](#) it states: “The ACT Government defined the age of greatest animal welfare concern in regard to orphaning as 8 to 12 months old.” It appears that sometime around 1997, when the ACT Government decided to kill kangaroos at Tidbinbilla, they defined this as the period of greatest welfare concern.

In reality, however, Buru remain dependent until weaning at around 18 months of age. They spend at least 12 months in the pouch and then around six months as young-at-foot, before being weaned ([Poole 1975](#); [Dawson 1995](#)). It is therefore mathematically impossible for a fixed annual culling season to avoid orphaning. At best, orphaned joeys are just slight older, but still dependent.

The “independent” veterinary audit reports confirm that dependent young are present during culls:

- [2013](#): There was a discrepancy between lactating mammary glands in the mother Buru who were shot and the number of sub-adult Buru who were shot, indicating that young-at-foot may have been left orphaned. The report said “young at foot not being shot with their dams and escaping is the most likely reason for this disparity” and called it “an area of animal welfare compromise.”
- [2015](#): 17 sub-adults (5% of observed killings) were shot during the audit. Additionally, 7% of the mother Buru who were shot and had pouch young were observed to also have a second elongated mammary gland - “for the five adult female kangaroos that had an elongated teat, it is likely they were, or had recently been, suckling a young-at-foot.” This indicates that there may have been young-at-foot left orphaned. Sadly, “one sub-adult animal (young-at-foot) was shot once (thorax shot) but was not rendered immediately insensible (5 second duration to insensibility)”.
- [2017](#): 93 sub-adults (29% of observed killings) were shot during the audit.
- [2023](#): 11 sub-adults (8% of observed killings) were shot during the audit. Also, “one semi-independent furred pouch young escaped before it could be euthanased. This occurred when the pouch young associated with a dead adult female could not be captured and was lost from vision due to vegetation and terrain.” The report concluded that “this rare event highlights the importance of approaching shot adult female kangaroos quietly, and ensuring any pouch young are identified and firmly

restrained before shot adult females are moved.” Given the “independent” auditor was only present for 144 of the total 1041 Buru killed in 2023, it will never be known how common this actually is.

Additionally, the Draft Plan claims that:

The timing of the ACT shooting season means that most young encountered are unfurred.

While it is true that “most” are unfurred, the audit reports show that there is still a high number that are furred: 14% of pouch young were furred in [2015](#), 24% were furred in [2017](#), and 33% in [2023](#). Furred joeys are generally in a phase of being “in and out of the pouch”. This means they are vulnerable to orphaning during the culls.

Research by the RSPCA revealed that shooters found in some instances they don’t see young-at-foot or they flee before they can be euthanased ([RSPCA Australia, 2002](#)). McLeod & Sharp ([2014](#)) noted that young-at-foot “can be difficult to kill because of the safety issues associated with shooting at close range.”

Research conducted by McLeod & Sharp ([2014](#)) indicates that orphaned young-at-foot very much suffer. They found that:

- “Separated young-at-foot were more frequently the recipients of aggressive acts from others after separation.”
- “We cannot be sure of the motivation for separated young-at-foot to approach other adult females, but was likely to be similar to the motivations of non-separated young-at-foot, namely hunger and non-nutritive physical interaction.”
- “Separated young-at-foot greatly increased the frequency of vocalisations, especially in the first two days following separation.”
- “There was equivocal support for an increase in inactivity following separation and a reduction in the frequency of play events.”
- “The data did not support the idea that the proportion of time spent foraging was affected by separation, although there was some evidence that the young-at-foot separated for the longest were showing signs of a nutritional shortfall”
- “The changes we detected provide sufficient evidence to conclude that maternal separation causes a negative welfare impact.”

The issue of orphaned joeys is further demonstration that there is no ethical way for the ACT Government to conduct the cull.

Joeys buried alive

The only “independent” veterinary audit to conduct a thorough post-mortem analysis of Buru who had been shot (beyond the analysis while observing shooting activities) was the [2013](#) audit. The outcomes were highly unfavourable to the ACT Government and its contracted shooters, and we can’t help but wonder if this explains why subsequent audits avoided performing similarly thorough analysis.

In [2013](#), three furless pouch young were found alive in their dead mothers’ pouches, still attached to their mother’s teat. The report noted that “the pouches of these females had

been checked in the field but in all three cases the females had two active mammary glands.” This suggests shooters assumed the presence of an enlarged teat meant that no pouch young were present, and therefore didn’t bother checking the second teat for potential joeys. The audit provides a possible explanation, stating that “as the shooters were operating with thermal imaging and night vision equipment pouch inspection was limited to palpation in all cases observed with no visual inspection of the pouch.”

This presents an alarming welfare issue. If the vet had not been present to double-check the pouches, these joeys would have been buried alive with their mothers’ bodies.

By contrast, all of the subsequent “independent” veterinary audit reports ([2015](#), [2017](#), [2023](#)) claimed that no pouch young were missed during the observed shooting operations. However, given the serious failure exposed in 2013, it is reasonable to assume that shooters would have become more thorough in their operations while under observation from the auditors. Outside of observation, the true frequency that pouch young are missed (and therefore buried alive) will never be known.

Blunt force trauma for killing joeys

The Draft Plan fails to address the serious welfare concerns surrounding the killing of joeys via blunt force trauma.

According to the “National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Non-commercial Purposes” ([2008](#)), pouch young of shot mothers are to be killed by a single forceful blow to the base of the skull. However, in practice, the method is inconsistently applied and poorly documented. Below are some notes from the “independent” veterinary audits.

- [2013](#): The audit noted that “all pouch young were euthanased by a forceful blow to the base of the skull,” but did not specify the method that was used. The auditor also found that, concerningly, the shooters’ inspections of the joeys after the blunt force was applied “was limited to ensuring the pouch young was neither moving nor breathing. While there was no indication that any of these joeys were not dead, assessment for the presence of a heart beat or corneal reflex, as stipulated by the Code, was not carried out.”
- [2015](#): The audit reported that “pouch young euthanased via blunt trauma had their craniums swung into inanimate metallic parts of the shooting vehicle”, and that “a mean of 2.8 total blows (range 1–7) were struck.” However, the report noted that “a recent study of pouch young euthanasia in commercial kangaroo shooting has also concluded that improved blunt trauma methods should be explored (see Sharp et al. 2015).”
- [2017](#): The audit failed to specify the method that was used to inflict blunt force trauma, or the amount of blows that were used, instead just stating that “the protocol used by all staff involved furred and unfurred pouch young being euthanased via blunt trauma”. Interestingly, the audit report stated that “some staff used a solid wooden board underneath the pouch young while delivering blunt trauma while others did not.” It is not clear what this means - it seems to suggest that the blunt force was delivered while the joeys were still in the pouch, with a wooden board

placed under them to provide a solid surface to assist with the blunt force trauma, however it is unclear.

- [2023](#): The audit again simply stated that “pouch young were euthanased via blunt trauma.”

The [2015](#), [2017](#), and [2023](#) reports make no specific mention of whether shooters checked for the presence of heart beat or corneal reflex after killing the joeys, only noting in each report that “the shooting teams were observed to check all euthanased pouch young to confirm death immediately after euthanasia procedures had been performed”.

In 2022, a Directorate representative admitted that wooden mallets were used to inflict the blunt force trauma to kill joeys ([page 993](#)).

The lack of transparency about the methods used to kill joeys is concerning. The ACT Government is clearly fully aware that the killing of joeys is not something that the general public finds acceptable, and is choosing to remain vague in their descriptions of the method to avoid damaging their social licence to kill Buru in the ACT.

The exact methods are important to share, so that the public can be sure that the methods being used to deliver the blunt force trauma are in line with the most recent research into methods for killing pouch young.

Research by McLeod & Sharp ([2014](#)) has highlighted the risks of using blunt force trauma to kill joeys:

- They observed that “when joeys were held by the back legs and hit on the head with an iron bar they struggled and moved their head, making it a more difficult target to hit. These animals sometimes required two or more blows to cause unconsciousness, which is unacceptable as it could result in pain and suffering prior to losing consciousness. With blunt trauma to the head, applying the blow to the correct position with sufficient force to cause immediate insensibility is essential for this method to be humane.”
- They stressed that “it is important to note that the skill and confidence of the operator has a significant influence on welfare. If blunt trauma is not performed correctly there will be varying degrees of consciousness and it is likely that the animal will experience pain and distress prior to death.” They went on to say “Although the type of euthanasia method used will influence the level of suffering experienced by kangaroo young, the importance of applying the methods correctly together with the training and attitude of harvesters should not be overlooked.”
- They pointed out that “the technique of delivering blunt trauma to the head of a joey is not currently standardized” and as a result they “recorded variability in its use and effectiveness.” They recommended that the method used needs to be standardised, and that “standardisation must include prescriptive training in the best way of using blunt trauma to the head.”
- They pointed out an additional welfare concern regarding the killing of joeys: “when killed using the currently used method of blunt trauma to the head, joeys are usually first removed from the pouch. We have observed that they sometimes wriggle, thrash about and vocalise and some animals appear to be distressed.”

In Sharp et al (2024) one of the six joeys they killed using blunt force trauma required two blows to the head “because the first did not make contact with the correct location on the head.”

These findings show that blunt force trauma is not reliable and presents a serious welfare issue.

Poor welfare deemed acceptable

Despite all of the welfare concerns outlined above - wounding, orphaned joeys, buried joeys, and the use of blunt trauma - the “independent” veterinary audits and the Draft Plan all consistently deem these outcomes as “acceptable”. (Other than the 2013 audit, which deemed the shooters to be “partially compliant”, given they missed the joeys that were alive in the mothers’ pouches).

- 2017 audit: “The percentage of kangaroos rendered immediately insensible (IDR; 96%) was higher than for most published studies of wildlife shooting”. No recommendations for improvement were made.
- 2023 audit: “In light of the compliance with the [Code of Practice] and relative infrequency of adverse events, it is recommended that currently used shooting protocols should be maintained.”

If the Draft Plan wants to be taken seriously in its claims to care about Buru welfare, it must acknowledge that suffering is inherent and inevitable in the program, and commit to reducing it. Simply pointing out that ACT standards are “higher” than other jurisdictions is meaningless when the bar is so low.

Outcome 1 in the Draft Plan is: “the management of Buru in the ACT meets high animal welfare standards.” Yet, nowhere in the Draft Plan does it review any actual welfare outcomes or explain how it intends to improve them. So how can the ACT Government expect to truly meet this outcome if actual welfare is not even being discussed, let alone analysed?

The Draft Plan asserts that:

The ACT has stringent requirements for authorising non-commercial shooting. To achieve the aim of humane killing of Buru in accordance with the National Code, a single shot to the head is required as the method least likely to cause suffering (Descovich et al. 2015).

However, compliance with a 16-year-old Code does not equate to “humane” practices. Given that all of the above welfare concerns were deemed acceptable under the Code, the standard the Code sets is clearly not very high. As Sarah Legge (2024) recommends, the Code must be updated to reflect current knowledge and standards, and the ACT Government should actively work with other jurisdictions to get this updated.

Transparency

The Draft Plan commits to being more transparent and providing more information to members of the public in order to “maintain public access to, and confidence in, the management programs”. While SCK does not have confidence in these management

programs, we do support further transparency when it comes to decisions made about the lives of kangaroos.

Outcome 8 of the Draft Plan suggests a number of activities and performance indicators relating to transparent communications, which SCK welcomes however the following measures are essential:

- Each independent audit should be accompanied by a government response outlining how recommendations will be implemented and how practices will change to address the welfare concerns that were raised. Without this clear meaningful action, audits are meaningless.
- Key welfare data must be systematically recorded and published publicly each year, including:
 - Number of Buru who escape wounded and are not able to be located and killed
 - Number of furred vs unfurred joeys who are killed
 - Number of joeys who escape the pouch of a shot mother Buru before they are able to be killed
 - Number of sub-adults who are killed
 - Instances of missed pouch young by shooters
 - Number of elongated teats indicating potential dependent young
 - Number of fertility-treated female Buru who are shot
 - The methods used to kill joeys

Sarah Legge ([2024](#)) recommended:

Consider increasing the involvement of government vet(s), making them integral member(s) of the culling operations, helping to gather additional information on kangaroo demographics and health, and helping to communicate to the public that animal welfare is a primary consideration during the culling.

The Draft Plan does not provide any indication that this recommendation to make government vets “integral team members” will be implemented, instead just suggesting they’ll be continuing their previous approach where there will be “ACT Government veterinarian participation in the annual planning, delivery and review of the ACT Government conservation cull”.

We strongly support Legge’s recommendation to make ACT Government vets an *integral* member embedded into the culling operations, who is with the culling team on every night of operation and is helping “to gather additional information on kangaroo demographics and health”.

This government vet can be responsible for key roles such as:

- Double checking the pouches of killed Buru
- Assessing the bodies to identify the breakdown of furred vs unfurred pouch young who are killed
- Assessing the bodies to identify the number of sub-adults who are killed
- Checking for and recording instances of teat elongation

This government vet can also assist with the added workload involved in reporting on and publishing the key welfare data that we list above.

Recommendations:

1. An ACT Government veterinarian must be made an integral part of the culling operation, including being present on all nights of the culling operation.
2. When publishing the annual culling data, there must be data published regarding: the number of killed pouch young who were furred vs unfurred; the number of elongated teats in killed female Buru; the number of sub-adults killed. The government veterinarian can assist with collecting this data.
3. The ACT Government veterinarian must check each Buru body before burial to ensure no live pouch young are present.
4. When publishing annual culling data, there must be data published regarding: the number of Buru who escaped wounded and were unable to be located and killed; the number of pouch young who escaped their mothers pouch before they were able to be killed; the methods used to kill pouch young. This information can be recorded by the shooters as they conduct their operations.
5. Future audits must include random, systematic post-mortem checks (without prior notice to shooters) to assess accuracy and ensure pouch young are not being missed.
6. Shooter training and testing must include demonstrating proficiency in the killing of pouch young.
7. Conservation Management Advice Reports must be released before culling operations begin, not after, so the public can see population estimates and understand the likely impact before targets are announced.
8. All shooters must be required to wear mandatory body cameras, similar to law enforcement officers, to ensure compliance with codes of practice and provide verifiable evidence of welfare standards.

Captive bolt devices for killing joeys

Sarah Legge ([2024](#)) says:

It therefore seems that a concussive blow to the head/blunt trauma is the most humane way to kill joeys, because it is rapid, effective, and consistent. However, it is very unpalatable to some of the public. The 2020 commercial Code notes that using captive bolts may provide an alternative option for humanely killing pouch young in the future, but that the effectiveness and consistency of this technique is yet to be demonstrated.

Note this sentence in particular: ***it is very unpalatable to some of the public.***

She goes on to say:

Given the public sensitivity to the killing of pouch young, the ACT Government could encourage and support research to explore whether captive bolts, or some other approach, could potentially replace a concussive blow to the head.

Clearly, the consideration of captive bolt devices as an alternative to blunt force trauma is all about public perception, not welfare.

The Draft Plan echoes Legge's recommendation:

Recent research has shown that a penetrating captive bolt device is an effective alternative method for humanely killing partially furred to fully furred Buru pouch young (Sharp et al. 2024). This new method will be reviewed and assessed for suitability for use during Buru culling programs in the ACT.

The Sharp et al (2024) study was commissioned by the NSW Department of Primary Industries for the purpose of the commercial kangaroo killing industry. It explicitly acknowledges that captive bolt devices are likely to be perceived as a more "clinical" approach than blunt force trauma. In other words, the exploration of this method is about maintaining social licence by making the killing *appear* more palatable.

Sharp et al (2024) explains captive bolt devices as follows:

An alternative to blunt trauma is the captive-bolt device (CBD), which fires a steel bolt that either penetrates (penetrating captive bolt) or hits (non-penetrating captive bolt) the skull, transferring the kinetic energy of the bolt to the head and brain. The aim is to cause concussion and extensive damage to the brain that results in rapid unconsciousness (or insensibility). Stunning with a captive bolt gun is typically followed up immediately with a secondary killing method, while the animal is still unconscious, to ensure prompt death without recovery.

The method that it describes as a secondary killing method is to "exsanguinate" the pouch young. This means to drain them of their blood.

Some results from trials of captive bolt devices are as follows:

- McLeod & Sharp (2014): Trialled the Dick-KTBG spring-powered bolt device and determined that "an unacceptable proportion of animals were not successfully stunned with a single shot when this device was used" on live joeys. 35% of joeys showed incomplete signs of concussion after the first shot, 22% recovered sensibility after the first shot, and some required multiple shots to be killed. One joey was shot three times and still gained consciousness again after a minute.
- Hampton (2018): Trialled the Cash Special gunpowder-powered penetrating captive bolt device. This delivered far greater kinetic energy than the spring-powered bolt device and reported 27 out of 28 pouch young were made immediately insensible.
- Sharp et al (2024): Trialled the Blitz Kerner gunpowder-powered penetrating captive bolt device. They reported that 20 out of 20 joeys were immediately insensible. However, this study was extremely limited - it was tested on only 20 joeys, and the joeys were killed under very controlled conditions at a central site by a single operator. It was also designed for the commercial industry, so its bias must be questioned.

If this method is to be seriously considered, it is important that, as per Legge's recommendation, the ACT Government "encourage and support research to explore whether

captive bolts or some other approach, could potentially replace a concussive blow to the head.” Further research, and careful selection of an appropriate device, is necessary.

Importantly, Sharp et al ([2024](#)) concludes by saying that all shooters “must be trained and be thoroughly familiar with the recommended CBD before using it on live animals. Operators who have less experience and are less skilled in using CBDs are likely to apply more repeat shots, which can cause significant animal pain and suffering.” Therefore, on top of supporting research, the ACT Government would need to ensure that all shooters (both for the “conservation” and rural culls) are thoroughly trained in its use before it is used in the field.

Other

These are some additional aspects of welfare that should be considered in the Plan.

- **Shooting in adverse weather conditions**

During the 2025 ACT Government cull, observing Buru advocates reported shooting in extremely high wind conditions. Such weather increases the risk of inaccurate shots and therefore prolonged suffering Buru. In email communications with the Animal Protectors Alliance, the ACT Conservator of Flora and Fauna wrote, “undertaking the ‘conservation cull’ during all weathers and conditions is normal”. It is baffling that the ACT Government makes no effort to ensure the weather conditions they operate Buru killing under are appropriate for ensuring the welfare of Buru. Particularly given that it seems to directly contravene the National Code, which states: “Where the conditions are such as to raise doubts about achieving a sudden and humane death, shooting must not be attempted.” Clear ACT operating procedures must be established to prevent shooting in unsafe weather.

- **The herding of kangaroos**

Observing Buru advocates also witnessed shooters intentionally herding Buru who were lying down by the reserve boundary, forcing them deeper into the reserve to be shot. This practice compounds the stress for the Buru and undermines claims of caring about Buru welfare.

- **Sustained trauma over multiple nights of shooting**

The shooter notes from the 2025 cull, obtained via FOI, reveal that reserves were targeted on consecutive nights. The psychological impact that repeated nightly shooting must have on Buru must be acknowledged.

- **Immediate trauma**

Austin & Ramp ([2019](#)) found that kangaroos at shooting sites exhibit heightened vigilance, with mothers keeping their joey in their pouch more often. These immediate behavioural changes reflect stress and fear, and must be acknowledged.

- **Lifelong trauma**

Year after year, Buru in ACT reserves endure the loss of family members and social structures due to the ACT Government culls. The long-term welfare impacts of this repeated disruption must be acknowledged.

- **Danger to fleeing Buru**

Fleeing Buru face serious physical risks, including collisions with vehicles or entanglement in barbed wire fencing (which there is a lot of in ACT reserves). These

hazards add another layer of suffering beyond just the shooting itself, and should be acknowledged and mitigated.

- **Shooting Buru where they have no way to escape**

Mulligans Flat and Goorooyarroo nature reserves are surrounded by fences and the Buru who are targeted there have no way out. The situation becomes even worse for those Buru who are trapped within the Buru Exclusion Fencing *within* these fenced reserves, which the [Kangaroo Management Advice 2025](#) explicitly recommends to do: “Culling activities should primarily be undertaken within the two kangaroo enclosures to achieve a lower density in these areas for the Mulligans Flat – Goorooyarroo Woodland Experiment.”

Recommendations:

1. **When developing the ACT Standard Operating Procedures, clear guidelines must be included about when culling operations should be called off as a result of extreme weather conditions such as high wind.**
2. **Shooters must never herd Buru for the purpose of shooting.**
3. **In the Draft Plan section titled “Buru Welfare”, explicitly acknowledge all of the welfare impacts to Buru that are associated with the killing programs.**

Prioritising coexistence

It is telling that the Draft Plan leans on the International Consensus Principles for Ethical Wildlife Control ([Dubois et al 2017](#)), because this signals that they accept those principles as expert guidance. Yet, the ACT Government has much to learn from them.

The principle of “Modifying Human Practices” states ([Dubois et al 2017](#)):

*Human–wildlife conflicts arise from human activities ... and should be prevented and mitigated by altering human practices wherever possible and **by developing a culture of coexistence.***

Conveniently, both Sarah Legge’s review ([2024](#)) and the Draft Plan leave out this key component when summarising this principle. The word “coexist” does not appear at all in either Legge’s review or the Draft Plan. To exclude any discussion of coexistence from a discussion about the native sentient beings we share this land with undermines any claim that the ACT Government values Buru welfare.

Coexistence, not killing, must be the goal when it comes to Buru in the ACT.

The international welfare principles ([Dubois et al 2017](#)) say that:

As the human population grows, it occupies space to the exclusion of wild animals and thus causes changes in the distribution and abundance of other species and of food and habitat. Thus, many species have declined (Ripple et al. 2015) and others have expanded, for example, after being introduced into new ecosystems or after limits to recruitment are relaxed (Long 2003). Therefore, a first response to human–wildlife conflict should be to

focus on how human behavior has affected the ecosystem and to address the root causes of conflict rather than only the problematic outcome.

This applies perfectly to Buru in the ACT. The ACT Government claims Buru populations have expanded, yet instead of examining and addressing human impacts, they focus solely on the alleged "problematic outcome" of "overgrazing" Buru.

They go on to say ([Dubois et al 2017](#)):

*A long-term education-based process, based on **preventive action and increased tolerance**, is also necessary to move toward a culture of greater coexistence with wildlife (Ramp & Bekoff 2015).*

This is perfect advice for the ACT Government. In terms of preventative action, the government must ensure all new developments maintain wildlife corridors and provide safe road crossing options for Buru, and must add wildlife corridors and crossings to existing infrastructure. In terms of increased tolerance, the government must embrace and promote non-lethal approaches to achieving its "conservation" goals.

The Draft Plan admits itself that:

Management of Buru populations is one of several management interventions that can be used to maintain the grassy layer in the desired state.

The Draft Plan lists other management interventions such as habitat modification ("such as temporary fencing or placing logs and rocks"), "weed control and restoration activities", ecological burns, and seed reintroduction.

Outcome H.1 in the Draft Plan is:

Consider alternative/complementary management actions for achieving grass heights in the safe operating environment for:

- a) areas where grass height is below the safe operating environment but are not suitable for conservation culling or fertility control, or*
- b) areas where grass height is above the safe operating environment and the current level of Buru grazing is unlikely to reduce this in the short term.*

Firstly, regarding the second point about grass height being above the "safe operating environment", perhaps if so many Buru were not being killed, the level of Buru grazing would remain suitable to manage the grass height.

But more importantly, this passage in the Draft Plan recognises that alternative actions are suitable in areas where culling or fertility control are not possible. So, if those actions are suitable in those areas, why are they not suitable *everywhere*? Instead of considering that question, the Draft Plan frames these alternatives as only "complementary" to killing.

If Buru welfare is to seriously be considered by the Draft Plan, then the goal of the plan would be working towards reducing, and ultimately eliminating, the alleged need for culling. Instead, it treats non-lethal options as secondary, reinforcing killing as the default.

The ACT Government must fund and support research into compassionate and non-lethal conservation approaches to protect the habitat in the ACT.

Ethical & Welfare Frameworks

Amendments to the Animal Welfare Act 1992

The [Explanatory Statement](#) to the Animal Welfare Legislation Amendment Bill 2019 (the Bill) states that (emphasis added):

*Animal welfare in a modern context describes how an animal is coping both mentally and physically and recognises that animals are sentient beings that have the capacity to feel and perceive things. Achieving good animal welfare relies on recognising the five freedoms of animals ... and encompass at a high level the freedom from hunger and thirst, freedom from discomfort, freedom from pain, injury or disease, freedom to express natural behaviour, and **freedom from fear and distress**. It also relies on recognising that animals deserve having a life worth living, in terms of both physical and **mental wellbeing**.*

In the Draft Plan, it states:

Buru management is undertaken in accordance with the provisions of the Animal Welfare Act 1992. Amendments to the Animal Welfare Act 1992 that were enacted in 2019, include a new set of objectives to ensure animals are recognised as sentient beings that have intrinsic value, deserve an acceptable quality of life and to be treated with compassion. The changes emphasise that people have a duty of care for the physical and mental wellbeing of animals. This plan addresses the welfare of Buru across all areas of influence. Buru welfare during management activities is of the highest priority. Planning and management implementation seek to minimise any physical and mental pain or distress. Additionally, Buru welfare issues associated with negative interactions with people and vehicle collision are considered.

However, there is nothing new in the Draft Plan that actually acknowledges the sentience of Buru in any way. Freedom from fear and distress for Buru are mentioned nowhere in the Draft Plan other than the above paragraph. Likewise, the mental wellbeing of Buru as a result of culling is addressed nowhere in the Draft Plan. It is abundantly clear that the only consideration that the Draft Plan gives to Buru welfare is their “welfare” at the time they are shot - and even then, as we addressed in sections above, that is woefully underaddressed.

The word “distress” is mentioned numerous more times, but only in relation to human distress:

- “significant distress to Ngunnawal people” caused by the degradation of land;
- “distress for the local community” caused by Buru’s “poor body condition, low pouch young survival and starvation during drought conditions”;
- “distress to members of the community who do not support Buru management interventions”;
- “sections of the community” experiencing “emotional distress from the fertility control program due to animal rights or kin associations (Legge 2024)”;
- “human distress” caused by “a number of situations ... including the degradation of grassy ecosystems, culling of Buru, suffering of Buru impacted by vehicle collision, and livestock welfare during dry periods when grazing competition between stock and Buru is high”;

- “negative outcomes for people, including their concern or distress about the Burus’ welfare” which they suggest can be mitigated by providing “support and education to residents about managing encounters with aggressive or injured Buru”;
- The “distress of causing harm for the driver and occupants and the injury to the Buru” when involved in a vehicle strike;
- “distress for community members concerned with the degradation of the grassy ecosystem condition and the impact on threatened species” if Buru are *not* “managed”;
- “rural land holders may experience distress from the impacts of high Buru density on their land”;
- the “social impacts of mass starvation during droughts, Buru-vehicle collision or other negative impacts, with distress associated with viewing an injured Buru or people suffering an injury themselves”;
- “people may experience distress with Buru deaths that occur during the culling programs, concerned with the justification, method and/or the outcome of the programs (Legge 2024).”

It seems they acknowledge the distress of every possible human stakeholder, yet fail to even just once acknowledge the extreme distress of the individuals who are actually facing the slaughter of themselves, their family, and their friends.

Instead, they include a whole table of the negative outcomes supposedly *caused* by Buru:

Table 5. Summary of welfare impacts from Buru

Welfare impact	Summary of impacts
Environment	Excessive grazing pressure on native grassy ecosystems resulting in degradation of the natural integrity of those ecosystems. Excessive grazing pressure resulting in loss and degradation of habitat critical to other species including threatened species of grassy ecosystems.
Buru	Health and survivorship of Buru population Negative human interaction and vehicle collision
Human	Effects on the economic viability of rural businesses and increased management costs for other lands. Cost of vehicle collisions and collision avoidance measures and toll of human injuries. Road accident trauma. Concern in the community over Buru management and actions taken to reduce Buru densities in some areas.

For the Draft Plan to be in line with the amended Animal Welfare Act 1992, it must actively discuss and address the welfare impacts that come with Buru being sentient beings.

The “International Consensus Principles of Ethical Wildlife Control”

In the Draft Plan, it states:

The international principles of ethical wildlife control (Dubois et al. 2017; Legge et al. 2018; Woinarski 2019) are used to evaluate this Plan against principles that are rational, evidence-based and ethical for wildlife and communities (Section 3.3).

The framing is incredibly disingenuous. The Draft Plan refers to and cites the International Principles of Ethical Wildlife Control (Dubois et al [2017](#)) - a framework grounded in animal welfare and compassion - but then tags on two unrelated studies by authors who are strong advocates of lethal wildlife “management”: Woinarski ([2019](#)) and Legge et al ([2018](#)).

Woinarski ([2019](#)) presents a totally different framework than Dubois et al ([2017](#)), explicitly designed to guide decision-making about when it may be necessary to kill native species “to achieve a conservation objective”. This premise directly contradicts the compassionate foundation of the International Principles (Dubois et al [2017](#)). Legge et al ([2018](#)) simply has no relevance at all to the International Principles - it is about the distribution of predator-free havens for mammals threatened by cats and foxes.

By conflating these works, the ACT Government attempts to sneak in its lethal management agenda alongside an actually credible welfare-based framework. This undermines transparency and misleads the public into believing the Draft Plan is aligned with compassionate conservation when, in reality, it is not.

It is also worth noting that one of the co-authors of Dubois et al ([2017](#)) is Dan Ramp from the Centre for Compassionate Conservation, whose expertise was dismissed during the 2009 ACAT hearing, as we discussed in the section above titled “Manufacturing ‘Best Available Knowledge”.

Additionally, the Draft Plan relies on Sarah Legge’s assessment of the killing program’s adherence to the international principles. This ignores that Legge herself is a long-time proponent of lethal wildlife management, and so is of course going to see no ethical issues with the ACT Government’s program. Despite her bias, even Legge is able to see that the killing program prior to her recommendations was inadequate. She identified that the program “mostly adheres to the principles”. She said that “using the framework is a reminder that threats to the ecological integrity of grassy ecosystems (fragmentation, fire regimes, invasive species) should be managed to the extent possible before kangaroo culling is considered”. This reminder, as expected, did nothing to change the ACT Government’s approach to this Draft Plan.

Legge correctly pointed out, regarding the international principles, that “this framework takes a conservation-centric view, and people who prioritise animal rights may fundamentally object to a conservation-centric framework.” Despite the fact that we are writing as if we agree with the international principles, we actually fundamentally disagree with the premise that wildlife need “control” and that there is any way for this to be ethical. However, this ultimately serves to show just how poor the Draft Plan’s ethical and welfare aspects are that

we are in a position where they don't even adhere to these bare minimum principles, and so even getting to the point where they do would be a huge improvement to the plan.

Below we provide a breakdown of some of the ways in which it fails to adequately adhere to the international principles.

Principle 1: Modifying human practices

This international principle (Dubois et al [2017](#)) states that (emphasis added):

*Human–wildlife conflicts arise from human activities (e.g., creation of new food sources, alteration or occupation of habitat, or introduction of species into new areas) and should be prevented and mitigated by altering human practices wherever possible and **by developing a culture of coexistence.***

The Draft Plan does the exact opposite of developing a culture of coexistence. Instead, as is clear from its failure to even mention the word “coexist” even just once, it strongly maintains the ACT Government’s long-held culture of killing.

In response to this principle, the ACT Government attempts to claim that it is impossible to modify human behaviours:

The factors leading to the ecological imbalance remain in place and continue to be impossible and impractical to reverse.

As we detailed in the section "[Degradation of the Canberra Nature Park](#)", that is far from the reality, and there is much that the ACT Government can and should be doing to alter human impacts on the ACT ecosystems.

Principle 2: Justification for control

This international principle (Dubois et al [2017](#)) states that:

The need for wildlife control should be justified with evidence that substantial harm is being caused to people, property, livelihoods, ecosystems, and/or other animals.

As we detailed in the section above titled "[Killing & Contraception for 'Conservation'](#)", there is no plausible evidence for ‘controlling’, ‘managing’, or slaughtering Buru in the ACT.

Principle 3: Clear and Achievable Outcome-Based Objectives

This international principle (Dubois et al [2017](#)) states that:

The desired outcome of a wildlife control action should be clear, achievable, monitored, and adapted based on lessons learned.

As we demonstrated in the section above titled "[Manufacturing 'Best Available Knowledge'](#)", there is nothing adaptive about the ACT Government’s approach. When faced with evidence that contradicts their killing agenda, they do everything they can to suppress and reject it.

The core goals of the killing program have remained the same over the decade and a half it has been in place, and research has been manufactured to support its continuation.

Principle 4: Animal Welfare

This international principle (Dubois et al [2017](#)) states that:

Control methods should predictably and effectively cause the least animal welfare harms to the least number of animals.

As we outlined in the above section titled "[Welfare concerns](#)", the ACT Government deems concerning welfare outcomes to be acceptable. Additionally, if they were genuinely aiming to cause the least harm to the least number of animals possible, they would not kill Buru at all, or at the very least they would have a goal of doing everything possible to reduce the need for killing to zero.

Principle 5: Social Acceptability

This international principle (Dubois et al [2017](#)) states that:

Decisions to control wildlife should be informed by the range of community values alongside scientific, technical, and practical information.

The Draft Plan says that:

The ACT Government is also committed to understand and incorporate community concerns and opinions through community surveys and feedback.

Despite the ACT Government's claims, the Miromex surveys it commissions do little to meaningfully capture community concerns or values. Instead, they primarily measure how effectively government messaging has shaped public opinion.

For example, a recurring question in the surveys has been: "Which of the following statements best describes your opinion with regards to kangaroo culling?" In 2022, 76% of respondents selected "I believe that the culling of kangaroos is appropriate under certain circumstances". The only alternative answers were "I am against kangaroo culling under any circumstances" and "I am unsure about this subject". This framing fails to identify what circumstances respondents consider acceptable when answering this question, or whether those circumstances align with the ACT Government's actual practices.

The surveys do go on to ask the question: "For which of the following reasons would you agree with culling kangaroos?" The listed options, in the order asked, are:

- "on farms, to preserve grass or crops for agricultural production"
- "for commercial harvesting of meats and skins"
- "in nature reserves to conserve plants, animals and ecosystems"
- "To prevent starvation of kangaroos during drought"

This framing is problematic for several reasons:

- Each option assumes that culling directly achieves the stated outcome (eg conserving ecosystems, preventing starvation). No evidence is provided, nor are respondents asked whether they believe these claims, nor if they would prefer non-lethal alternatives.
- The question and answers leave no space for respondents to express conditional or qualified views, such as support for non-lethal management or skepticism about the government's evidence.
- The sequence of options places the least ethically defensible reasons first (economic gain through farming or commercial harvesting) and the more ethically defensible reasons last (environmental protection, animal welfare). This ordering primes respondents to be more accepting of the latter options, subtly nudging them toward agreement.

In effect, the survey design manipulates rather than genuinely capturing community values. It reinforces the government's narratives by presenting contested rationales as fact, while excluding the opportunities for respondents to express alternative or more nuanced positions.

Another recurring question asks: "In comparison to other methods by which humans control wild animals, how humane is the culling of kangaroos?". In 2022, 60% answered "humane" or "very humane". Yet there is no evidence that respondents were informed of, or aware of, the specific methods used to cull kangaroos. Unsurprisingly, people would very likely assume government culling is humane when they are not told otherwise. This is not a reflection of values, but instead of the manipulation of the respondents' perceptions.

The surveys themselves are, in fact, just yet another vehicle for disseminating misinformation. By presenting the ACT Government's rationales (eg preventing starvation, conserving ecosystems, reducing collisions) as factual, they imply the legitimacy of these reasons, and the help to normalise lethal control. As we demonstrate elsewhere in this submission, evidence for these claims are weak, and non-lethal alternatives are largely ignored. As such, the framing of the questions in these surveys does not reflect the genuine values of the respondents and the community, but rather measures the success of the government messaging and disingenuous framing.

Additionally:

- There appears to be no investigation in any of the surveys into whether those who declined to participate differ significantly from the respondents.
- The 2008, 2012 and 2022 surveys were conducted in December, when many ACT residents would likely start going away on holidays, reducing representativeness.
- The 2008, 2011, 2015 and 2019 surveys all relied on landline numbers from the White Pages. This is baffling, especially in 2019, when much of the population had moved away from using landlines. This disproportionately captured older demographics - in 2019, 52% of the respondents were over 65, while only 21% were under 49.
- It is unclear whether Miromex Research or the ACT Government supplied the wording of the questions used in the surveys. Without any transparency around authorship and the qualifications of those providing the questions, the credibility of the surveys is compromised.

If the ACT Government genuinely sought to understand community values, it would ask questions such as:

- “Do you know how culling is conducted?”
- “Would you prefer non-lethal alternatives?”

Such questions would elicit ethical perspectives, preferences and values. Instead, the current surveys reinforce government messaging and obscure any public demand for humane, transparent and evidence-based alternatives.

In these ways, the Draft Plan and the ACT Government’s approach to the management of Buru fails to meet the principle outlined by Dubois et al ([2017](#)).

Principle 6: Systematic Planning

This international principle (Dubois et al [2017](#)) states that:

Decisions to control wildlife should be integrated into a program of long-term systematic management. If control actions are used on an ad hoc basis without being integrated into a systematic, long-term management program, any benefit is likely to be short lived and control actions may be used repeatedly without achieving a sustainable solution (Clayton & Cowan 2010). This is particularly problematic if control actions carry substantial animal welfare or other costs. For example, low-level culling of abundant or prolific animals can amount to senseless killing if populations rebound quickly.

Systematic planning of the killing of Buru has certainly been undertaken, in the form of successive Management Plans like this Draft Plan. Sadly, no such systematic planning has been undertaken for reducing the human impacts on ACT wildlife or biodiversity.

Moreover, as we outlined in the section above titled “[Buru & the environment](#)”, there remains no credible evidence that killing Buru has any measurable effect on the biodiversity of the CNP. Nor is there any monitoring to assess whether these actions reduce the impacts claims. In the absence of such evidence and evaluation, it is impossible to determine whether the killing of Buru actually achieves long-term management goals. For all the ACT Government can know, given this lack of monitoring, it amounts simply to the repeated and senseless killing of Buru, as advocacy and community groups have pointed out again and again over the decades.

Principle 7: Decision Making by Specifics Rather than Labels

This international principle (Dubois et al [2017](#)) states that (emphasis added):

*Decisions to control wildlife should be based on the specifics of the situation, **not negative labels applied to the target species**. When animals are labeled with terms such as introduced, abundant, and pest, broad approaches to control are sometimes advocated and little attention is paid to the specifics of the case. Wildlife control should not be undertaken just because a negatively labeled species is present....*

Animals assigned labels with negative connotations often receive less welfare consideration than valued species. In Canada, for example, wolves categorized as

overabundant are targeted in bounty programs to mitigate livestock conflicts (Proulx & Rodtka 2015) and culled when caribou populations decline from habitat loss (Hervieux et al. 2014). Apart from the ineffectiveness of these programs, the welfare cost and selectivity of the control methods are highly problematic; some wolves are poisoned with strychnine even though this contravenes national animal welfare guidelines (Proulx et al. 2015). Because vertebrate animals of similar cognitive and emotional complexity can be expected to have similar capacities for suffering (Mellor et al. 2009), **there is no reason consideration of animal welfare should depend on how a species has been categorized or the potential detrimental effects of the animal's presence or behavior.**

The Draft Plan represents a notable departure from the past language used to talk about Buru, being sure to reiterate the ecological importance of Buru and attempting to demonstrate concern for their welfare.

However, this is too little too late.

For years, the ACT Government has done incredible damage to the perception of Buru in the ACT, repeatedly framing them through negative labels such as “overabundant”, which has done a lot to shape public opinion in ways that justify lethal control. A small selection of the many cases of this are listed below (emphasis added):

- The formula that the ACT Government uses to determine how many Buru to kill each year is quite literally sourced from the following research paper by Hone & Snape (2024): *Hone, J, Snape, M (2024) Bias and precision of predicted densities of **overabundant** kangaroo populations. Ecological Management & Restoration 25, 182-188.*
- [In 2022](#), the (still current) ACT Conservator of Flora and Fauna said: ““We know that when kangaroos are overabundant, they can overgraze some of the ACT’s reserves that are home to critically endangered woodlands and grasslands.”
- [In 2013](#), the director for ACT Parks and Conservation said: “There is a significant volume of scientific evidence which demonstrates the impact that an overabundant kangaroo population has on other flora and fauna, including several local studies and countless national studies.”
- [In 2015](#), the director for ACT Parks and Conservation said: “Culling of overabundant kangaroos is currently the most humane method of population control available to the ACT Government as a responsible land manager.”
- The ACT Government has always relied heavily on this study by Fletcher (2007): *Fletcher D (2007) Managing Eastern Grey Kangaroos *Macropus giganteus* in the Australian Capital Territory: reducing the **overabundance**-of opinion. In 'Pest or Guest: the zoology of overabundance'. (Ed. D Lunney, P Eby, P Hutchings, and S Burgin).*
- [In 2022](#), the ACT Government City Services posted a video where a Senior Director in the Office of Conservation said: “However, when they’re **overabundant**, such as when predators like Dingoes are absent from the system, they can be really problematic.”
- The [ACT Pest Animal Management Strategy 2012–2022](#) includes a section on Buru under the “Management of Native Animals For Damage Reduction” section where it states: “Native animals are **similar to pest animals** (Chapters 3 and 4) in that they

can cause unacceptable damage to valued social, environmental and economic assets.”

Even if official documents now avoid such language, the historical record has already very much entrenched these biases in the mind of the public. And the ACT Government continues to benefit from this public misconception that it helped to create.

If the Government is serious about shifting its approach, it must do more than quietly retire this harmful language. It should explicitly acknowledge the damage that has been caused by its extensive historical use of the language, apologise for its role in perpetuating negative stereotypes, and commit to actively reversing this narrative.

The “One Welfare” approach

The Draft Plan states that:

One Welfare is a concept that emphasises the link between animal welfare, human wellbeing, biodiversity and the environment and promotes integration of all stakeholders to achieve management goals ([Pinillos et al. 2016](#); [Garcia 2017](#); [Kennedy et al. 2022](#)).

Instead of using One Welfare to in any way critically assess and improve the welfare outcomes for Buru, the Draft Plan retrofits the framework to justify practices already embedded in the existing Buru management program.

When recommending the inclusion of One Welfare, Sarah Legge highlighted two supposed benefits:

- *Recognise feedback from some stakeholders during the consultation carried out as part of this Review, who wished to see welfare addressed more coherently.*
- *Extend welfare considerations to encompass the welfare of all animals, people, and the environment, and allow contrasting perspectives about which welfare to prioritise to be considered within the same framework.*

These statements reveal the real intention behind including the One Welfare framework in the Draft Plan. The framework is not being included to genuinely consider or improve Buru welfare outcomes. Rather, it is included as an attempt to placate dissenters, so that the ACT Government can claim it has listened to the views of stakeholders who care about Buru welfare, while continuing to operate as business as usual. Sure, the One Welfare framework will “allow contrasting perspectives” to be considered. But, it is obvious whose perspective “about which welfare to prioritise” will ultimately come out on top.

Using the One Welfare framework is just a convenient tool to sidestep criticism. It gives the appearance of caring about Buru welfare and listening to all community and scientific viewpoints, while ensuring that lethal management remains the default.

Conveniently, Legge notes that:

All the practices and adaptations to enhance welfare outcomes that have been incorporated into the existing kangaroo management program would be covered by this approach (e.g., a culling season to avoid shooting females with large pouch young or small young-at-foot; stringent requirements for licensed shooters; prioritising culling to occur only in reserves where this will have conservation benefit; small reductions in kangaroo population size each year, rather than less frequent but very large culls, resulting in fewer kangaroos being killed overall; etc.

This again makes it clear that the inclusion of One Welfare is not being used as an opportunity to meaningfully assess welfare outcomes in order to shape a management approach. Instead, the existing management approach is being fit in to the One Welfare framework.

Human-centric concept

Rather than being a concept that has animal welfare at its core, the One Welfare approach is centred around human benefit. It is noted by Pinillos et al. (2016b) that:

A One Welfare approach is necessary to appreciate and utilise fully the direct and indirect benefits of animal welfare improvements to human wellbeing and also the links to the environment.

Clearly, “animal welfare improvements” are primarily being considered as far as they have “direct and indirect benefits” to “human wellbeing”.

Unequal consideration of the three “Welfare Themes”

The Draft Plan establishes three “Welfare Themes” - Buru Welfare, Environmental Welfare, and Human Welfare.

The Outcomes that the Draft Plan links to each Welfare Theme with solid lines in Figure 2 are:

- Buru Welfare:
 - The management of Buru in the ACT meets high animal welfare standards
- Environmental Welfare
 - Buru remain an important component of grassy ecosystems
 - Buru grazing maintained at a level that provides suitable habitat conditions for other species
- Human Welfare
 - Nggunawal values and knowledge are incorporated into ACT Buru programs
 - Buru populations maintained at economically viable levels on rural and horse paddock properties
 - Buru carcasses from culling are utilised to reduce waste and provide community benefit
 - The incidence of vehicle collisions are reduced in the ACT
 - Public confidence is maintained in Buru management through clear and transparent communication

The distribution of outcomes clearly reveals the Draft Plan’s priorities. Five outcomes primarily serve Human Welfare, two primarily serve Environmental Welfare, and only one is dedicated to primarily serving Buru Welfare. This imbalance is deliberate, and ensures that human interests dominate the decision-making in this Draft Plan, while Buru welfare is reduced to a token consideration.

The wording of the sole primary Buru Welfare outcome is: “the management of Buru in the ACT meets high animal welfare standards.” Why, instead, is it not simply: “the welfare of Buru is in the ACT is maintained”? The answer is obvious: it is because the chosen wording presupposes that “management” (which, in practice in the Draft Plan means “killing”) is inevitable. The welfare of Buru is only considered within the narrow confines of that predetermined decision, and the ACT Government is unwilling to allow for the consideration of any other outcome than that.

The Interim Outcomes that the Draft Plan links to Buru Welfare further narrow this framing:

- Buru shooting is conducted according to animal welfare legislation, codes and standards
- Management methods based on best scientific knowledge, animal welfare and cost effectiveness
- Injured sick or accidentally confined/trapped Buru are managed in a humane way

As discussed in an earlier section of this submission, compliance with welfare codes is meaningless given how low they set the bar for welfare, and “best scientific knowledge” is manufactured to support the killing program. However, even setting those two facts aside, these Interim Outcomes only address Buru welfare at the moment of killing. They do not consider the broader impacts of culling on Buru lives, families, or long-term wellbeing.

Additionally, contrary to the ACT Animal Welfare Act amendment recognising animal sentience, none of these Interim Outcomes address Buru’s mental or psychological welfare.

The Draft Plan has sections discussing each Welfare Theme in more detail. The welfare impacts that they mention under each theme make the imbalance of priorities even clearer.

This table provides a list of all of the welfare considerations that are mentioned for Buru and Humans respectively.

Buru Welfare considerations	Human Welfare considerations
<ul style="list-style-type: none"> ● The method used for: <ul style="list-style-type: none"> ○ Shooting Buru ○ Killing joeys ○ Fertility control ● Health and behavioural impacts of fertility control (which they claim are minimal) ● Reducing welfare impacts on dependent joeys (which they claim they 	<ul style="list-style-type: none"> ● Community concerns about lethal management methods ● The impacts to humans of Buru fertility control including: <ul style="list-style-type: none"> ○ Economic costs ○ Emotional distress ● The impacts to humans from vehicle collisions with Buru including: <ul style="list-style-type: none"> ○ Distress

<p>successfully achieve)</p> <ul style="list-style-type: none"> ● The need for frequent culls to reduce the overall number of Buru that are killed ● Buru facing starvation during drought conditions 	<ul style="list-style-type: none"> ○ The welfare of the driver ○ The safety risks for those attending to Buru who have been hit by vehicles ○ The safety risks for those euthanising large, injured Buru who have been hit by vehicles ● Emotional distress to humans about: <ul style="list-style-type: none"> ○ Ecosystem degradation by Buru ○ The killing of Buru ○ Poor livestock welfare during dry periods when grazing competition between stock and Buru is high ● Cultural welfare for Ngunnawal people ● Economic welfare of primary producers ● The human need for urban expansion ● The social cost associated with human-Buru interactions
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The sheer volume of Human Welfare considerations they identify compared to Buru Welfare demonstrates the Draft Plan’s human-centric approach. Given that the Draft Plan is solely focussed on the killing of Buru, how is it that human welfare is so much more thoroughly considered when it is Buru who are literally paying with their lives? How is the emotional distress caused to humans by ecosystem degradation or the welfare of the animals humans who are *farming animals* (for their *economic benefit*) worthy of more consideration than the physical and psychological suffering of Buru due to over a decade of intense slaughter? It is just baffling that Buru Welfare is only addressed in the Draft Plan to the minimum extent necessary to claim it has considered it, while human concerns are explored in exhaustive detail.

Even the Buru Welfare points that *are* addressed only highlight aspects that support the Draft Plan’s killing agenda. For example, starvation during drought is emphasised because it can be used to argue that culling is “necessary” for the welfare of Buru. Yet, many other welfare dimensions (such as psychological trauma, social disruption, long-term stress) are ignored, because the ACT Government knows that by acknowledging them it would lead the public to question more deeply whether the harms of culling outweigh the supposed positives.

The Draft Plan does an impressively thorough job of cataloguing every possible *negative* impact Buru might have on humans. But, it totally fails to mention any *positive* contributions Buru make to human welfare. Some examples that could be considered include:

- The feelings of joy, wonder and a sense of connection to nature that encounters with Buru can bring
- For community members of the Bush Capital, Buru foster pride and connection to place, which helps strengthen community wellbeing and sense of identity
- Wildlife watching can reduce stress and improve mental health. Seeing Buru in their natural environment can foster mindfulness
- Communities often rally around protecting the local Buru populations, which helps strengthen social ties and shared purpose

- Buru can attract domestic and international tourists, and leaning into wildlife tourism can contribute to the local economy and create jobs
- Buru support healthier ecosystems which in turn benefit humans through cleaner air, water, and more resilient landscapes
- Buru grazing of grasslands reduces fire hazards in suburban and per-urban environments
- The presence of Buru enhances recreational opportunities and encourages outdoor activities, which boost the community's wellbeing
- Implementing coexistence strategies for Buru such as wildlife corridors and wildlife crossings can improve the safety and wellbeing of all wildlife, which in turn benefits the environment and therefore humans

As can be seen from the list above, and the information in this submission about the welfare impacts of culling, there are *so many* positives to both Buru *and* Human welfare to choosing coexistence over killing. We strongly reject the negative picture that the Draft Plan paints of Buru and their relations with humans.

Ultimately, if the Draft Plan genuinely considered Buru welfare, then its ultimate goal would be to eliminate the need for killing altogether. It would choose a welfare framework that genuinely considered Buru welfare, and it would set a clear objective towards reducing the number of Buru killed to zero. The absence of such a goal is itself evidence that Buru welfare is not a true priority for the ACT Government.

Killing by rural landholders

The Draft Plan points to the evidence that:

Buru management programs remove about 1.6% of the total population in the ACT through conservation culling, and 7.5% through rural culling (Table 7, Appendix 6.3.2.2).

Rural culling accounts for the death of more than four times the number of Buru than conservation culling. It is for this reason that greater transparency is required around the killing of kangaroos in rural culls, and that the following recommendations should be implemented.

Evidence of economic impact

The Draft Plan claims that managing Buru populations on rural lands and horse paddocks is essential to protect the “economic viability of these lands”. It claims that key considerations when “managing high density populations of Buru on rural lands and horse paddocks” are reducing grazing competition with livestock and preventing fence damage. However, no evidence is ever provided that Buru have any impacts, let alone “serious impacts” as the Draft Plan claims, on the “economic viability” of rural land.

Lack of evidence

The only two statements made in the Draft Plan that provide a source for the claims of competition with livestock are the following, and, conveniently, they are both references back to the government’s own [2010 Kangaroo Management Plan](#):

- *Research into the level of grazing competition that exists between Buru and stock has found variations between the region and culling status of the population (ACT Parks Conservation and Lands 2010).*
- *Buru grazing impact varies between the 17 horse paddock complexes and has had a severe impact on horse agistment function in some cases. The capacity of several complexes have been significantly reduced due to high Buru grazing, while in another complex lower Buru grazing pressure has allowed for greater capacity for horses (ACT Government 2017b).*

Regarding these two claims, the [2010 KMP](#) provides the following as evidence:

- *The key issues for rural lessees are competition with livestock for pasture (Shepherd and Caughley 1987) and damage to fences. Other impacts include kangaroo grazing on improved pasture and fodder crops; the potential for land degradation related to over-grazing by livestock, kangaroos and feral animals; and competition with stock for drinking water in drought conditions (Pople and Grigg 1999).*
- *Due to competition from kangaroos, one horse paddock complex in the ACT has closed and the capacity of another has been reduced from 80 to about 20 horses over a 14 year period. Over this time, the capacity of a similar complex, where kangaroo grazing is not a significant issue, has increased. Capacity has been significantly reduced in another four complexes.*

Shepherd and Caughley (1987) were both closely involved in establishing the commercial kangaroo industry in NSW, so this source is far from unbiased, as they had strong incentive to conclude that kangaroos cause some kind of issue for farmers. Pople and Grigg (1999) is actually a federal government report on commercial harvesting - so not only is this source not evidence of anything in and of itself, it is also incredibly biased. Regarding the horse paddock claims, this is purely allegations, and given there is no original source provided it does not appear that there is any credible evidence to indicate that it was Buru grazing that caused this issue. Regardless, it is also not clear if any coexistence measures were utilised, and whether these would have solved the issues, had any actually been identified.

Sarah Legge (2024) reinforces this critique, stating that during the process of her review, she “was not provided with any data on changes in livestock density, or pasture condition (if these data exist).” As a result, she said that “it is challenging to assess whether kangaroo culling on rural lands is achieving the objective of maintaining the economic viability of properties.”

Legge (2024) also pointed out that in the 2017 KMP, “economic outcomes for farmers are assumed based on past research but not directly monitored or used to adapt management.”

Given the above, it is abundantly clear that the ACT Government is not able to provide any evidence at all that Buru grazing impacts rural landholders. It appears that the Draft Plan relies only on anecdotal accounts from rural landholders and self-referencing government reports, rather than any credible evidence.

Killing approved based on cultural perceptions

Boom (2012) observed that kangaroo management programs are built on the assumption that kangaroos are “pests”, however that this is simply a cultural perception that lags behind scientific understanding. This is evident in the ACT, where rural landholders’ views of Buru as competitors to the animals they are farming is what clearly drives policy, without any verification.

There is no system currently in place to confirm whether claimed damages are real, nor to test whether killing Buru actually reduces any of these claimed damages. As Boom (2012) notes: “Governments continue to assume that the killing is necessary without any clear justification.”

The framing of Buru as a problem ignores the ecological role of Buru, their sentience, the fact that we stole the land that they have been on for millions of years, and their cultural significance to First Nations people.

Ethical principles ignored

The International Principles for Ethical Wildlife Control (Dubois et al 2017) has a principle called “Justification for Control”. It states that:

The need for wildlife control should be justified with evidence that substantial harm is being caused to people, property, livelihoods, ecosystems, and/or other animals.

As demonstrated, in regards to the rural cull, the ACT Government provides no such evidence.

If the Draft Plan wishes to claim to align with these principles, it must:

- Require rural landholders to provide evidence of impacts before licences to kill are granted.
- Require annual evidence that impacts are being reduced by killing Buru before licences are renewed.
- Replace anecdotal claims with independent, peer-reviewed data.

Additionally, another one of the International Principles of Ethical Wildlife Control, “Clear and Achievable Outcome-Based Objectives” ([Dubois et al 2017](#)), states that:

Ethically defensible decisions to control wildlife require clear objectives and sound evidence that the proposed methods can achieve the objectives. Too often these requirements are not met. For example, eradication of an unwanted population sometimes fails to achieve the intended ecological benefit (e.g., Bergstrom et al. 2009).

And goes on to say:

The objectives of wildlife control should be specific, measurable, and outcome-based, where the outcome relates to the desired reduction of harm ... rather than simply reducing the number of target animals (Clayton & Cowan 2010).

This is a perfect parallel to the ACT rural killing of Buru. The Buru are considered an unwanted population by the ACT Government and rural landholders, and there is no clear indication that killing them achieves the claimed economic benefit. As Legge ([2024](#)) pointed out, there is no data provided upon which to assess whether the rural culling is having any meaningful outcome.

The ACT Government must urgently develop specific, measurable, outcome-based objectives for the rural cull, rather than its current approach of simply setting quotas for the number of Buru that can be killed.

Alternative approaches

The [2010 KMP](#) mentioned that (emphasis added):

*Kangaroo populations are considered by rural lessees to have a negative impact on the economic viability of rural properties as one of the components of total grazing pressure. Consideration of this economic harm has been factored into a number of previous and current ACT Government policies (**provision of rental rebates, construction of electric fences at reserve boundaries, and culling licences**).*

If Buru do cause impacts (or if perceptions of impact remain strong in rural landholders, despite evidence indicating otherwise) then rental rebates are a far more ethical solution than issuing licences to kill. The ACT Government should provide compensation for rural landholders based on the number of Buru they allow to graze on their land. This keeps the

rural landholders satisfied and not feeling out-of-pocket from any perceived “impacts” by Buru, while also respecting the right of Buru to the land and to their lives.

Damage to fencing

The most significant solution to the issue of damaged fencing would be for the ACT Government to provide funding to rural landholders to replace all of their fencing with wildlife-friendly fencing.

Buru do, very sadly, regularly get caught in loose/broken fencing and barbed wire. In the ACT, given Buru cannot be rescued or rehabilitated, this always results in them being killed. All barbed wire should be removed from ACT properties, to prevent Buru getting caught in it and therefore injuring themselves and damaging the fence. Wildlife gates should be installed in all new fencing so that Buru (and other wildlife) have safe passage through the fences, rather than needing to jump over them and risk getting caught and therefore injuring themselves and damaging the fence. And finally, the top wire should be coloured white, so that Buru can see the fence and accurately judge the height if trying to hop over it.

Until all fencing is replaced with wildlife friendly fencing, the ACT Government should provide compensation to rural landholders for any damage that is done as a result of Buru getting caught in it.

Recommendations:

- 1. Research must be funded that engages rural landholders and independent scientific experts to work together to assist rural landholders to find sustainable solutions for coexistence and improved landscape resilience.**
- 2. Proof of damage or other economic impact must be required prior to authorisation of shooting being granted, and annual updates from rural landholders must be required on whether killing Buru has improved the situation.**
- 3. The ACT Government must urgently develop specific, measurable, outcome-based objectives for the rural cull, rather than its current approach of simply setting quotas for the number of Buru that can be killed.**
- 4. In place of rural culling, a compensation or incentive scheme must be developed whereby rural landholders are given financial compensation in return for the number of Buru they allow to graze on their land.**
- 5. In place of rural culling, funding must be provided to rural landholders to replace all of their fencing with wildlife-friendly fencing (including wildlife gates, a white top wire, and no bared wire). In the meantime, compensation must be provided to rural landholders for any proven instances of damage to their fencing resulting from Buru getting caught on it.**

Requirement for trials of coexistence methods

The Draft Plan states that “rural land managers in the ACT rely primarily on culling to reduce Buru grazing pressure”. It further notes that ACT Government staff support landholders “by providing advice, running the annual shooter testing and conducting audits.”

It is clear that the ACT Government provides no meaningful alternatives to rural landholders other than killing. Rural landholders are not actively assisted to implement non-lethal strategies, nor are they encouraged to explore coexistence approaches.

The International Principles for Ethical Wildlife Control ([Dubois et al 2017](#)) has a principle called “Modifying Human Practices” that says:

Human–wildlife conflicts arise from human activities ... and should be prevented and mitigated by altering human practices wherever possible and by developing a culture of coexistence.

By resorting immediately to lethal control, the ACT Government contradicts these principles. Rather than fostering coexistence, it is clear that the government entrenches killing as the default for ACT rural landholders.

If the ACT Government wishes to claim that it aligns with the ethical principles, it must implement the below recommendations.

Recommendations:

- 1. The ACT Government must work directly with rural landholders to provide regular education on coexistence with Buru and on implementing non-lethal coexistence strategies.**
- 2. Evidence must be required that landholders have genuinely attempted non-lethal approaches to land management before licences to kill are granted.**

Review of the rural cull

The Draft Plan sets Outcome K.2 as:

Evaluate the rural culling program every 5 years.

The performance indicator attached to this outcome is:

Survey of rural landholders completed every 5 years to assess how effectively rural culling is administrated and if landholders are satisfied that their level of Buru management is achieving their land management goals.

This is wholly inadequate. A genuine evaluation of the rural cull must assess measurable objectives, not simply administrative efficiency or landholder satisfaction.

As we discussed in the section above titled “Evidence of economic impact”, landholder satisfaction is irrelevant to determining whether culling has achieved its stated goals. Perceptions of impact are not evidence of actual impact. Without independent data that can be assessed against specific, measurable, outcome-based objectives, it is impossible to evaluate rural culling.

Recommendation:

- 1. The evaluation of the rural cull must be assessed against the specific, measurable, outcome-based objectives for the rural cull that are developed as per our previous recommendation.**

Independent veterinary audits for rural cull

The Draft Plan commits to independent veterinary audits of the “conservation” cull every three years, in addition to annual audits by ACT Government veterinary staff. However, for the rural cull - which kills more than four times as many Buru each year - it proposes only annual audits conducted by government veterinary or regulatory staff.

This disparity is unacceptable. The rural cull is far larger in scale than the “conservation” cull, yet it lacks the independent oversight applied to the “conservation” cull. Without external scrutiny, there is no assurance that rural shooting practices meet even the bare minimum animal welfare standards outlined in the National Code.

To ensure that *all* kangaroo shooting in the ACT is undertaken in accordance with current animal welfare standards, independent veterinary audits must also be conducted for the rural cull, at intervals equivalent to those applied to the “conservation” cull. Anything less undermines transparency and public confidence.

Recommendation:

- 1. Independent veterinary audits of the rural cull must be conducted at intervals equivalent to those applied to the “conservation” cull, and the audit reports published online in the same manner as for the “conservation” cull.**

Transparency of rural landholder cull statistics

The Draft Plan sets one of the performance indicators for Outcome L.1 as:

Data on number of authorisations issued, number of Buru authorised to be shot and number of Buru shot collated annually following the conclusion of the culling seasons and aggregate data published in future updates to this Plan.

This commitment is inadequate and is contrary to the Draft Plan’s claimed commitments to transparency and communication. Publishing the aggregate data only once every five years when the Plan is next updated does not provide timely or transparent reporting. Such delays prevent the ACT community from understanding the true scale of Buru killing on rural land.

Earlier this year, one of our members requested annual data on rural landholder culling and was told they would need to wait for the Humane World for Animals “Licence to Kill” 2025 report. Relying on a third-party organisation to release government statistics is unacceptable. Most community members will never see these reports unless they actively seek them out.

If the ACT Government wishes to genuinely claim a commitment to timely and transparent reporting, then the data for the annual rural culls must be:

- Published annually, immediately following the conclusion of the culling season, in the same way as the “conservation” cull.
- Made publicly available on the ACT Government website, in a prominent and accessible location, in the same way as the “conservation” cull.
- Presented in a clear, accessible format so that the community can fully understand the extent of Buru killing on rural land.

Recommendation:

- 1. Rural culling data must be published annually on the ACT Government website, in a manner that is equally as accessible and prominent as the “conservation” cull data.**

Male-only culling season

Rural landholders should be required to report a breakdown of how many males and how many females they killed. This is particularly relevant during the “male only” culling season where they are not meant to be shooting females. Any accidental killing of a female during this time must be reported.

Recommendation:

- 1. Rural landholders must be required to report the number of males and females they kill, including during the “male-only” culling season, and this data must be published annually on the ACT Government website.**

Reporting of number of joeys that are killed

It appears that there is no requirement for rural landholders to report how many joeys they kill. This is wholly unacceptable and must be a requirement so that the public can be aware of the true number of Buru being killed by rural landholders.

Recommendation:

- 1. Rural landholders must be required to report the number of joeys they kill, including a breakdown of whether they are furred or unfurred and what method of killing is used, and this data must be published annually on the ACT Government website.**

Commercial killing of kangaroos

The Draft Plan states that:

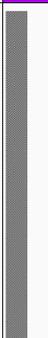
The ACT has no commercial Buru harvesting. Previous analysis of this issue has concluded that a commercial harvesting operation would not be pursued in the ACT because the costs of establishing and administering such a program would be high and given the relatively small number of Buru involved, it would not be a cost-effective option.

SCK is grateful that the plan reaffirms the ACT Government's stance that there would not be killing of Buru for commercial purposes.

Recommendation:

- 1. The ACT Government must continue to prohibit the commercial killing of Buru in the ACT.**

Urban Development Sites

Urban development sites		ACT Government, Commonwealth Government or private land developer	varies	<p>Urban development sites are areas where development is occurring for urban expansion and often impacts the availability of Buru grazing area. This poses concerns for the local Buru populations that exhibit strong fidelity to their home range (ACT Government unpublished data), particularly in areas of urban infill. This can impact on both Buru welfare and grassy ecosystem conservation values. Managing Buru welfare should be a component of the development plan for future sites including ensuring Buru are not fenced into construction areas, safe dispersal routes are maintained, and vehicle collision risk is mitigated. Consideration should be given to culling where it is preferable to having Buru subject to trauma such as road collisions, dog attacks and starvation, and where additional grazing pressure on undeveloped adjacent land has detrimental impacts on grassy ecosystem conservation.</p> <p>Policies:</p> <p><i>Managing Buru welfare will be included in initial planning for development sites.</i></p> <p><i>In development sites adjoining high conservation grassy ecosystems Buru populations will be managed to achieve grassland target densities.</i></p> <p><i>In other development sites Buru populations will be managed to achieve the best welfare outcome for the Buru.</i></p>
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For years, the ACT Government has denied that killing of Buru is undertaken due to development, despite repeated concerns raised by numerous animal rights groups and other concerned Canberrans. Since 2009, tens of thousands of Buru have been killed in reserves throughout Canberra, many of which now border residential or development areas.

The following are some examples of instances where it appears that Buru were killed in connection to development:

- **Red Hill Nature Reserve**

The Buru who live on this reserve remained out of the conservation cull program until 2022. At the same time, a development proposal for 125 retirement dwellings to be built on the golf course, which is situated inside the reserve, was put forward. This proposal includes some of the reserve land being used for the development. This appears to be more than mere coincidence that the same year Buru started being killed here, and at scale, is the same year a DA is proposed. SCK is not the only group who has raised the alarm about this DA, with the Friends of Federal Fairways (FOFF) [taking the ACT Plannings' conditional approval of the DA to ACAT](#). FOFF has highlighted that 770 trees including 491 protected trees and 18 hollow-bearing trees will be destroyed to make way for the development and buildings are planned within metres of known Gang-gang nesting trees. FOFF also raised concerns about the impact on Buru, stating that the developer has no management plan for the Buru, which FOFF says will lead to Buru being killed so as to not interfere with the development.

- **The suburb of Lawson**

It is not just SCK who can see that suburbs or other developments have been built on areas where previously kangaroos have been killed to supposedly protect endangered species and grasslands (see below screenshots). In the case of Lawson, many Canberrans remember the [infamous daylight trapping and killing of kangaroos at the Belconnen Naval Transmission Station](#) which made international news in 2008 (photos included below). In 2013, the suburb of Lawson was built.



- **Callum Brae Crematorium**

The development proposal for this crematorium was approved this year despite significant community backlash, including from Friends of Callum Brae Nature Reserve and the Conservation Council ACT, regarding the impact this would have on the nature reserve and the animals that reside in it. Since the beginning of the conservation cull program, the ACT Government has killed over 1500 kangaroos here to supposedly protect the endangered animals and grasslands.

Callum Brae Nature Reserve	140	200	252	100	94	126 (45)	284 (103)	0 (0)	162 (72)	0 (0)	Combined w Jerrabomberra West in 2019 Combined w West Jerrabomberra Valley in 2020					
Callum Brae AND Jerrabomberra West Nature Reserves	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	584 (219) Combined w West Jerrabomberra Valley in 2020					
West Jerrabomberra Valley (Jerrabomberra West AND Callum Brae AND Mt Mugga Mugga/Isaacs Ridge Nature Reserves combined in 2020)	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	967 (361)	0 (0)	131 (38)	0 (0)	0 (0)	650 (298)

- **The suburb of Whitlam**

This suburb is adjacent to Kama Nature Reserve and across from the Pinnacle Nature Reserve. These reserves have endured significant killing of the Buru who live there. Since 2009, 387 Buru have been killed in Kama Nature Reserve and 1120 Buru killed at the Pinnacle. Another important factor to mention in relation to Whitlam is the fact that it is bordered by William Hovell Drive, a significant Buru collision hotspot. [The Conservation Council has consistently raised concerns](#) with the ACT Government that the buffer between Kama and Whitlam was not of sufficient size to prevent impacts on species in the Kama Reserve, due to the risk of urban edge effects such as noise, weeds and introduced animals. On the one hand, the ACT Government claims that it kills Buru to protect endangered species and grasslands. While on the other hand, it allows developments like these to encroach on these very same reserves they are supposedly trying to protect. In the [Conservation Management Advice Report 2024](#), it even acknowledges that ‘a significant proportion of this KMU has been withdrawn from rural lease in recent years for the development

of the Whitlam suburb. Kangaroo population density may therefore increase in this KMU over the coming years, which will require careful monitoring'. Admitting that this suburb has taken away key Buru habitat, forcing them into a smaller home range meaning that because of this suburb, the ACT Government will find this as a reason to have to kill more Buru. The [Conservation Management Advice Report 2025](#) also acknowledged that the KMU had to be altered due to the suburb of Whitlam expanding into the eastern boundary of Kama Nature Reserve. This creates the link that they have killed Buru because of the development of the suburb of Whitlam.

- **William Hovell Drive duplication project**

Similar to the above paragraph relating to the development of the suburb of Whitlam.

The Draft Plan now openly acknowledges what we have suspected all along: that Buru are in fact killed for the purpose of urban development. The Draft Plan states that Buru populations will be “managed” - in other words, culled/killed due to urban development sites. This is unacceptable and completely at odds with respecting Buru and Buru welfare.

The Draft Plan also states that:

Managing Buru welfare should be a component of the development plan for future sites... Consideration should be given to culling where it is preferable to having Buru subject to trauma such as road collisions, dog attacks and starvation, and where additional grazing pressure on undeveloped adjacent land has detrimental impacts on grassy ecosystem conservation.

To claim that culling as a result of a development plan is ever necessary for the reasons listed is absurd. Road collisions should not be an issue, as all new development should be providing safe wildlife corridors and safe road crossing options. This would also subvert the risk of starvation and additional grazing pressure (in addition to the reasons listed in the section of this submission titled “Buru & the environment”). Finally, to state that culling is necessary to prevent Buru being subject to *dog attacks* is frankly mind blowing. The ACT Government should be enforcing its rules around dogs being on leashes, especially when near areas that are known Buru hotspots.

Co-existing should always be the first point of action, not resorting to killing animals just because they are an inconvenience to the development. Additionally, if development is going to cause adverse welfare outcomes for Buru, then it should not be allowed to proceed. The plan seems to suggest where development would create adverse welfare outcomes for Buru, it can still proceed, but as a result Buru would be killed.

Recommendations:

- 1. Co-existing must be prioritised when urban development is proposed. All developments should explicitly assess the presence of Buru in the area and ensure that the development will not have adverse impacts on their lives and welfare. Where such impacts cannot be avoided, the development should not proceed.**

2. Any planned killing of Buru in connection to urban development must be announced publicly before it occurs. The number of killed Buru must also be publicly available afterwards, including pouch young.

Habitat connectivity and wildlife corridors

The Draft Plan states in Table 2 that:

Maintaining habitat connectivity is considered during urban planning and development. The welfare of Buru is considered during and after development.

Habitat connectivity and Buru welfare are not things that should merely be *considered*. These must be actively *required* as part of all new urban planning and development.

Recommendation:

1. **Habitat connectivity must not just be *considered*, it must be *required* in all new development.**

Wildlife carers

Rehabilitation and release of Buru, including orphaned young	<p>Licences will not be issued for the rehabilitation and release of any Buru in the ACT. This is:</p> <ul style="list-style-type: none"> • due to animal welfare concerns; • due to the need for the consistent management of Buru across the ACT, Buru are an abundant species and populations are culled to reduce environmental and economic impacts; • to reduce the risk of injuries to humans from large male Buru that were originally hand reared.
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SCK does not support the Draft Plan's position on the rescuing and rehabilitating of Buru, and we are not alone in our views on this, with a number of wildlife carers in the ACT opposed to this extraordinary policy. No other jurisdiction has such a policy as this because these "justifications" are pretty baseless. Why the ACT continues to be an outlier on this issue is baffling, particularly when it is the ACT who was a leader in recognising animal sentience into law. Every animal should be given a chance at life. Recently, SCK posted a video to our social media pages highlighting this unjust policy, and this video ended up reaching over 80,000 people, attracting hundreds of comments from people who were shocked by this situation. We have chosen to include some of the comments below to highlight what people think of this policy:

I am appalled that wildlife carers where you are are not able to carry out the very basics of the work they are meant to do. This is so awful! I'm so sorry for the animals and those who live nearby who love them.

This breaks my heart and makes me so incredibly angry at the same time.

What backwards rules! I don't understand why carers can't assist? Craziness and heartbreaking figures.

I'd be ignoring the law if I had the means to help. What kind of rule is that?

It's an unacceptable arrangement when there are qualified, caring people available and willing to help, rescue and ease suffering. It's got to change!

On the 'Living with Kangaroos' webpage, it lists some reasons as to why the ACT Government does not permit carers to rescue and rehabilitate Buru, and we have unpacked those below:

Conservation status

The ACT Government claims that there is no conservation justification for rescuing and rehabilitating Buru which is at odds with the fact that it allows the rescue, rehabilitation and release of the Red Neck Wallaby, Swamp Wallaby and Common Wallaroo who all share the same conservation status as the Eastern Grey Kangaroo and are also killed in some reserves during the culls. If conservation status truly mattered, no species listed as "least concern" would be allowed to be rescued in the ACT, yet they are every single day, whether

they be birds, possums, echidnas, wallabies or wallaroos. The ACT's own licensing rules show that animals are rehabilitated based on welfare needs; not conservation priorities. It is contradictory to apply this logic only to Eastern Grey Kangaroos.

Risk of injuries from hand-reared large male kangaroos

Notwithstanding the odd "precautionary note" on page 85 of the Draft Plan which itself states that "it is unlikely that a verifiable connection between a particular instance of aggressive behaviour and hand rearing would be able to be made" - the inference that hand reared male kangaroos have a risk of becoming aggressive and injuring humans is unsubstantiated, unscientific and based on outdated stereotypes. Male kangaroos are no more dangerous hand-reared than when wild. If there were widespread safety issues with hand-reared males, other states and territories would have similar bans, but they don't.

There are specific standards that wildlife rescuers and rehabilitators follow to ensure that hand-reared wildlife do not become too humanised. The [ACT Animal Welfare \(Welfare of Native Wildlife – Rescue, Rehabilitation and Release\) Mandatory Code of Practice 2023](#) already includes guidelines to address the avoidance of animals becoming attracted to humans (i.e. humanised) or to sights, sounds or smells that are specific to captivity (i.e. imprinted):

Humanising and imprinting

S5.19 The carer must:

- a) avoid bonding closely with wild native animals that are being rehabilitated; and
- b) avoid contact with the animal more than is necessary to provide appropriate care; and
- c) minimise exposure of native animals to domestic pets and other people.

The [NSW Code of Practice](#) includes guidelines just like these, and NSW does not have any issues with abnormal aggression of male kangaroos towards humans.

Hand-reared animals have a much higher death rate than naturally reared animals if released to the wild rather than protected environments

This logic doesn't add up, as the death rate is 100 per cent when you don't allow these animals even a chance at rehabilitation. An orphaned joey in the wild has a zero per cent chance of survival without intervention. By allowing wildlife carers to rescue and rehabilitate them, it gives them a chance of survival. To deny their rehabilitation because they face "survival challenges" after human-caused trauma is ethically backwards. Additionally, this argument is not used to prevent the rescue and rehabilitation of other native species in the ACT - even ones that have a far lower survival rate than Buru (e.g. small birds). This indicates that this is just a policy bias and is not based on any scientific principles.

They are often more vulnerable to predators such as dogs and foxes as they have not learnt an appropriate recognition and flight response

Predator awareness training is already standard practice among licensed carers in other states and territories. Carers follow protocols such as:

- Minimal human imprinting;
- Encouragement of mob behaviours
- Controlled exposure to sounds, scents, and natural environments; and
- Joining nearby wild kangaroo groups before full release.

The ACT Government could ensure that these same protocols are followed by wildlife carers in the ACT to alleviate the concerns about vulnerability to predators post release. But, at the end of the day all wildlife, including kangaroos, face risks from predators - but this is not a reason to not give them a chance at rehabilitation.

Recommendations:

- 1. ACT Wildlife carers must be permitted to rescue, rehabilitate and release Buru and their joeys. Release sites can be outside of the city in areas such as Namadgi National Park, or agreements can be made with carers in NSW to release the Buru in already designated release sites.**
- 2. The precautionary note paragraph on page 85 of the Draft Plan must be removed.**
- 3. In lieu of the ACT Government reversing the ban on wildlife carers in the ACT being able to rescue and rehabilitate Buru, a live tally of the number of joeys that have been transferred into care in NSW must be available on the ACT Government 'Living with Kangaroos' webpage.**

Urban Wildlife Officers

Interim Outcome C - Injured, sick or accidentally confined/trapped Buru are managed in a humane way	
Activity	Performance indicator
<p>C.1 ACT Government will maintain an Urban Wildlife program that attends to the welfare of Buru that are injured, sick or accidentally confined/trapped in the urban environment, if necessary, by euthanasia in accordance with the National Code of Practice, established guidelines for the management of urban wildlife and relevant ACT Standard Operating Procedures.</p>	<p>Urban Wildlife program is resourced 7 days per week for the duration of this plan.</p> <p>Injured, sick or accidentally confined/trapped Buru are attended to in a timely manner.</p> <p>Reason and action undertaken recorded for each attendance.</p>

SCK is generally supportive of the intent of Interim Outcome C. Canberra is sadly a significant hotspot for kangaroo collisions with vehicles and there have been many stories shared by members of our group and from members of the public about the significant wait time for an Urban Wildlife Officer to attend an injured kangaroo to euthanise them. A small story which highlights this problem is shared below:

I came across an injured kangaroo on Erindale Drive at 6:30am one morning and called for the ranger straight away. I waited nearly 2 hours and in that time this poor large male kangaroo was suffering with a broken leg and constantly trying to get up, he had such a strong will to live. This was until about 8:15am when he passed away and no ranger ever turned up. This poor kangaroo suffered for far too long before he died.

The Appendix of this submission includes screenshots of posts on Canberra Noticeboard where people have shared their distress of injured kangaroos that have been hit by cars. These screenshots also include instances where people did not know who to call and people who experienced extremely excessive wait times for a ranger to attend.

While supportive of the intent of Interim Outcome C, we have some concerns with how the performance indicators will be measured and have recommendations for further improving this outcome, which is discussed below:

On duty/on call Urban Wildlife Officers

To our knowledge, outside of business hours, there is only one Urban Wildlife Officer on call to service the whole of the ACT region. This should be increased to at the very least two on-call, one for the northside and one for the southside, due to the fact that the rate of collisions is higher outside of business hours (as Buru are more active during dawn & dusk). The ACT Government's webpage '[Living with kangaroos](#)' even itself indicates that the peak time for crashes is between 5.00pm to 10.00pm. This makes even more of a case for more than one Urban Wildlife Officer to be on-call, if not on duty, during these hours to ensure timely attendance of injured Buru.

[During Budget Estimates 2025-26](#), it was stated that Urban Wildlife Officers have the day off on Christmas Day. If this is still the case, it should be changed because according to the wildlife call out data, there are callouts on Christmas Day and if there is no one on call, these animals are left to suffer until the following day if they don't die beforehand which is unacceptable.

Timely attendance of Urban Wildlife Officers

When it comes to timely attendance of injured Buru, we have concerns about how the performance indicator relating to 'injured, sick or accidentally confined/trapped Buru are attended to in a timely manner' will be measured. Minister Tara Cheyne was asked in a question on notice:

Is the time between the initial call out and attendance of an Urban Wildlife Officer to the injured or dead animal recorded; if so, what is the average wait time; if not, why not.

The answer received was:

No, primarily because the Wildlife Rangers primarily work alone and have a high operational workload after receiving a call out.

Noting this - how then will this performance indicator be measured if this isn't being recorded due to the rangers "high operational workload"? This must be addressed so that the performance indicator can be properly assessed.

And indeed, it is the high operational workload that we are concerned about - we are concerned that this high operational workload is preventing them from attending to injured Buru in a timely manner. Hence the importance of tracking the time between the call being received and the rangers attending.

Additionally, in the same answer to the questions on notice, Minister Cheyne has said that there are no plans to expand the Urban Wildlife Officer team. If there are no plans to expand the Urban Wildlife Officer team, it is not clear how, then, the time it takes to attend injured Buru will improve.

Noting this — permission to euthanise injured Buru should be expanded to licensed wildlife carers. Other states and territories allow for the euthanasia of injured wildlife by wildlife carers who have firearms licences and this results in a shorter time frame that injured wildlife have to wait to have their suffering ended. Implementing this in the ACT would aid in reducing the wait times for injured Buru, which in turn leads to less suffering and reduces the workload for Urban Wildlife Officers.

Community awareness of who to call for injured Buru

Another issue of concern is the community's lack of awareness of who they need to call for injured wildlife. While in recent times it seems this is slightly improving, there are still a number of posts to social media from people who have come across injured Buru and are not aware of who they should call or in fact have the incorrect information on who to call.

A lot of Canberrans appear to think that it is WIRES that they should ring, not realising that ACT is not covered by WIRES. Additionally, while there are those who know WIRES does not service the ACT region, these people suggest that others call ACT Wildlife, who of course do not have involvement with the rescuing, rehabilitating, or euthanasia of Buru due to the extraordinary restrictions on carers in the ACT.

More community awareness needs to be conducted to make it clear that it is Access Canberra that must be called for injured Buru.

Darting licenses for Urban Wildlife Officers

SCK notes that very few people have a license to be able to dart Buru in the ACT. Most, if not all Urban Wildlife Officers would only be carrying a firearm with them when attending call outs for Buru. This raises questions for how Urban Wildlife Officers can address call outs for trapped, but not injured, Buru. In other states and territories, when there are trapped Buru or Buru found in places where they are not usually found and is unsafe for them, they can be darted and relocated back to safety. For example, Vets for Compassion successfully darts and relocates Buru in Victoria on a regular basis. [Linked here](#) is a successful story about a Buru who was found in Fitzroy and needed to be darted and relocated back to outside of the city by Vets for Compassion in collaboration with Victoria Police. It is not clear why this same arrangement can not be implemented here in Canberra for Buru who find themselves trapped or not where they are supposed to be.

Barbed wire in urban settings

Information on the rate at which Buru are caught in barbed wire fencing across the ACT is not currently published anywhere. However, based on anecdotal information that SCK has received, we know that this does occur, and could be occurring regularly with Urban Wildlife Officers attending to call outs for Buru trapped in barbed wire fencing. Just recently, SCK was told that Buru were regularly being chased by dogs into barbed wire fencing on rural properties near Kambah and that Urban Wildlife Officers were regularly called out to euthanise the Buru. While we cannot say for certain how many Buru are being caught in barbed wire fences across the ACT, it is clearly a problem and should be addressed and reported on. Further discussion on barbed wire fencing is included later on in this submission.

Recording of reason and action undertaken for attendance of an Urban Wildlife Officer

SCK notes that one of the performance indicators for Interim Outcome C is that the reason for attendance and action undertaken is to be recorded by the Urban Wildlife Officer. SCK recommends that this information is published on the 'Living with Kangaroos' webpage at regular intervals for the public's awareness.

Recommendations:

- 1. The Urban Wildlife Officer team must be expanded to ensure that an absolute minimum of two rangers are on-call, one for northside and one for southside, outside of business hours. Consideration must be given to having Urban Wildlife Officers on duty during the peak crash time of 5.00pm to 10.00pm.**

2. Euthanasia allowance must be expanded to licensed wildlife carers, as is done in other states and territories, to ensure that injured Buru are tended to in a timely manner and their suffering is not prolonged.
3. A method of tracking must be developed for the time between the call and the time it takes for a ranger to attend an injured Buru so that the performance indicator can be accurately measured
4. It must be ensured that, at the very least, one Urban Wildlife Officer is on duty on Christmas Day.
5. Awareness campaigns must be conducted for the community on who they need to call for injured Buru. This could include road signs, letterboxed information and providing stickers for people's cars that they can have on hand with the relevant information.
6. Darting licenses must be expanded to ACT Wildlife carers and/or all Urban Wildlife Officers.
7. The reason for and action undertaken by the attending Urban Wildlife Officer (that has already been recorded in internal systems) must be published at regular intervals on the 'Living with Kangaroos' webpage.

Vehicle collision mitigation measures

Roads	ACT Government	N/A	<p>Vehicle strike is a significant cause of mortality in Buru in the ACT. These accidents can cause injury or death to the Buru and the vehicle occupants, and damage to vehicles. The ACT Government does not cull to address vehicle-Buru collisions. Wildlife collision mitigation measures are considered in the design of new or upgraded major roads, with fencing and underpasses currently present on some roads. The ACT Government undertakes euthanasia of Buru injured in vehicle collisions and removal of carcasses that pose a safety risk. Outcomes and activities related to reducing the incidence of Buru-vehicle collisions are presented in Section 4.3.4.</p> <p>Policies:</p> <p><i>Inclusion of road attributes that reduce the incidence of vehicle-Buru collisions will be considered in the design of new or upgraded major urban arterial roads in the ACT and will be subject to cost-benefit analysis. The main attributes to be considered currently are fencing and underpasses.</i></p> <p><i>Studies will be encouraged that: a) improve understanding of Buru behaviour in relation to roads and collision mitigation measures; b) assess the effectiveness of collision mitigation measures aimed at reducing the incidence of vehicle-Buru collisions.</i></p> <p><i>Driver awareness programs will be undertaken as needed to encourage slower speeds and extra alertness in 'black-spot' areas for vehicle-Buru collisions. Partnerships will be sought with interested organisations for such campaigns.</i></p>
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SCK is generally supportive of this section of the plan. So far not enough has been done to address ever increasing wildlife collisions on our roads which leads to the suffering of Buru and dangers to drivers. In terms of attributes to be considered - metal fencing should only be considered as a last resort where other options are not feasible. Where possible, the wildlife collision mitigation measures should still allow Buru to be able to cross the road so that they are not trapped on one side.

SCK supports more studies being completed to better understand Buru behaviour in relation to roads and collision mitigation measures and to assess the effectiveness of collision mitigation measures.

In terms of the driver awareness programs, SCK strongly recommends that the government seek partnerships with groups such as ACT Wildlife and SCK for these campaigns. Both these groups have a strong interest in seeing the reduction of wildlife collisions on our roads and have good reach within the community to ensure strong engagement with the driver awareness programs. SCK also recommends that the Directorate work with Access Canberra on incorporating wildlife awareness courses into learner driver training to ensure all drivers are aware of the high-risk times, who to call if they have a collision with wildlife, and how to be safe on our roads around wildlife.

Outcome 7 – The incidence of vehicle-Buru collisions is reduced in the ACT	
Interim Outcome P – The factors influencing the occurrence and distribution of Buru vehicle collisions are understood	
Activity	Performance indicator
P.1 Record and share data on the number and distribution of Buru vehicle strikes in the ACT	Spatial data collected by Urban Wildlife Rangers for all injured or dead Buru attended. Publicly available dataset is updated every 3 months.
P.2 Continue to support research the spatiotemporal patterns of Buru vehicle collisions.	Research supported and results published.

SCK strongly supports Interim Outcome P. At the time of writing, the data on wildlife collisions on the ACT Open Access Data Portal has still not been updated since March 2025. SCK believes it is important for the data on Buru vehicle strikes should be regularly updated and available to the public. However, it is important to note that the data that is collected and held does not provide an accurate picture of the scale of Buru vehicle strikes, given it relies on call out data only. SCK believes that the scale of Buru vehicle strikes is significantly under-reported and we are currently not getting the full picture of this problem.

Recently, the Victorian Legislative Council Economy and Infrastructure Committee tabled its [report](#) into the inquiry into Wildlife Roadstrike in Victoria and made a number of recommendations that could be implemented here. One recommendation that is highly relevant and applicable to Interim Outcome P is:

That the Victorian Government consider the establishment of a centralised, publicly accessible wildlife roadstrike data collection system database, in conjunction with and for adoption by all. This system should integrate data from wildlife rescuer groups, insurance claims, council reports, police data and individual wildlife rescuer call-outs, ensuring data method consistency and transparency, and 'single point of truth' data curation.

SCK strongly recommends that the ACT Government take note of this recommendation and consider applying it here in the ACT.

Interim Outcome Q – Collision mitigation measures that may be applicable to ACT roads are identified and trialled	
Activity	Performance indicator
Q.1 Consider inclusion of collision mitigation measures such as fencing and underpasses during the design of new and upgraded major roads in the ACT.	Number of new or upgraded roads that include wildlife collision mitigation features.
Q.2 Engage a consultant to undertake a literature review to identify existing and emerging Buru collision mitigation measures and their applicability to ACT roads, host a workshop with stakeholders to discuss potential approaches and identify key knowledge gaps and develop a final report that details a strategic short- and long-term approach to trialling and implementing Buru collision mitigation measures in the ACT.	<p>Consultant engaged by May 2026.</p> <p>Workshop held by July 2026 and attended by road safety staff, researchers, animal welfare groups, medical practitioners and other key stakeholders.</p> <p>Report completed by September 2026.</p>
Q.3 Seek funding to commence the approach developed under Q.2, including commencing research/adaptive management trials of collision mitigation measures.	<p>Funding sought for 2027/2028 financial year.</p> <p>If funding secured, trials commence in late 2027.</p>

SCK is generally supportive of Interim Outcome Q, particularly the proposed workshop to be held by July 2026 to discuss potential approaches to reducing wildlife collisions on our

roads. Wildlife road strike is a crisis in Australia with 10 million animals killed on our roads every year, which equates to 19 animals killed every minute. This is a tragedy for conservation, the welfare of animals and for the everyday Australians who drive on our roads. Action is urgently needed to address this crisis and the ACT should become a leader in developing and implementing effective wildlife collision mitigation measures to reduce the rate of collisions with wildlife on our roads. Rather than simply responding to wildlife injuries after they occur, the focus must shift toward proactive strategies that stop collisions from happening in the first place. This means embedding wildlife protection into every stage of road design, planning, public education, and legislative reform. The intent of Interim Outcome Q appears to be a step in the right direction.

The Draft Plan states that:

The ACT Government has drafted a signage policy which guides the use of warning signs for wildlife including static and seasonal electronic signs.

SCK is very interested in reviewing this policy. Previous requests for increased wildlife road signage have been denied, with claims that they are ineffective. SCK tends to agree that certainly the majority of static wildlife road signage has not made a difference for reducing wildlife collisions. However, we would be interested in reading the new signage policy and what has been recommended for implementation.

We note that Sarah Legge suggested far more than just warning signs in the short-term. While the ACT trial and research longer term solutions, she noted that:

in the meantime, the available data show where the hotspots for collisions are, and the EPSD Directorate could work with the Transport Canberra and City Services Directorate to consider the potential value of mitigation strategies that could be put in place immediately (e.g., reducing speed limits at collision hotspots with signs, speed bumps and speed cameras, especially during seasons and at times when kangaroos are more active).

Recommendations:

- 1. ACT Wildlife and Save Canberra's Kangaroos should be invited to collaborate on the driver awareness campaigns.**
- 2. The Directorate should collaborate with Access Canberra on incorporating wildlife awareness courses in learner driver training.**
- 3. Wildlife collision mitigation measures must be explored and implemented as a matter of urgency on all hotspot roads in Canberra.**
- 4. Inclusion of collision mitigation methods must not just be *considered* during the design of new and upgraded major roads in the ACT, it must be *required*. There must also be a long-term plan put in place to retrofit collision mitigation methods to existing road infrastructure.**
- 5. The following groups must be invited to the stakeholder workshop on collision mitigation measures: ACT Wildlife, Save Canberra's Kangaroos, Animal Liberation, the Animal Protectors Alliance.**
- 6. The ACT Government must consider the establishment of a centralised, publicly accessible wildlife roadstrike data collection system database, in**

conjunction with and for adoption by all. This system should integrate data from wildlife rescuer groups, insurance claims, council reports, police data and individual wildlife rescuer call-outs, ensuring data method consistency and transparency, and 'single point of truth' data curation.

7. The draft signage policy must be released publicly as soon as possible.

Other

The use of Ngunnawal language

The Draft Plan contains zero mentions of the Ngambri people who also have claims over the ACT.

Paul Girrawah House, a Ngambri-Kamberri custodian and party leader of the First Nations Party, included ending the kangaroo cull in his party's election policy platform for the 2024 ACT election. It is very curious that the views of the Ngambri people have not been included anywhere in the Draft Plan.

It is also important to note that it is not clear whether Professor Legge consulted with Ngambri people during her consultation period for her independent review. It is unclear whether Ngambri people were consulted in the drafting of this Draft Plan.

Use of night-vision in shooter tests

Sarah Legge recommended in her review:

Include the use of night-vision equipment in shooter tests.

The response in the Draft Plan to this recommendation is:

Shooter testing is currently undertaken during the day and night vision equipment is not used by all shooters so will not be incorporated into the testing at this time.

Given how different shooting is during the day versus at night with night vision equipment, it seems highly unreasonable to not make sure that shooters are competent at shooting with this equipment to ensure the accurate shooting of kangaroos to ensure the quickest death possible.

Therefore, in line with Sarah Legge's recommendation, we recommend the following.

Recommendation:

- 1. The use of night-vision equipment must be included in shooter tests for shooter who will be shooting Buru using this equipment.**

Barbed wire

Barbed wire is incredibly dangerous to Buru, and incidents of them being caught in them and dying slow deaths are common.

Yet, for some reason, barbed wire is common throughout most of the reserves in the ACT.

Recommendation:

- 1. The installation of new barbed wire in the ACT must be prohibited and all barbed wire removed from in and around reserves.**
- 2. The practice of grazing of cattle and sheep in ACT nature reserves must end immediately, given the degradation that these animals cause to the soil and grass of these reserves.**

Appendix

 **Canberra Notice Board Group** ...
All-star contributor Sophie Nesci · 18 May 2024 · 

Just passed dead Kangaroo 🥺 on Limestone Av near the War Museum. Could not stop as driving. Will call WIRES, but please check in if you can or I will on the way back.

   21 8 comments

 **Canberra Notice Board Group** ...
Rising contributor Sussan Curtis · 23 Jan 2022 · 

This morning in Drakeford drive I hit a kangaroo 🦘 I obviously stopped to try and get it off the road as it was still alive. It was very upsetting just hitting it but also for the few cars that slowed down to abuse me and tell in me no uncertain terms to get off the road you are insensitive morons.

 **Canberra Notice Board Group** ...
All-star contributor Libby Oakes-Ash · 28 Nov 2023 · 

Drivers slow down pkease. Someone hit a Kangaroo heading towards the Interchange from the city and left it there!! Mysekf and two other ladies stopped and managed to pull it off the road and stay with it until he passed away. Such cruelty to just leave the poor little thing to be squashed by the next four wheel drive. Just slow down and be a little kinder 😞

 **Canberra Notice Board Group** ...
Jessie Marshall · 14 Feb · 

Does anyone know if there's an out of hours wildlife care service? There's an injured kangaroo with a broken leg on Ginninderra drive near Kingsford smith intersection. It's standing on the side of the road but its leg isn't looking good. I tried calling ACT wildlife but just got put through to Access Canberra to make a report.

   73 105 comments 1 share

 Like  Comment  Send  Share



Canberra Notice Board Group



Karen Martin · 3 Apr 2019 · 🌐

So tonight I saw a female kangaroo hit by a car. The accident could not have been prevented as she came out from trees. I stopped to check the driver was okay and how the kangaroo was. She was badly injured and died not long after the impact. I asked the driver to call for wild life help and after checking that she was no longer moving / breathing we checked for a joey. There was a joey and after a few suggestions from the wild life helper, we picked up the mother, loaded her into his vehicle and he took them both to the emergency vet at Fyswick. I called to check if the joey could be saved but sadly it had also been injured 😞



Canberra Notice Board Group



Jessica Tam · 27 May 2021 · 🌐

This morning at 7am someone hit a kangaroo in Fadden and took a moment to slow down but didn't stop. The kangaroo was injured and couldn't get up and not long after, a tiny joey crawled out of her pouch. They were both extremely distressed. We tried to keep them calm until the rangers got there but the man said he couldn't save the mother and because the joey was so young and unfurred, he had to euthanize it as well. I tried to convince him to let me take it so I could try and find a carer but he said it was illegal - I didn't know this. If you hit something, at least have the decency to stop and call Access Canberra.

rspca-act.org.au

Wildlife First Aid | RSPCA ACT



Canberra Notice Board Group



Rising contributor Anna Dixie · 15 Oct 2023 · 🌐

Who can I call for an injured female kangaroo that isn't going to just kill it?
Any wildlife rescues that can help with kangaroo's?



Canberra Notice Board Group



Top contributor Sophie Wright · 23 Oct 2023 · 🌐

When you find a mumma kangaroo that has been hit by a car what do you do ? You catch it and take it to the RSPCA. Thankyou to the 3 men that stopped and helped. Please keep mumma and pinky in your hearts 🙏💜😞 was found on Hindmarsh drive just before Larakia st turn off



Canberra Notice Board Group



All-star contributor Tegan Martin · 30 Nov 2024 · 🌐

Hi all,

A heads up to anyone who is planning to drive along Long Gully Rd tonight. There is a kangaroo that is very much still mobile and attempting to hop around that has clearly been hit by a car. It was in the middle of the road when I drove up to it (I did not hit it) and would not move for anything. While it's just off the road now (just at the form one lane) it keeps going back out. The ranger is on the way (apparently, and I'm here waiting for them in case the roo goes back out). Please drive with caution, remembering it is raining.



Canberra Notice Board Group



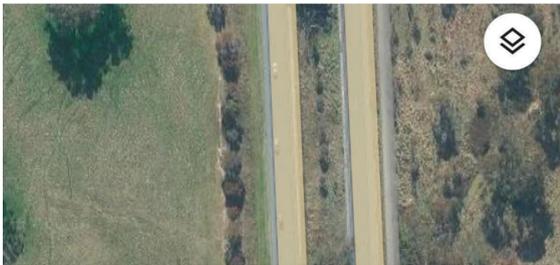
Natalie Zul · 3d · 🌐

Update: a member of the community has commented that a ranger has now attended. Commenting has been turned off. Thanks everyone for your help in getting this poor animal some relief.

I know this is a long shot but if there are any authorised ethical shooters out there, there is a kangaroo with a catastrophic leg injury but very much alive on the side of the road on the Majura Parkway. I've reported to access Canberra but I waited with the animal for 2 hours before I had to leave, and still no sign of a ranger. I've also tried calling ACT policing via 131444 multiple times and can't get through.

When I came upon this roo this morning, it was clear it had been there for quite some time and must be in tremendous pain.

The thought of this animal suffering any longer and especially in today's forecast heat, is extremely distressing. If there's anyone who can assist in putting the poor thing out of its misery, location is marked below.





Canberra Notice Board Group

Callie Stone · 8 May · 🌐



THANK YOU TO EVERYONE FOR YOUR SUPPORT -
The female Roo has been attended to- the power of a
community! 💕💕 ##

Looking for some help if anyone knows the owners of this
property highlighted in red - off Majura highway and
shares a fence with Majura MTB Pine Trails.

There is a significantly injured Kangaroo that has been
there for a few days, very much alive just dragging itself
around with a broken leg.

I often ride and hike along the trails and have noticed it
over the last few days.

Attempted to called ACT Wildlife - ACT Access and nothing
has been done yet. I do acknowledge it is on private
property hence my plea to see if the owners could offer
help it or access to it (give it a soft landing)





Canberra Notice Board Group



Kate Howso · 18 Aug · 🌐

Injured Kangaroo

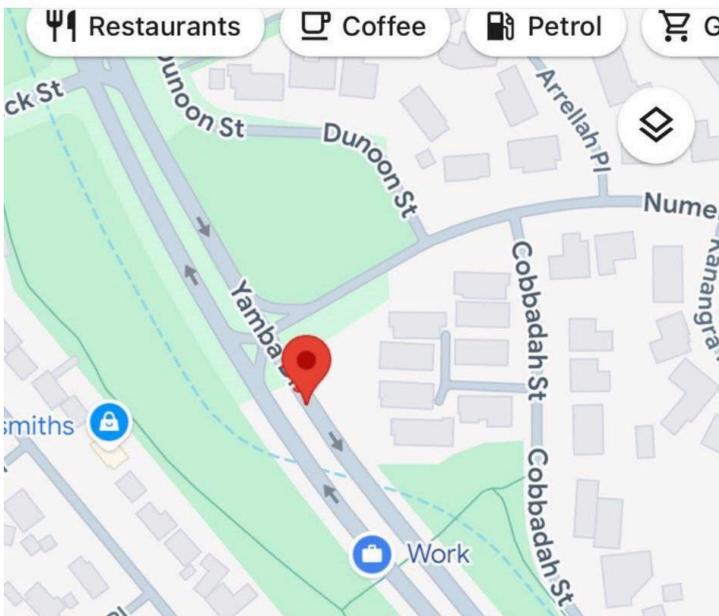
Have called the ranger
They are an hour away

It's aggressive and moving

Cannot help it

Had to get to work
Sorry i couldn't stay with it and my presence seemed to
aggravate it

Thank you to all the kind strangers to stopped to offer
assistance on their morning commute





Canberra Notice Board Group



Abby Taylor Pratt · Top contributor

Please, it's stuck in the rain hit her. I can't move him by myself Can anyone please come and help me? This is Roy Marika Street in Bonner. I need somebody



Mate.



👍 383 💬 ➦ 6



Canberra Notice Board Group



Top contributor Tash Aileen · 16 Feb · 🌐

I have been waiting for 2 hours for help for an injured kangaroo! Just off Gungahlin Drive! This is inhumane and disgusting, this animal is in agony! The system is totally backwards!

ACT Wildlife contact, said its Access Canberras problem. Police no help.