Consultancy Services

Report into the feasibility of re-introducing skin-only shooting in NSW – ADDENDUM

Report Number 21147. ADDENDUM

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Prepared for

Department of Environment and Conservation

P.O. Box 2111
Dubbo NSW 2350
Telephone: 02 6883 5322

by

by

EASySTEMS
ENVIRONMENTAL & AGRICULTURAL SCIENCE & ENGINEERING

PO Box 1251
ARMIDALE NSW 2350
Telephone: (02) 6771 4864
Facsimile: (02) 6771 4867
ABN: 67 081 536 281
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<td>Sally Egan</td>
<td>Martin Dillon</td>
<td>Sally Egan</td>
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<td></td>
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<td>Steffan Holmes</td>
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Signature

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This document provides information to address the intent of Project Number 21147 as agreed to by Department of Environment and Conservation.

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Introduction

A report into the feasibility of re-introducing skin-only shooting in NSW was prepared by E.A. Systems Pty Ltd and submitted to the NSW Kangaroo Management Advisory Panel on 16/12/2005. A presentation regarding the findings of the report was made to the Panel by Ms Sally Egan on 02/03/2006. As a result of the presentation and some points of contention within the findings of the report, the Panel requested a final round of consultation. DEC suggested they submit their concerns in writing and that an opportunity would be provided for Sally Egan from E.A. Systems to have the right of reply.

This report acts as an addendum to the first report (22247.6087) and should be read after reading the original report and the submissions (Appendix A). It outlines the content of the submissions made by the groups who have representation on the Panel, and also includes discussions by Sally Egan addressing the submissions and any subsequent changes to the recommendations resulting from the submissions.

For ease of reading, the report has been structured into a list of themes presented by those submissions that can be considered to be ‘for’ the reintroduction of skin-only shooting and another list for those that are ‘against’. The actual submissions received by DEC are provided in Attachment A. Please note that the responses to the submissions are not referenced although the list of references used is supplied in the document. The decision not to reference was made as no new information has been supplied, rather information originally presented in the full feasibility study has been reiterated. If the reader wishes to follow up a line of argument presented here, it will either be referenced in the original feasibility document, or it is the opinion of the authors.

The ‘fors’.

Submissions that maintain or express a new support for the re-introduction of skin-only harvest into NSW were received from:
- The New South Wales Farmers Association (NSW FA);
- The State Council of the Rural Land Protection Board (RLPB); and
- The Pastoralist Association of the West Darling (PAWD).

Issues submitted by these groups can be loosely clumped into themes and these are presented in Table 1 below.

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<th>Number</th>
<th>Theme</th>
<th>Organisation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Carcass industry has not taken full quota historically, reintroduction will move industry closer to full utilisation of the quota.</td>
<td>RLPB, PAWD, NSW FA</td>
</tr>
<tr>
<td>2</td>
<td>Shooters have to take more carcass to achieve an economical weight when condition of animals is poor; skin only harvest would provide opportunity when climatic conditions mean carcass condition is too poor for meat harvest</td>
<td>RLPB, PAWD, NSW FA</td>
</tr>
<tr>
<td>3</td>
<td>Kangaroos should be harvested to their full potential including meat and skin</td>
<td>RLPB</td>
</tr>
<tr>
<td>4</td>
<td>Skin only harvest would provide protection for landholders also trying to recover when seasonal conditions improve</td>
<td>RLPB, PAWD, NSW FA</td>
</tr>
<tr>
<td>5</td>
<td>Kangaroos as pests, skin-only harvesting would allow landholders to recoup costs.</td>
<td>RLPB</td>
</tr>
<tr>
<td>6</td>
<td>Concerns over pest animal access to carcasses can be addressed by management of the carcass</td>
<td>RLPB, PAWD, NSW FA</td>
</tr>
<tr>
<td>7</td>
<td>Skin-only shooting will allow shooting to continue where carcass take is limited or where it is difficult to take the required numbers of carcasses because of inaccessibility</td>
<td>RLPB</td>
</tr>
</tbody>
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8 The issue of skin-only harvest should remain open for discussion in future review processes despite the recommendation of the report. RLPB

9 Landholders do not receive income from kangaroo harvest on their land and skin-only harvest may be one way this can occur. The industry is well provided for by landholders; it is the infrastructure and maintenance of watering points by landholders that support the kangaroo population and consequently the industry, it is only fair that landholder be given reasonable opportunity to access economic return from the industry they provide for. RLPB

10 Skin-only harvest may assist in reducing total grazing pressure. RLPB, PAWD, NSW FA

11 Skin-only harvest is a better option than large numbers of animals dying in the field during drought situations. PAWD, NSW FA

12 Should reintroduction occur, tags would be available to trappers and landholders. PAWD, NSW FA

13 Should reintroduction occur, the skin-only allocation within the quota should match the average difference between quota and take for the previous 5 years. This could be monitored quarterly and adjusted as market forces and quota utilisation require. PAWD, NSW FA

14 It is difficult to ascertain that a less professional attitude will prevail in skin only harvesting; Trappers who carry out skin-only harvesting could be required to complete current Game Meat Handling courses and undergo Firearms competency and Accuracy tests; checks and measures in place within the industry should be effective in ensuring the industries high standards are maintained; compliance can be sought from Fauna Dealers to ensure illegal sale and trade in skins doesn’t occur. PAWD, NSW FA

15 The issue that skin shooting has the potential to destabilise the industry is difficult to substantiate, there is no basis for arguing that the re-introduction of skin only harvesting would have an adverse impact on the market or industry. PAWD, NSW FA

16 In relation to issues of poor quality skins, a code of practice for preparation and storage could be prepared. PAWD, NSW FA

17 The issue of smaller animals being taken is easily overcome by the establishment of a minimum accepted skin size. PAWD, NSW FA

18 The remoteness of western NSW is an issue PAWD, NSW FA, KIAA

19 The placement of chillers is an issue. PAWD, NSW FA

20 The high cost of transport is an issue, skin only shooting will help to reduce transport costs and improve quota utilisation in isolated zones. PAWD, NSW FA

21 High establishment costs of trays, chillers, and fuel are a major barrier for landholders accessing the industry. PAWD, NSW FA

The ‘againsts’

Submissions that maintain or express a new support for not re-introducing a skin-only harvest into NSW were received from:

- The New South Wales Division of the Australian Veterinary Association (NSW AVA);
- The Australian Game Meat Producers Association (AGMPA);
- The Kangaroo Industries Association of Australia Inc. (KIAA); and
- The NSW Department of Primary Industries (DPI).

Issues submitted by these groups can also be loosely clumped into themes and these are presented in Table 2 below.

<table>
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<tr>
<th>Number</th>
<th>Theme</th>
<th>Organisation</th>
</tr>
</thead>
<tbody>
<tr>
<td>22</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Ethically the carcass should be used whenever it is feasible. Industry should be moving away from shooting to waste.</td>
<td>NSW AVA, KIAA</td>
</tr>
<tr>
<td>---</td>
<td>-------------------------------------------------------------------------------------------------</td>
<td>----------------</td>
</tr>
<tr>
<td>22</td>
<td>There are insufficient kangaroos available in NSW at present to sustain the needs of the carcass industry and this may not change for some years to come.</td>
<td>AGMPA</td>
</tr>
<tr>
<td>23</td>
<td>DEC must maintain flexibility in management according to the conditions at the time. If in future years, if markets provided under full utilisation scenarios can not control numbers and assuming welfare consideration can be addressed, the inherent flexibility of the management guidelines should be maintained as to allow skin-only shooting.</td>
<td>AGMPA</td>
</tr>
<tr>
<td>24</td>
<td>There is no conservation benefit to kangaroo populations in allowing the reintroduction of skin-only harvesting</td>
<td>KIAA</td>
</tr>
<tr>
<td>6</td>
<td>The increase in feral animal numbers which would feed on discarded carcasses whether buried, burnt or otherwise would be detrimental to other native species.</td>
<td>KIAA</td>
</tr>
<tr>
<td>25</td>
<td>KIAA refutes arguments that there are areas of Western NSW that are poorly serviced by the carcass industry.</td>
<td>KIAA</td>
</tr>
<tr>
<td>26</td>
<td>A re-introduction of skin-only harvesting would cause continued investment of infrastructure by carcass processors to be questioned as short term speculative skin only operations become possible. This could result in less quota utilisation than is presently the case.</td>
<td>KIAA</td>
</tr>
<tr>
<td>21</td>
<td>Arguments regarding the prohibitive costs of entering the carcass shooting industry for landholders are a wild exaggeration.</td>
<td>KIAA</td>
</tr>
<tr>
<td>8</td>
<td>KIAA does not agree with the recommendation in the initial report that the proposal should not be considered ever again.</td>
<td>KIAA</td>
</tr>
<tr>
<td>27</td>
<td>It is important that the kangaroo industry remains strong and does not open itself up to destabilisation and further criticism. A risk is that the re-introduction of skin-only shooting would detract from the image of the industry.</td>
<td>DPI</td>
</tr>
<tr>
<td>28</td>
<td>Skin-only harvests would increase the level of compliance necessary and reduce the current level of control over animal welfare.</td>
<td>DPI</td>
</tr>
<tr>
<td>29</td>
<td>Skin-only shooting benefits few people (landholders) and these landholders can with some investment participate in carcass harvest. The report demonstrates that the skin industry prefers to obtain skins from carcass processors and that overall, benefits to landholders would be small and not worth the damage to industry that might occur from opponents emphasising the negative aspects.</td>
<td>DPI</td>
</tr>
<tr>
<td>30</td>
<td>The report identifies the declining role of skin-only shooting in Queensland where skin only shooting has decreased to low levels in comparison to carcass shooting.</td>
<td>DPI</td>
</tr>
<tr>
<td>1</td>
<td>In NSW there is a high utilisation rate of the kangaroo quota without skin-only shooting.</td>
<td>DPI</td>
</tr>
<tr>
<td>31</td>
<td>The current Kangaroo Management Program offers opportunity to minimise kangaroo damage to crops and pastures while maintaining the best opportunities for the long term future for the kangaroo industry.</td>
<td>DPI</td>
</tr>
</tbody>
</table>

**Discussion**

**Issue 1. Quota utilisation**

The RLPB, PAWD and NSW FA all submitted that the level of quota utilisation in NSW has been historically unacceptable and proposed that allowing skin-only harvest would improve the levels of quota utilisation experienced across the State.
NSW DPI conversely, agreed with the original feasibility report’s assessment that the levels of quota utilisation in NSW are comparatively high.

E.A. Systems reiterates the position it took in the initial report as NSW quota utilisation rates are comparatively high when compared to those occurring in the same period in Queensland. We direct attention to the graph on page 24 of the feasibility assessment (Figure 25) which clearly shows the higher percentage taken in NSW. On average 20% more of the NSW quota was taken from 1997 to 2002, than over the same period in QLD.

The second part of this issue concerns the potential to improve the rate of quota utilisation in NSW with the introduction of skin-only harvest.

We would like to repeat our previously stated judgement that the rate of quota utilisation will not improve following the reintroduction of skin-only harvests unless there is an established and stable market for the resulting skins. This is not the case as the market for skins direct from the harvester is now below 10% in Queensland and processors from both Queensland and NSW have stated clearly that they prefer to source skins from meat processors for both quality and ease of access reasons. So, there is no established market for the product. The second point we wish to make is that skin-only harvest can only improve quota utilisation in the long term if it remains stable. We believe this is not a likely or possible outcome of reintroducing skin-only into NSW as we established in the feasibility report that the skin-only harvest did not remain stable in Queensland, despite having a long history, a massive market share of product and established trade connections. We believe a new skin trade in NSW after years of no activity, will have no possibility at all of providing stability.

Issue 2. Declining carcass condition in times of drought

The RLPB, NSW FA and PAWD are concerned that trappers have to take more carcass to achieve an economical weight when the condition of animals is poor. They suggest that skin only harvest would provide opportunity when climatic conditions mean carcass harvesting is too poor for meat harvest.

We agree that skin-only harvest may provide an opportunity to continue to harvest kangaroos when carcass condition is insufficient to allow skin/carcass harvest. However as we have previously stated on page 32 of the feasibility report, as carcass declines, skin quality may also decline and there is a limited window between when an animal becomes unsuitable for carcass harvesting and an associated possible decline in skin quality which could result from physical trauma to the skin from changed behaviour, poor body condition and an increased susceptibility to parasites and disease. As animals start to die, it becomes increasingly uneconomical to shoot them for skin-only or carcass as there are not enough left in the landscape to justify the costs of attempting to harvest them.

The RLPB has suggested that currently shooters have to take more carcasses to achieve an economic weight. This is possible in the light of high fuel prices, however as a result of shortened supply and increasing demand, we find it difficult to understand why shooters would be unable to recoup costs of skin/carcass harvesting at present. Processors are desperate for supply and as such have been paying very high prices for some months now.

Issue 3. Full utilisation of the animal

The RLPB State Council submits that the kangaroo should be harvested to its full potential including meat and skin. Similarly the NSW AVA and DPI support full utilisation of the animal. We think the submissions are slightly different and that the RLPB State Council is supporting the notion that the full potential of harvest options should be supported in regard to kangaroos, rather than the animal is fully utilised. The only other interpretation of their submission would be that they were unaware that when the term ‘carcass harvest’ is used, it actually refers to the harvesting for the meat and the skin of the animal.

It is our view that the increase in the general public’s demands for ethical and environmentally sound management of most industries, let alone wildlife harvesting ones, will ensure that full utilisation of
the animal is provided for in the Kangaroo Industry. Whilst we have some empathy with RLPB’s submitted position it may not be reflected by the greater body of the community.

**Issue 4. Protection for landholders when trying to recover post drought**

The RLPB, NSW FA and PAWD have suggested that skin only harvest would provide protection for landholders also trying to recover when seasonal conditions improve.

This would only be the case under a particular set of circumstances including:

- Kangaroos are providing a threat to a landholders recovery post drought
- There are enough kangaroos in the landscape to make it feasible for a person to harvest for either skin/carcass or skin-only
- There is a market or economic driver for the take of skin-only
- If the opportunity for recovery for the landholder is related to money they may make, the landholder will have to harvest the kangaroos themselves.

It is our view that in most cases these conditions will not apply. Following significant periods of climatic stress, kangaroo numbers are likely to be at their very lowest and consequently will not provide a threat to landholders or landscapes recovering from drought. It is estimated by kangaroo ecologists that a period of at least 4 years is required for kangaroos to reach pre-drought levels (Cairns S. pers commun.). The low levels of animals in the landscape will mean that harvest effort for an economic return will increase as animals are further apart and harder to find. Therefore it might not be economically feasible for a harvest to operate in that area for either carcass/skin or skin-only purposes.

Most importantly, for anyone to invest time and energy into shooting kangaroos for skin-only purposes, there must be a market for the product. The QLD case study suggests that the remaining skin-only market may well be on the way out, with levels of harvest down to 8% of the total take. Skin processors have declared a clear preference for buying skins from carcass processors. Any opportunistic market that does grow up around a decision to re-introduce skin-only harvest is likely to be short-term and highly unstable.

**Issue 5. Kangaroos as pests**

The RLPB has submitted that kangaroos are pests and as such skin-only harvesting would allow landholders to recoup costs of necessary control.

We were pleased to see this point come out in the submissions as we suspect that this is the real reason that landholder orientated groups are calling for reintroducing skin-only harvest. However, this does not change our original view presented in the feasibility report for the following reasons:

- The State and Federal governments of Australia do not agree that kangaroos are pests, instead have declared them wildlife and therefore the property of the Crown. As such labelling kangaroos as pests and seeking recompense for their control is not relevant to discussions regarding the sustainable management of the commercial harvest.
- It is important for the defence of the commercial harvest, that the harvest is not supported on the grounds of pest management and that damage mitigation activities and commercial activities are not intermingled on any level. This is because damage mitigation activity is not managed rigorously enough for it be defended at the AAT. If damage mitigation and commercial activity are not kept clearly separated, there is a risk that the whole program will be overturned.

**Issue 6. Management of carcass waste**

The RLPB, NSW FA and PAWD believe that concerns over pest animal access to carcasses can be addressed by management of the carcass waste such as burying, burning or using carcasses as bait for feral animals. The KIAA has submitted that there is potential for negative impact on native species, despite the management activity used.
We stand by our original submission in the feasibility report that the empirical evidence that would prove that carcass waste has a positive impact on feral animal populations is not available. Furthermore, we find it hard to conceive of how potentially large numbers of carcasses every night, can be effectively managed from an economic point of view. If a skin-only harvester takes between 50-100 animals a night as used to be the case in Queensland, this represents far too much meat to be used in baiting programs. Burning and burying this number of animals will very quickly become an economic impost that will not be sustainable for either the landholder or the trapper. Lastly, Department of Environment and Conservation is advised that this type of condition on a licence is, in our view, largely unenforceable and the reality is that carcasses would remain in the landscape to potentially favour feral animal populations.

**Issue 7. Limited carcass take and inaccessibility**

The RLPB has submitted that skin-only shooting will allow shooting to continue where carcass take is limited or where it is difficult to take the required numbers of carcasses because of inaccessibility. This will in turn increase landholder or trapper viability.

We refer to the feasibility report page 32, where we have outlined the views of the kangaroo industry. They have claimed that they can get trappers to anywhere there is a problem with kangaroo numbers, negating the need for this option. We wondered what the RLPB was actually referring to when they are referring to carcass take being limited. Apart from quota, climatic conditions and market demand, there are no other limiting factors that we can record. If the limiting factor is quota, skin-only harvest will not provide an increase in landholder or trapper viability as skin-only harvest would also be limited. If the limiting factor is the climatic condition, then we refer the reader to Issue 1 above where we have discussed this point. If the issue relates to market demand, it is more likely that market demand will support skin/carcass harvest than skin-only harvest.

If kangaroos are inaccessible for skin/carcass harvest then presumably they would be inaccessible for skin-only harvest.

Finally, permitting skin-only shooting will not improve landholder or trapper viability if there is no market for the product being harvested.

**Issue 8. Review of the outcome of this debate**

Both the RLPB and KIAA have objected to the recommendation in the initial feasibility report that suggested that a decision should be made regarding the re-introduction of skin-only harvest and then the debate should be set aside. KIAA have requested that the statement be ‘watered down’.

E.A. Systems is an independent private company who was asked to look at a specific set of data, assess the feasibility of re-introducing the skin-only harvest and advise the NSW Kangaroo Management Advisory Panel of the result. Whilst the company is truly independent of government, it cannot claim impartiality as the principal investigator in this case has a long association with the Queensland Macropod Management Program at a senior level. It is this experience that supports the recommendation that a decision be made and then adhered to with no further discussion at least until there is some change in the status quo. Large amounts of public money, Panel member time and government resources have been expended on this issue to no effect. The reality is that the argument comes down to landholders and their associated organisations wanting less kangaroos in the landscape and seeing the re-introduction of skin-only harvest as a way of achieving this end, a wholly understandable position from their view point. The opposing side of the argument is supported by industry and ethical considerations of full utilisation of the animal and rational economic analysis that predicts that skin-only harvest will not solve the problem. As such, it is our belief that consensus on this issue will not be reached unless there is some significant change in the current political, economical, social or cultural factors surrounding the commercial harvest of kangaroos in NSW and therefore we recommend strongly that no further resources are spent endlessly rehashing the same points of view. As such we stand by our original recommendation and refuse to water it down.
**Issue 9. Income for landholders and issues of ‘fairness’**

RLPB, NSW FA and PAWD all seem to agree that landholders do not receive income from kangaroo harvests on their land and skin-only harvest may be one way this can occur. PAWD suggests that the kangaroo industry is well provided for by landholders. They believe that it is the infrastructure and maintenance of watering points by landholders that support the kangaroo populations and consequently the industry and it is only fair that landholder be given reasonable opportunity to access economic return from the industry they provide for.

We agree that it is the infrastructure and improved nutritional availability in the landscape provided by landholders maintained watering points, pastures and crops that provides for the overabundant kangaroo populations in Australia today. The argument of whether that entitles landholders to the ‘right’ of a return on the subsequent populations is a long and involved one ranging across ethical, social, cultural and legal frameworks and cannot be discussed in full in this document. Our personal opinion is that landholders do not have this ‘right’ at present and that is based on the purely legal interpretation of state level wildlife legislation that suggests that kangaroos belong to the state. We must also remain mindful that some of these same activities by landholders have also cost the public purse in terms of water and land degradation and losses in biodiversity. Landholders do not currently have to pay these costs unassisted by government and the community at large.

Furthermore, there are other ways that landholders can access an economic return from the industry. Landholders have just as much opportunity as any other person to access economic return from the industry at the moment, without skin-only harvest. A landholder can become a trapper and harvest kangaroos from his own property and other properties. A landholder can if they so desire invest in the industry in other ways, including buying shares in those companies within the industry that have become public. Landholders can, with the support of the fauna dealers, also become a buyer and supplier to processors. Lastly, there is nothing in law that says a landholder cannot charge a trapper for the right to access his property or enter into a deal with a fauna dealer to provide property access for their trappers.

Once again, we turn the reader’s attention to the point that introducing skin-only harvest is unlikely to provide opportunities for economic gain for landholders, because there is a small and diminishing market for skin-only products. Any market that does spring up if skin-only harvest is re-introduced is likely to be opportunistic, short-term and highly unstable as stable skin processing members of the kangaroo industry have a clearly stated preference for purchasing skins from carcass processors.

**Issue 10. Skin-only harvest may assist in reducing total grazing pressure**

RLPB, NSW FA and PAWD all suggest that skin-only harvest might be a method of reducing total grazing pressure whether overall or when landscapes are recovering from drought.

As we initially suggested in the feasibility study, skin-only harvest will not provide any significant relief from grazing pressure under normal circumstances. The harvest is only 15-17% of animals and is set at a level that will not impact considerably on kangaroo populations across NSW. As such, even with full utilisation of available quota, 83-85% of the population will remain in the landscape. This means that even with full utilisation of available quota, no significant reduction in grazing pressure at the landscape scale is possible through the entire commercial harvest, let alone the tiny proportion that is likely to be taken for skin only.

In regards to the suggestion that skin-only harvest will permit landholders to protect themselves from the high total grazing pressure presented by kangaroo populations post drought, we refer the reader to Issue 4 above.


**Issue 11. Animals dying in droughts**

PAWD and the NSW FA have suggested that skin-only harvest is a better option than large numbers of animals dying in the field during drought situations.

We disagree that large numbers of kangaroos dying in drought times is worse or preventable by skin-only harvesting. Climate is the primary limiting factor on kangaroo populations and as the harvest is only 15-17% of the population at best, there will always be large numbers of kangaroos dying when unfavourable climatic conditions occur. It should be noted that kangaroos have probably evolved several of their advantageous adaptations as a result of the boom/bust cycle that occurs in Australia naturally and there have probably always been large numbers of kangaroos dying when climatic conditions swing from favourable to bad. Skin-only harvest will provide an almost negligible relief to this problem as the numbers will be so small compared to the population. It is also possibly not feasible to take enough animals in the short period of time between when animals become unsuited for carcass harvest and they start to die, to make a significant difference.

**Issue 12. Tags for trappers and landholders**

This issue refers to a policy decision if skin-only harvest were introduced. PAWD and NSW FA have suggested that should reintroduction occur, tags should be available to trappers and landholders.

We agree that tags should be available to trappers, however for administrative and compliance reasons, the animals must be shot by licensed trappers. Therefore landholders would certainly be able to receive the tags, but to use them, they must first become licensed trappers.

**Issue 13. How much quota for skin**

This issue also refers to policy decisions if skin-only harvest were introduced. PAWD and NSW FA suggest that if reintroduction occurs, the skin-only allocation within the quota should match the average difference between the quota and harvest for the previous 5 years. This could be monitored quarterly and adjusted as market forces and quota utilisation require.

At first glance this appears a reasonable way of approaching the issue of if there is an allocation to skin-only harvest, what should that allocation consist of. However, if we use that model in the current situation it would leave the carcass industry with a greater lack of supply than that currently experienced and leave more animals in the field which is counter to the stated interests of landholders. This is because once the tags were allocated to skin-only, they would not be available to fix to a carcass, therefore that number of animals would become unavailable to the carcass industry despite market forces. Furthermore as there is no market for skin-only products at present, the skins would probably not be taken at all, leaving the animal in the field.

The suggestion that quarterly monitoring and adjustments should be carried out will address the issues of allocated but unused tags, however there will be an appreciable delay in making those animals initially allocated to skin-only harvest available for skin/carcass harvest.

**Issue 14. Professional attitudes**

PAWD and NSW FA have suggested that it is difficult to ascertain that a less professional attitude will prevail in skin only harvesting; Trappers who carry out skin-only harvesting could be required to complete current Game Meat Handling courses and undergo Firearms competency and Accuracy tests; checks and measures in place within the industry should be effective in ensuring the industries high standards are maintained; compliance can be sought from Fauna Dealers to ensure illegal sale and trade in skins doesn’t occur.

We agree that it is difficult to prove categorically that a less professional attitude will be displayed by skin-only harvesters in NSW. Historically in QLD there were harvesters who were skin-only specialists with high levels of professionalism who took great pride in doing things in a law abiding
and technically sound manner. Some of these people are still in the industry and still harvesting for skin-only, with skin processors treating them as the exception to their preference to buying from the carcass processing plant.

However, the flip-side of the QLD experience (nb: it is the principal author’s experience as Manager of the QLD program) is that providing a skin-only harvest attracts people into the industry in the hope of making a quick dollar, often as there is the mistaken belief that it is possible to make extra money shooting kangaroos without compromising unemployment benefits. This kind of licensee has no intention of following the rules once they are licenced and generally commit offences that include:

- Failure to supply returns
- Failure to complete returns accurately
- Failure to shoot humanely (ie butt-shooting as they are not accurate enough for head-shots)
- Unlicenced shooting (ie shooting on a property not listed on the licence – poaching)
- Selling untagged skins

Harvesters in QLD are required to complete Game Meat Handling courses, firearms competency and accuracy courses and a course showing them how to comply with EPA requirements. This seems to make little difference to the levels of compliance in some sectors of the licensee group. In particular skin-only provides an opportunity for people to enter the industry with very little capital expenditure, and as such, they have no investment either intellectually or financially in supporting the good of the industry as a whole.

The suggestion that industry, particularly dealers, can ensure high standards are maintained is true in so far as the dealer can control who they buy from and set the standard of what they will accept as suitable. However, there is no guarantee that skins will be sold in NSW, as one of the intrinsic problems with having a trade in skins is that they are highly mobile, not obvious and long-lasting without refrigeration. Queensland certainly employs dealer influence to achieve harvester compliance, however it has been found that untagged skins are still bought and sold in Queensland and interstate, in sometimes very large numbers. One of the reasons this occurs is because tanneries are not familiar with the rules of all states, and some tanneries are found in states that do not have a commercial harvest at all. Therefore they assume that the product they have received complies even though this may not be the case. This does not reflect a lack of will to support the kangaroo industry, but is simply a reflection of the distances and complexities of several states with different requirements and programs.

**Issue 15. Industry destabilisation**

PAWD and NSW FA believe that the issue that skin shooting has the potential to destabilise the industry is difficult to substantiate and there is no basis for arguing that the re-introduction of skin only harvesting would have an adverse impact on the market or industry.

We agree that it is difficult to substantiate that the re-introduction of skin-shooting will destabilise the industry. However we stand by our original statement that it certainly has the potential to do so. We are basing this judgement on the historical case study of the skin market in Queensland destabilising itself in the mid 1990’s to the eventual benefit of the skin/carcass industry. Also personal communication with established and wise leaders of the industry in Queensland revealed concerns that the same destabilisation would be experienced again in the near future. The reasons why skin-only harvest has the potential to destabilise the industry are: that it is subject to wild fluctuations in demand and supply; the market heats quickly and it is possible to shoot and sell large numbers relatively quickly; skins can be stored therefore processors can buy hard for short periods and then stop altogether; and finally, quality cannot be established until late in the tanning process. Therefore international markets spring up, demand is high, prices go up, animals are shot to the point of quotas closing, quotas are filled with skin-only animals, the product quality is indeterminate and the market can be lost on quality grounds and then the whole thing collapses again. In the mean time, skin/carcass markets are also shattered as the carcass processors have been unable to meet contracts due to a paucity of supply. It is this situation that leads to the massive under utilisation of quotas as
experienced in QLD in the late 1990’s and undoubtedly contributed to the highest ever recorded populations in the early 2000’s.

**Issue 16. Skin Quality**

PAWD and NSW FA have suggested that in relation to issues of poor quality skins, a code of practice for preparation and storage could be prepared.

We agree that a code of practice for preparation and storage could be prepared in an attempt to improve the quality of skins and prevent avoidable damage. It must be noted that skins that are salted have lower tear ratings than those that are frozen, even if the best job possible is done with them.

**Issue 17. Skin size**

PAWD and NSW FA have submitted that the issue of smaller animals being taken is easily overcome by the establishment of a minimum accepted skin size.

We agree with this submission and this is certainly what has been attempted in QLD. It should be noted that it is almost impossible to match skin size and carcass weight through the range of condition, age and species size variables among kangaroo populations and there are sometimes strange side effects of setting size or weights. For example, female wallaroos in QLD are rarely shot for skin/carcass as they do not make the weight required. They are sometimes shot as small skins however as they do meet the skin size requirements. It could be argued that the skin size is obviously too small and should be lifted, however species density interactions could be impacted on by this decision as the females of one species would be completely unharvested, possibly providing a competitive edge over red and grey kangaroos whose females are harvested. Already it is being suggested that the weight requirements for wallaroos needs to be dropped in QLD to allow harvesting of female wallaroos for skin/carcass products as the rate of skin-only harvest is now so low. Processors do not want this to happen however as they pay for the processing of the animal on a per head rather than a per kilo basis, therefore smaller animals are not economical to process.

**Issue 18. Remoteness**

PAWD and NSW FA have stated that the remoteness of western NSW is an issue.

As we are unclear on the specifics of what this submission was referring to we cannot respond. If the issue is regarding poor service by the industry because of the remoteness issue, we refer the reader to issue 25 below.

**Issue 19. Placement of chillers**

The placement of chillers is an issue according to PAWD and NSW FA.

As we are also unclear on the specifics of this issue, we do not feel able to respond.

**Issue 20. High cost of transport**

PAWD and NSW FA believe that the high cost of transport is an issue and skin only shooting will help to reduce transport costs and improve quota utilisation in isolated zones.

We agree that the high cost of transport is an issue in the kangaroo industry and likely to cause some rearrangement of pricing structures and operational arrangements after extended periods of high fuel prices. Whether skin only shooting would help reduce transport costs and improve quota utilisation in isolated regions would depend on the scope of the market (we think it would be disappointingly small) and the operational arrangements implemented.
**Issue 21. High costs of industry entry prohibitive**

PAWD and NSW FA believe that the high establishment costs of trays, chillers, and fuel are a major barrier for landholders accessing the industry.

KIAA on the other hand believe that these arguments regarding the prohibitive costs of entering the carcass shooting industry for landholders are a wild exaggeration. They content that most landholders should have 4-wheel drives and rifles for other purposes, and claim that the cost of a rack is only approximately $1000 second hand or can be cheaply fabricated in most station workshops.

We accept that the costs of entering the industry including licences, tags, accreditations, equipment, fuel and ammunition are expensive and possibly prohibitive for marginal landholders. However, they are no more or less prohibitive for landholders than for any other potential trapper. In fact, landholders may be perceived as having an economic advantage in that they are close to the source of supply and do not carry the risk of travelling out to a property to find they can not fill their tray on the night. As previously referred to in Issue 20, high costs of harvest will force a rearrangement of pricing structure and operational management to reduce costs wherever possible.

We find it difficult to conceive of how a landholder will defray the cost of entering the industry through shooting skin-only, even without the initial cost of a rack, given that the market for skins is small and likely to be unstable.

**Issue 22. Issues of supply**

There are insufficient kangaroos available in NSW at present to sustain the needs of the carcass industry and this may not change for some years to come according to the Australian Game Meat Processors Association.

We agree with this statement and believe the situation is the same in Queensland. As such even if a decision is made to re-introduce skin-only harvesting, no quota should be allocated as such until the situation settles, possibly not for 4 to 5 years.

**Issue 23. Flexible Management**

DEC must maintain flexibility in management according to the conditions at the time. If in future years, if markets provided under full utilisation scenarios cannot control numbers and assuming welfare consideration can be addressed, the inherent flexibility of the management guidelines should be maintained to allow skin-only shooting.

We agree that an approach of flexible and adaptable management is likely to improve the effectiveness of balancing an overabundant wildlife population, conservation and sustainable commercial harvest. However it must be made clear that DEC is managing kangaroo populations from a conservation perspective and this will always be the case. Also stakeholders must remain aware that to a certain degree, DEC is not in control of the decision making process regarding commercial harvest, as the conditions of the federally administered EPBC Act must be met to provide for export of kangaroo products.

**Issue 24. Conservation benefits from skin-only harvest**

KIAA has submitted that there is no conservation benefit to kangaroo populations in allowing the reintroduction of skin-only harvesting.

We agree that there is no conservation benefit to kangaroos from the re-introduction of skin-only harvest specifically, however there is the ‘long-bow’ argument regarding commercial harvest and conservation. This argument runs along the lines that commercial harvest increases levels of acceptance of numbers of kangaroos in the environment, therefore reducing damage mitigation.
activities that can be inhumane and damaging to local populations. Therefore commercial harvest results in more humane and less unsustainable killing. Some say this argument is ‘drawing a long bow’.

**Issue 25. Poor service in western areas.**

KIAA refutes arguments that there are areas of Western NSW that are poorly serviced by the carcass industry.

We agree with the KIAA on this point. Western areas of NSW appear to be well serviced, particularly if compared to similar areas in Queensland.

**Issue 26. Infrastructure**

KIAA has stated that a re-introduction of skin-only harvesting would cause continued investment in infrastructure by carcass processors to be questioned as short term speculative skin only operations become possible. This could result in less quota utilisation than presently the case.

Whilst this may be the case, we do not agree that a complete review of the decision to invest in infrastructure by carcass processing companies is necessary. This is because skin/carcass buyers currently have the market share, infrastructure and established trade links that mean they can probably out-compete and even force out any new skin buying trade that tries to establish. Also licences are limited in NSW, which means the current arrangement of the industry is likely to persist because there is not open access to the licences required to buy direct from trappers in NSW anyway. Should a skin-only market establish however, we concur that this would be a legitimate reason for the skin/carcass buyers and processors to rethink their level of investment and degree of financial exposure in those areas where they would be impacted by unstable and speculative markets. This could result in less quota utilisation than presently experienced as shown by the QLD case study in the initial report.

**Issue 27. A strong stable industry**

DPI has submitted that it is important that the kangaroo industry remains strong and does not open itself up to destabilisation and further criticism. A risk is that the re-introduction of skin-only shooting would detract from the image of the industry.

We agree with this submission on all points.

**Issue 28. Compliance**

DPI has concurred with the finding of the initial report that skin-only harvests would increase the level of compliance monitoring necessary and reduce the current level of control over animal welfare.

We agree with this submission.

**Issue 29. A benefit to a few**

DPI has concurred with the finding of the initial report that skin-only shooting benefits few people (some landholders) and these landholders can with some investment participate in carcass harvest anyway. The report demonstrates that the skin industry prefers to obtain skins from carcass processors and that overall, benefits to landholders would be small and not worth the damage to industry that might occur from opponents emphasising the negative aspects.

Obviously we agree with this submission.
Issue 30. Decreases in skin markets

DPI has submitted as a reason for supporting a decision not to introduce skin-only harvest, the fact that the report identifies the declining role of skin-only shooting in Queensland where skin only shooting has decreased to low levels in comparison to carcass shooting.

We agree with this submission.

Issue 31. Current program

DPI has offered a statement of support to the current Kangaroo Management Program by submitting that it offers opportunity to minimise kangaroo damage to crops and pastures while maintaining the best opportunities for the long term future for the kangaroo industry.

We agree with this submission.

Conclusions:

The authors stand by the original feasibility report in its entirety and can make no new recommendation to the Advisory Panel. It must be pointed out key issues have been ignored completely by landholder affiliated groups and others alike. These issues include the impact of the ‘new activity’ provisions in the EPBC Act 1999 and the political and legal consequences of the re-introduction of skin-only and its likely impact on an Administrative Appeal Tribunal Process. Furthermore issues regarding the lack of market opportunity for skin-only harvests have been ignored completely by landholder affiliated groups. Some attempt has been made at addressing compliance and administrative issues, however no real suggestions for handling the issues were made by any of the respondents.

References


DEC 2005. Kangaroo Harvest Data, result from internal database. DEC Dubbo

EPA 2005. Macropod Harvest Data, result from internal database. EPA Charleville


Young, M.D. & Morris, G.J. (1985) Economic and Administrative Influences on Kangaroo Management in NSW. CSIRO
Appendices

Appendix A. Submissions received from key stakeholders
Michael Mulligan <mike@sgm.com.au>  
29/03/2006 06:44 AM  
Subject: Re: Skin only shooting

Yes this is our submission so all clear to distribute with additional comments.

----- Original Message -----  
From: Nicole.Payne@environment.nsw.gov.au  
<mailto:Nicole.Payne@environment.nsw.gov.au>  
To: Michael Mulligan <mailto:mike@sgm.com.au>  
Sent: Tuesday, March 28, 2006 1:09 PM  
Subject: Re: Skin only shooting

Mike - did you want me to distribute your email (and your submission from last year) to the other KMAP members? I'm not clear if this is your formal submission or not for the purposes of distribution and I want to check first.

Thanks

Nicole Payne  
Manager, Kangaroo Management Program  
Environment Protection & Regulation Division  
Dept of Environment and Conservation  
PO Box 2111  
DUBBO NSW 2830

Michael Mulligan <mike@sgm.com.au>  
28/03/2006 11:06 AM

To: Nicole/PSEWAN/EP/CP@NPWS  
cc:

Hello Nicole,

Re the matter of Skin only shooting, should it be permitted or not, on behalf of the Australian Game Meat Producers Association I re-submit the comments we sent to you on the 24th November, 2005, our position has not changed from that time to now.
One additional comment I will make is that some people consider not taking of the State quota to be a failure of the programme or of Industry to service the needs of the landholders.

Such a view in our opinion lacks understanding of the realities that Industry faces throughout any one year most of which in one way or another can be related to climate.

Drought rain wind floods fire etc are generally all climatic driven acts of nature and can all have some effect on the ability to harvest Kangaroos and can determine the result on a number or percentage basis of how close to quota the annual harvest programme result will be.

Today, four months since we submitted our original comments to the question of skin only shooting there are still insufficient Kangaroos to sustain the needs of Industry in the State of New South Wales with full carcass utilisation, and it is our opinion this situation will not change for some years to come.

Again, thanks for giving us the opportunity to re-confirm our position on this issue.

Best Regards

Michael Mulligan
President
Australian Game Meat Producers Association

----- Original Message -----  
From: Michael Mulligan <mailto:mike@sgm.com.au>  
To: National Parks NSW / Nicole Payne <mailto:Nicole.Payne@environment.nsw.gov.au>  
Sent: Thursday, November 24, 2005 3:08 PM  
Subject: Skin only shooting

Good afternoon Nicole and Sandra.

This email is for passing on to Consultant Sally Egan.

Our recommendation about if to allow or disallow skin only shooting is to say that National Parks and Wildlife Service / Department of Environment and Conservation, in order to manage Kangaroo numbers efficiently must always be in a position to be flexible according to the conditions of the time.

Right now for instance and most likely for some years to come due to recent years of drought throughout the State, Industries demands for Kangaroo meat will require the available quota and hence full utilisation of the Kangaroo should be a priority and any skin only shooting should not be permitted.

At some time in future years however it could well be as the population recovers that full utilisation of the Kangaroo may not be enough to control numbers, and if that was to be the case and animal welfare issues can be covered, then National Parks and Wildlife Service / Department
of Environment and Conservation should be flexible enough in their management guidelines to permit controlled skin only shooting.

Thank you for the opportunity to comment.

All the best.

Michael Mulligan
Australian Game Meat Producers Association.

This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately. Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the Department of Environment and Conservation (NSW).
Nicole Payne
Manager, Kangaroo Management Program
Environment Protection & Regulation Division
Dept of Environment and Conservation
PO Box 2111
DUBBO NSW 2830

----- Forwarded by Nicole Payne/WESTERN/NPWS on 26/04/2006 10:23 AM -----
Tony English <anthonye@camden.usyd.edu.au>

04/04/2006 11:40 AM
To: Nicole Payne/WESTERN/NPWS@NPWS
cc: 
Subject: Re: Skin Only shooting - AVA

Nicole

The NSW Division of the Australian Veterinary Association endorses the findings of the report number 21147.6087, that a skin-only harvest should not be introduced. Given that the AVA's major concern is animal welfare, there is less concern about the way in which the animals are utilised than about how they are shot, with every effort made to ensure compliance with the Code. From an ethical point of view the AVA believes that the whole carcass should be utilised whenever this is feasible. There is a strong belief that the industry should be moving away from shooting to waste.

Regards

Tony English

At 11:18 AM 3/04/2006, you wrote:

Hi All
Please find below submission from RLPB regarding skin only shooting, distributed for your information as requested

Cheers

Sandra Ryan

For

Nicole Payne
Manager, Kangaroo Management Program
Environment Protection & Regulation Division
This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately. Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the Department of Environment and Conservation (NSW).
Dear Nichole,

Re: NSW Department of Primary Industries position on the feasibility of re-introducing skin-only shooting of kangaroos.

NSW Department of Primary Industries supports the recommendation of the report into the feasibility of re-introducing skin-only shooting in NSW to not re-introduce skin-only shooting.

DPI recognise that the long term future of the kangaroo industry depends on maintaining high standards of management and regulation as dictated by a Kangaroo Management Plan that satisfies the criteria set by the Australian and NSW Governments. It is important that the industry remains strong and does not open itself up to be destabilised and susceptible to further criticism. The promotion and maintenance of a highly professional kangaroo industry is essential to the continuing defence of the industry in Australia and abroad. The risk of re-introducing skin-only shooting is that it would detract from that image.

Opening up skin-only shooting would cause a large increase in the level of compliance necessary and reduce the current level of control over animal welfare.

Skin-only shooting benefits few people. Many of the people that would benefit are landholders and their families. However these people are also able to participate in carcass shooting with some investment. The report demonstrates that the skin industry prefers to obtain skins from carcass processors as this allows better control of skin quality. If skin-only shooting was to be re-introduced, overall the benefit to landholders would be small and not worth the damage to the industry that its opponents could inflict by emphasising the negative aspects.

The Report into the feasibility of re-introducing skin-only shooting in NSW identifies the declining role of skin-only shooting in Queensland where skin-only shooting has decreased to low levels in comparison to carcass shooting. In NSW there is a high utilisation rate of the kangaroo quota without skin-only shooting.
The current Kangaroo Management Program offers opportunity to minimise kangaroo damage to crops and pastures, with the policies adopted by the Department of Environment and Conservation, while maintaining the best opportunities for the long term future for the Kangaroo industry.

Yours sincerely,

Geoff Woods
Regional Director DPI Relations
DPI Kangaroo Management Advisory Panel Representative.

18 April 2006
Kangaroo Industries Association of Australia
(inc)
a Natural Industry, a Natural Product

PO Box 447
Woden, ACT, 2606

Telephone 03 6326 8639   International 61 3 6326 8639
Facsimile 03 6326 2790   International 61 3 6326 2790
e.mail kiaa@bigpond.net.au   Website, www.kangaroo-industry.asn.au

6/4/06

Nicole Payne
Manager, Kangaroo Management Program
Environment Protection & Regulation Division
Dept of Environment and Conservation
PO Box 2111
DUBBO NSW 2830

Re Skin only Shooting

The NSW branch of the KIAA wishes to restate its position held for many years on the shooting of kangaroos for the purpose of skin only sales.

As in the past the industry sees no conversation benefit to the Kangaroo population by the reintroduction of skin only shooting. With the current Kangaroo population historically low and as yet a run of favourable seasons to allow the population to regenerate, demand from the carcass processing sector outstrips supply and is likely to for a number of years to come.

The shooting of Kangaroos only for the taking of their skins is an extreme waste of a valuable resource and would stand to economically benefit a very small number.

The increase in feral animal numbers which would feed on discarded carcasses weather buried, burnt or otherwise, would be detrimental to other native species.

The argument has been put forth time and time again that there are areas of Western NSW are poorly serviced by the current carcass industry and the reintroduction of skin only shooting would allow the utilisation of quota in those remote locations. The KIAA wishes to refute that argument and point out that currently there are more carcass chiller sites than ever before. Many new chiller sites have been established in Western NSW and it is the industry that is making this capital investment into those areas.
If skin only shooting was to be reintroduced those continuing investment discussions would be placed in question and may well be replaced with short term speculative skin only operations with zone dollars invested in infrastructure. These types of operation are quick to establish but are just as quick to disappear when there are down turns in markets. If carcass processors where to remove infrastructure in the face of competition from the skin only industry the long term result is that it may be possible to see Western NSW having less quota utilisation than present if the skin markets soften under a skin only option.

Another common argument put for in support fro skin only shooting is the cost of establishment for the taking of carcasses. This is a wild exaggeration as nearly every station has most of the equipment required to set up for the taking of carcasses, station 4x4s and firearms used for pest control. The only other major expense incurred to set up for carcass shooting is an accredited shooting rack which is readily available second hand for around $1000 or under. Racks can also be fabricated in most station workshops for fraction of the cost of a new one. Chiller and transport cost are generally all incurred by the buyer of carcass so this cost to the supplier of carcasses is not relevant as establishment cost.

Finally the KIAA does not believe that there is any benefit in never considering this proposal ever again and the wording to that effect should be watered down.

King Regards

Michael Cavanagh
31 March 2006

Nicole Payne
Manager, Kangaroo Management Program
Environment Protection & Regulation Division
Department of Environment and Conservation
PO Box 2111
DUBBO NSW 2830

By email: nicole.payne@environment.nsw.gov.au

Dear Nicole

Thank you for the opportunity for NSW Farmers Association to comment on the current review of the NSW Kangaroo Management Program 2002-2006 and draft Management Actions and Performance Indicators. Please find attached some broad comments outlining the Association’s views on a number of aspects of the program.

The Association understands that there will be a further consultation period on the Draft Revised Management Plan following its release on 1 June 2006. We will look forward to providing more detailed comment at this time.

Introduction

The Association supports the commercial harvesting of kangaroos with quotas based on the use of objective, scientific information on populations that demonstrate sustainable numbers and genetic diversity of each of the harvested species.

The Association also supports the harvesting for skins as raised in our submission dated 8 December 2005. The Association would like to also fully support the response by the Pastoralists’ Association of West Darling to the report into the feasibility of re-introducing skin only shooting in NSW which was submitted to the Kangaroo Management Panel 24 March 2006.

The Association also would like to support the submission made to the Kangaroo Management Program Review by the FATE Program. The Association believes that the principles outlined in their submission seek to address some of the underlying problems that landholders associate with Kangaroo Management. That is, landholders have greater ability (and incentive) to manage the populations on their properties. At the same time the vagaries of managing a mobile population are better able to be performed through collaboration across property boundaries.

The FATE Program Concept also appears to hold advantages in building long term secure relationships between landholders and trappers offering benefits to both groups. The more flexible approach which is at the heart of the FATE Program we do not believe would affect
sustainability however it should allow the management of populations in a manner more suited to the behavioural patterns of the kangaroos.

The Association therefore feels that it is essential that the FATE Program objectives and suggestions are fully investigated and considered. The Association feels that trials based on the FATE concept should be facilitated and encouraged as soon as practicable in the next management program and that if successful, adopted as core components of the Kangaroo Management Program. The design of the new Kangaroo Management Program therefore needs the flexibility to be able to accommodate the adoption of the FATE principles.

**Draft Management Actions and Performance Indicators**

The comments below are outlined under the headings of the key aims of the Draft Management Actions and Performance Indicators for the future program. However much of the comments relate to believed areas for improvement of the Management Program and therefore are more comments on the desired outcomes from the Draft Management Actions and Performance Indicators as opposed to strictly altering their wording.

**Aim 1: Licensing of Commercial Operators**

The Association supports the Draft aims and actions associated with the Licensing of Commercial Operators. The Association wishes however to reaffirm the importance of ensuring that trappers return unused tags quickly to ensure that they can be re-allocated for effective use.

The Association considers that stricter rules should be stipulated in the license conditions to try and limit the application for tags beyond that will be expected to be utilized. Penalties (either financially or through means such as license restrictions to limit future quota subscriptions) imposed on those who do not comply with this measure should be increased in the revised program, particularly for repeat offenders. This should help to ensure the full utilisation of the commercial quota.

**Aim 2: Adaptive Management**

The Association approves the objectives and performance indicators described under Adaptive Management. In particular it is essential that the results of any research are published and that the results are validated through adequate monitoring activities. Results made available to stakeholders will facilitate educated decisions being made in relation to achieving the overall goals of the program.

Flexibility needs to be built into the program to ensure that potential improvements to the program can be adopted after appropriate consultation. An example of this was in the management of the 2006 Quota where it was proposed to change to withholding 60% of the available quota for each species in certain affected zones for release on 1 June. This change was designed to better match the availability of tags to the demand for tags during...
the critical crop and pasture protection periods and therefore provide a worthwhile improvement to the program.

As discussed in the introduction, the FATE Program also needs to be able to be suitably accommodated within this section of the Management Actions and Performance Indicators.

**Aim 3: Monitor Kangaroo Populations**

The Association has some points that it would like considered under the Objective “Set Commercial Quotas”. The set commercial quotas discussed in the draft document refer to the commercial quotas based on percentages of estimated population size for each of the harvestable species.

The Association accepts the methodology that Department of Environment and Conservation has used to estimate population size (that is; aerial, helicopter and ground surveys) and is of the opinion that the methodology is adequately explained and justified.

The Department of Environment and Conservation use percentages of the estimated populations to calculate the proposed quota. These percentages are:

- 17% for Red
- 15% Eastern Grey (Tablelands) Kangaroos
- 15% for Eastern Grey (Western Plains) and Western Grey Kangaroos
- 15% for Wallaroos (Tablelands)

In normal seasons, the Association believes that the above quota percentages are too low and should be returned to the levels that operated prior to the changes that were made in estimating kangaroo populations.

The Association recognises that the kangaroo population has been affected by the present drought and it is therefore acceptable that the quota be based on the above percentages of reduced population estimates. However, given this endorsement, the Association strongly suggests that as per outlined under Action 6, that the Kangaroo Management Program should take account of seasonal conditions and population response of kangaroos in relation to those conditions, and should be adjusted annually.

The special quota is seen as a special damage mitigation quota to minimise the number of kangaroos shot under non-commercial licences. The Association feels that where the commercial quota is fully taken up, the Department of Environment and Conservation need to take account of landholder concerns in relation to the need for access to the special quota for mitigation control.

The Association once again encourages the Department of Environment and Conservation to keep a close watch on the seasonal conditions that apply locally when issuing permits under this quota. The fact that the proposed quota may not be taken up by commercial interests does not reduce the need in some instances for producers to access the special quota.
Aim 4: Monitor Industry Compliance

The Association supports all the provisions outlined within the section Monitor Industry Compliance. Particularly any activities within the Program that try to ensure the use of tags against the property on which they were allocated are encouraged.

Aim 5: Program Audit and Review

The Association is supportive of the activities outlined within Program Audit and Review.

Aim 6: Community Awareness and Participation

The Association believes that Communication activities are essential to a successful program. We have experienced problems amongst our membership due to lack of knowledge regarding the quota system and how it is allocated.

The Association feels that greater communication to producers is important so that they know what their rights are, and what they should and can expect from a trapper. The relationship between landholders and trappers would be improved if there were clear understandings as to the rights of each.

Additionally we are aware that license holders sometimes face throughput and viability problems due to their lack of knowledge in regards to the processes involved in quotas. They too would greatly benefit from printed communications materials that detail the process that will be followed for quota allocations and specific dates that they should be aware of.

Once again I thank you for the opportunity to put forward comment for the review of the Kangaroo Management Program and look forward to viewing the draft Revised Management Plan in the coming months.

Yours sincerely

Bill Murray
Chairman - Western Division Council
Ms Nicole Payne
Manager Kangaroo Management Program
Department of Environment and Conservation
Level 1. 48 – 52 Wingewarra Street
DUBBO NSW 2830

Dear Nicole,

The Pastoralists’ Association of West Darling is pleased to present a submission for the Re-introduction of Skin Only Shooting to the Kangaroo Management Advisory Program.

The Association is concerned that in the drought years from 2000 to 2003 the quota was under utilized mostly due to the emaciated condition of Kangaroos making them unviable for carcass take.

This resulted in large numbers of animals dying in the field which could have otherwise been utilized for skins. The results being the Kangaroo industry lost a viable resource when it was most needed and secondly the environment was placed under further pressure as the ability to reduce grazing pressure at a critical time was not available.

Please accept this submission which has expanded the Association’s reasons for the Re-introduction of Skin Only Shooting.

Yours faithfully,

R D Andrews
PRESIDENT.
SUBMISSION

POLICY FOR RE-INTRODUCING

SKIN ONLY SHOOTING

TO THE

NSW KANGAROO MANAGEMENT

ADVISORY PANEL

24.3.2006
As outlined in all previous submissions it remains the policy of Pastoralists’ Association of West Darling to support the re-introduction of skin only shooting into the NSW Kangaroo Management Program.

The report into the feasibility of re-introducing skin only shooting in NSW, compiled by Sally Egan raises some very valid issues which have been addressed in the submission below.

**FULL UTILISATION OF RESOURCE:**

The argument that skin only shooting results in wasted resource is hard to support when figures from the last ten years indicate that the NSW quota has only been fully utilized once in the 1995 to 2004 period.

Given that the filling of the full quota will result in the best outcomes for the ongoing viability of the species, the re-introduction of skin only shooting will move the industry closer to full utilization of the quota on an annual basis. This can only be seen as a positive for the long-term sustainability of Kangaroos and the Environment.

It should also be noted that in the drought years from 2000 to 2003 the quota was under utilized mostly due to the emaciated condition of Kangaroos making them unviable for carcass take. This resulted in large numbers of animals dying in the field which could have otherwise been utilized for skins. The results being the Kangaroo industry lost a viable resource when it was most needed and secondly the environment was placed under further pressure as the ability to reduce grazing pressure at a critical time was not available.

Consequently the Kangaroo population and the environment were adversely affected. This is illustrated by the massive reduction in Kangaroo population over this period and the corresponding under take of the quota.
ADMINISTRATION:

The Pastoralists’ Association of West Darling proposes the following:

Should skin only shooting be re-introduced, tags would be available to all commercial trappers and landholders alike.

A policy on tag allocation has previously been submitted. The Pastoralists’ Association of West Darling suggests that the average difference over the previous 5 years between quota and actual take be allocated as skin only tags. This could be monitored quarterly and adjusted as market forces and consequently quota utilization numbers require.

This process should streamline re-introduction and keep administrative workload to a minimum.

COMPLIANCE:

In relation to concerns of a less professional attitude prevailing to skin shooting this is difficult to ascertain. Firstly with the high cost of per head take (approx $6.00) to the shooter it is in the shooters best interest to maximize the economic value of each kangaroo consequently a professional approach is required to remain viable.

Should skin only shooting be re-introduced the Pastoralists’ Association of West Darling would support the policy that all shooters/ trappers be required to complete the current Game Meat Handling course and undergo Firearms Competency and Accuracy tests prior to being accredited, as is the case currently for all commercial trappers.

In addition the checks and measures currently in place within the industry should be effective in ensuring the industries high standards are maintained.

In relation to the illegal sale and trade of skins without tags, compliance should be sought from the fauna dealers. They have raised the issue of industry destabilization; these being a small select group who have a vested interest in the industry. The fauna dealers should be capable of enacting and enforcing suitable codes of conduct to ensure this type of activity is not committed.
MARKET ISSUES:

Many issues are raised regarding the market for skins. The issue that skin shooting has the potential to destabilize the industry is again difficult to substantiate. If the Pastoralists’ Association of West Darling tag allocation proposal be adopted with no more than 20% of the quota taken in skins it is difficult to believe that this would destabilize the industry.

The industry is driven by market economics, and should the wholesalers have a preference for whole carcass utilisation this should be reflected in the price paid to shooters.

Particular reference should be made to the feasibility study Page 13 Paragraph 4 which clearly outlines that no one factor determined the level of quota utilization or mix of carcass / skin take in Queensland. Rather it was a complete mix of market forces, economics, population density, climate and technology that determined the level of quota utilization and the preference for either carcass or skin take. In view of this there is no basis to argue that the re-introduction of skin only shooting will have any adverse affect on the market or industry.

In relation to concerns of poor quality skins a code of practice for preparation, and storage of skins could be developed in consultation with fauna wholesalers.

The issue of smaller animals being taken is easily overcome by the establishment of a minimum acceptable skin size. Both of the above issues again would be regulated via market economics as trappers and wholesalers seek the best economic returns.

CARCASS DISPOSAL:

Under the current carcass take the guts, hoppers and tail are left in the field, this discarded matter is sufficient to support a fox population. With the re-introduction of skin only take and the pitting of the meat it is difficult to believe this will contribute to the increase of the fox populations.
ECONOMICS:

There are a number of economic factors which need to be considered.

1. • The remoteness of Western NSW.
   • The placement of chillers is a significant consideration.
   • The high cost of transport
   • Transport costs in particular as diesel and petrol prices continue to increase. As such the re – introduction of skin only shooting will help to reduce transport costs and improve quota utilization in isolated zones.

2. • The industry is well provided for by landholders
   • It is the infrastructure and maintenance of watering points by landholders that support the kangaroo population and consequently the Kangaroo Industry.
   • It is only fair that landholders then be given reasonable opportunity to access economic return from the industry they provide for.

The high establishment cost for carcass specific trays, chillers, and petrol /cartage costs is a major barrier for landholders accessing the industry. For this reason it is extremely important to landholders to see the re–introduction of skin only shooting into the NSW Kangaroo Management Program.

IN CONCLUSION:

This submission clearly outlines there is no real basis to exclude skin only shooting from the Kangaroo Management Program and that market forces will provide the best balance for full utilization of resource and quota take.
29 March 2006

Nicole Payne
Manager, Kangaroo Management Program
Environment Protection & Regulation Division
Dept of Environment and Conservation
PO Box 2111
DUBBO NSW 2830

Dear Nicole

I write to you regarding the Report into the feasibility of re-introducing skin-only shooting in NSW. Outlined below is a brief submission on the proposal.

State Council would like to add the following comments on the proposal:

- Support is given for the reintroduction of skin-only shooting of kangaroos in NSW. The carcass industry has in most cases not taken the full quota since 1963 and the increasing population cannot be sustained without adversely impacting on land degradation and landholder sustainability. It is also acknowledged that this process needs to be managed suitably where other conditions, such as the ongoing drought, also impact on the kangaroo numbers. It should be noted that shooting for skin-only is available in Queensland.
- Currently, shooters have to take more carcasses to achieve an economic weight per night to stay viable due to the dramatic decrease in the amount of pasture available to kangaroos. The deterioration of carcass condition is lowering its value and the skin can become as valuable as the carcass.
- Kangaroos become a pest to landholders at certain times and control is a financial cost to landholders. The option of skin-only shooting will allow landholders to recover some of the costs associated with pest control. This provides the landholder with another tool to assist them in effectively managing their land resource.
- The kangaroo, as a resource, should be harvested to its full potential which includes both meat and skin. If the population increases dramatically as seasonal conditions change, other options should be available to allow control to protect the economic viability of landholders who are also trying to recover when seasonal conditions improve.
- Concerns over pest animal access to carcasses can be minimised by landholders through; using carcass meat for fox baiting, using carcasses in traps for feral pigs, pitting of carcasses and burning of carcasses.
- Reintroduction of skin-only shooting will allow the landholder or contractor to revert to skin-only shooting in areas where carcass take is limited, which in turn increases their viability. It also allows quotas to be filled in areas where it is difficult to take the required carcass numbers due to inaccessibility.
• The report recommends that the final decision (whatever it may be) should never be discussed again. State Council queries this comment and recommends that a review process be considered as part of the process.
• Most landholders do not receive any income from kangaroo harvest on their land and this should be an option. The reintroduction of skin-only harvesting can benefit landholders in remote areas economically and assist in reducing total grazing pressure.

Thankyou for the opportunity to raise these comments with you and State Council looks forward to a favorable outcome on the possible reintroduction of skin-only kangaroo shooting in NSW. Please do not hesitate to contact myself or Simon Oliver, Pest and TSR Manager for State Council on (02) 63913154 if you would like further information.

Yours sincerely

Steve Orr
Chief Executive Officer