

## **NPA submission on the Buru (Eastern Grey Kangaroo) Draft Controlled Native Species Management Plan October 2025**

### **Preamble**

The ACT Government is to be commended on its use of Ngunnawal language for key management plans and policies.

The NPA highly recommends that a community education campaign be implemented to inform the Canberra community of this and other Ngunnawal words used by the ACT Government.

In circulating this draft management plan to members for review, many members including President Rosemary did not know *Buru* was the Ngunnawal word for Eastern Grey Kangaroo. This Management Plan is a key tool in the management of ACT Wildlife, and will be of interest to many in the community. It is therefore crucial that all the language used in this draft management plan is accessible and understood by all.

The community education/information campaign should also include references to the Ngunnawal source for the word, and possible conflicting definitions.

Of note is that the Dharug and Dalang Resources Dictionary gives the following definition of Buru:

*The kangaroo is called Buru (older male). If a badagarang was to reach the status of buru he would have survived a long life, with all respects being paid accordingly. There are other names also for the female kangaroo, she is known as a badagarung.*

[https://dharug.dalang.com.au/plugin\\_wiki/page/kangaroo#](https://dharug.dalang.com.au/plugin_wiki/page/kangaroo#):

This definition implies that Buru only refers to older male kangaroos.

### **Overall evaluation and general remarks**

An eminent authority reviewing the 2010 kangaroo plan stated that:

*This plan will serve as a model for the management of kangaroos, and other wildlife, elsewhere in Australia.* (Coulson 2010).

A different eminent authority stated in regard to the 2017 plan that

*the planning, implementation, monitoring and reporting for kangaroo management in the ACT is extremely impressive and an outstanding exemplar for adaptive management'* (Legge 2024, pg. 32)

Reviewers of this 2025 – 26 plan will need to come up with new superlatives that exceed even those words because this plan is significantly better than either of its predecessors. The policies put forward for public comment in the 'Buru (Eastern Grey Kangaroo) Draft Controlled Native Species Management Plan (CNSMP)' are succinctly justified with logical argument and ample references to the scientific literature.

The NPAACT particularly supports the retention of the primary goal from the 2010 and 2017 plans to 'maintain populations of Buru as a significant part of the fauna'. This goal immediately distinguishes the management of Buru in nature reserves from pest management and clarifies that Buru are being retained at a particular density, not eradicated.

It is also good to see related policy documents specified (in 3.1). Government documents too often fail to explain their relations to other government policy documents. Perhaps your explanation could be further developed for the final plan by briefly defining the role of each of the policy instruments listed.

New principles introduced in this plan are welcome, as is the specific mention of principles previously adopted but not spelled out in earlier plans, including:

- use of Ngunnawal names for fauna
- greater recognition in principle of Indigenous perspectives
- increased emphasis on the desirability in principle of transparent communication of the plan
- assessment based on international principles for ethical management of wildlife
- use of the One Welfare framework
- continued emphasis on evidence-based management
- specific mention of the licensing of Commonwealth agencies, which carry out a conservation cull of similar size to the one managed by the ACT, or larger.

We support all of these intentions but have concerns about the delivery of some, as explained in later sections.

### **Indigenous fauna names and greater Indigenous recognition**

Further to comments in the Preamble, we welcome the use of Indigenous terms for native organisms, including the two kangaroo species referred to as *Buru* and *Walaru* and the three wallaby species referred to as *Baray*. (It is also appropriate to be reminded by the Baray name that the species concept is a relatively modern Western idea and was not always how other cultures perceived the natural world. The basic message is that different cultures have different perceptions of living organisms).

In the final CNSMP could you also indicate the correct pronunciation of these names in the first paragraph and in section 3.1.

The additional principle to include Indigenous perspectives is welcome. It will be interesting to see how this challenging proposal develops. The plan should refrain from unduly prescriptive statements or detailed performance targets on this point because the initiative must, in part, grow organically from within the local Aboriginal communities.

### **Policy gaps (1) – Human welfare**

Human welfare is identified in several places as a key consideration in reaching policy decisions. For example, there is mention of the distress some people experience from knowing that Buru are being culled. But the elephant in the room, which seems to get little or no consideration in the plan, is the injuries and deaths resulting from motor vehicle collisions with Buru. Injuries and deaths are a significant welfare impact.

It can be conservatively estimated that more than 100 people are injured each year in the ACT in motor vehicle collisions with kangaroos, and there are occasional deaths. This is a much greater effect on human welfare than the other example given here, but its impact has been omitted or barely mentioned.

For the final plan, ACT human health statistics relating to kangaroos should be obtained to enable a more informed judgment on this point. Until then, we have on the public record only Ramp and Roger 2008 (full reference given in the CNSMP), who found an impressively large NSW statistical database that (i) kangaroos were responsible for more human road trauma deaths than any other animal species, and (ii) there were several times more motor vehicle collisions with kangaroos in the Yass-Goulburn-Queanbeyan triangle than elsewhere in NSW.

Ramp and Roger (2008) had no ACT data in their sample, despite their paper captioning the above triangle as the 'Canberra' triangle. It is certain that if they had added Canberra roadkill data to their analysis, the Yass-Goulburn-Queanbeyan triangle would have shown up as a much higher pyramid than any other place in NSW.

This is a far bigger issue for Canberra than it is for anywhere in NSW.

### **Policy gaps (2) – Animal welfare of other species**

Animal welfare of Buru, meaning the minimisation of any suffering caused by humans, is given considerable attention in relation to a wide range of circumstances, occupying several whole pages. This is appropriate of course. However, the animal welfare of the species which benefit from the cull has been entirely overlooked. If Buru culling was to cease, not only the conservation but also the animal welfare of these animals would suffer. Thus, the negative welfare impacts of the cull on Buru are offset by positive ones on much larger numbers of individuals of the other animal species which would have suffered and, in many cases, died but for the culling of Buru. Dozens of vertebrate species are affected. Under the new amendments to the Animal Welfare Act, these hundreds of thousands of individual animals are defined as 'sentient', fully capable of suffering. If there are any welfare concerns about the effect of the cull on Buru, they are offset many times by the improved welfare of the other vertebrate inhabitants (both native and exotic) of the grassy ecosystems.

### **Policy gaps (3) – Animal welfare is proportional to number of animals affected**

It is a well-accepted principle that suffering caused by an action is multiplied by the number of animals affected. Therefore, to cull in a way that results in more animals being affected in the long term is less acceptable than the reverse. This principle appears not to have been well articulated in the plan.

Because populations grow exponentially (i) culling to a certain level affects fewer animals if the culls are more frequent (e.g. annual rather than triannual); and (ii) culling to a lower density affects fewer animals in the long term than 'light' culls, which leave behind a higher density of animals. Therefore, the culling strategy has animal welfare effects, as well as effects on kangaroo impacts and cost of control.

Rural landholders in particular should be encouraged to cull annually and preventively rather than letting populations grow to troublesome levels before intervening. (The same applies to all controlled species, e.g., feral pigs and rabbits).

### **Policy gaps (4) – Heart-lung shots**

An equal animal welfare standard must be applied to all wild animals of the same capacity to perceive pain and stress. There is no ethical justification for setting a higher animal welfare standard for more appealing species, or native species, for example. Yet the cranium is the target, and shooter testing is applied only in relation to one appealing native species. All other mammals except kangaroos (including three deer species, feral horses, feral pigs, feral goats, feral livestock, foxes and feral cats) must, by law, be killed humanely, but heart-lung shots are routinely applied and there is no shooter testing. If heart-lung shots are acceptable for all the other species, they should also be considered acceptable for kangaroos. Shooter testing has proved to have huge benefits, according to staff who have conducted them.

Therefore, the NPA calls for two changes:

- a. Abandonment of the requirement to shoot kangaroos in the cranium; and
- b. Implementation of testing for all ACT shooters of wild, free-range animals.

### **Ecosystem restoration is a valid use for carcasses, probably the best use**

When animals feed, they move nutrients to a higher trophic level of an ecosystem. In natural systems the nutrient 'debt' resulting from a lifetime of feeding is 'repaid' due to decomposition processes. In a modified ecosystem such as a grazing property, where animals are harvested, nutrients are exported to the abattoir via the saleyard, and the debt is repaid by importing superphosphate from guano-rich seabird islands.

All forms of carcass utilisation mentioned in the Draft CNSMP are examples of such farm-style harvesting. So far there has been no super spreading. (Supply of carcasses to traditional owners is no exception because the owners are no longer part of the ecosystem – in this case also, the nutrients are being exported off site without replacement).

We suggest that CSE needs to start recognising a new use of carcasses: i.e. nature restoration. Instead of deep burial of carcasses, CSE should find ways to get the nutrients in the carcasses back into the ecosystem, and openly state that the carcasses ARE being 'used' in this way. Of all the options, this is the most valid 'use' possible.

The carcasses of thousands of culled horses are left to decompose naturally in Kosciuszko National Park, despite criticism from the brumby lobby, so why can't the carcasses of much smaller numbers of kangaroos be treated the same way? But if it is unacceptable to do that then please find other ways, e.g. mince them up first, or convert them to pellets. But please use them for nature restoration.

There is also a deeper question about this 'utilisation', i.e. use, of carcasses. The removal of carcasses from conservation areas is a form of wildlife harvesting which has not been formally dealt with as a policy issue in the CNSMP. It arises from a misinformed expression of desire for the 'meat to be used, not wasted'. That misinformed opinion should be managed by CSE through education. Instead, with no attempt to explain the issue to politicians or the public, 'carcass utilisation' has received an unplanned or poorly planned knee-jerk response by CSE, with no formal policy process.

Wildlife harvesting is a notoriously fraught business. You need to address this policy issue in the final plan, but our advice is to minimise the harvesting of carcasses from the reserves and start working toward a stage when you use all carcasses (or derived products such as pellets) to restore the nutrients to where they were removed. And please start doing some education about this issue.

### **Impoverished communications will lead to greater difficulties with the community**

Near the start of Section 3 is a table that states five 'principles applying to the plan'. The fifth indicates that communication of the plan's goals and activities will be undertaken. In a second paragraph it also refers to communication between researchers, managers and other stakeholders. With respect, the latter point about internal communications is part of your internal business management and does not count as 'communication' in this context. It probably should have no place in the CNSMP. The former is legitimate communication, and indeed it is a requirement for success of any government activity. However, the restricted scope as stated is too narrow to enable success with anything as controversial as kangaroo management in the ACT.

We are disappointed that the policy within CSE has changed about the importance of kangaroo information. Removal of much material from the kangaroo web page in recent years is a sign that the narrow scope stated in the CNSMP is really your deliberate policy, not an oversight. We respectfully disagree. You will lose the support of many people in the middle of the culling debate if you do not provide ample information and explanation of policies. This lesson was demonstrated well in the 2007 – 10 years when conservation culling was commencing in the ACT, but appears to have been forgotten. Is that part of the reason why your cull approval rating went down in your latest Micromex survey?

Therefore, we are sceptical that the principle (which we supported above) of increased emphasis on transparent communication of the plan will in fact be delivered satisfactorily

We suggest that instead of working with the current arrangement for communications, resources should be provided to Office of Nature Conservation to

run their own science -based web page at slightly greater distance from the minister's media adviser and the departmental communications team.

### Concerns with performance indicators

Many performance indicators (PI) are improved and clearly follow the SMART methodology. However, there are many others that are statements rather than PIs with no effective measures, or which are so vague as to be almost meaningless to anyone but the author.

- The phrase 'in a timely manner' is used repeatedly but is extremely vague. Please give indicative times.
- Given that most shooting is at night, the justification for the change to daytime only testing of shooters should be explained.
- The veterinary auditing needs to be better justified. Other jurisdictions do not have it. We question whether it is necessary in the ACT. The community groups who allege cruelty have no respect for what veterinarians say whether they are various, different ACT Government veterinarians or the extremely experienced independent vet, Jordan Hampton.
- If you insist on having veterinary auditing, then you could rewrite the PIs to reduce vagueness about how much will be done and what your response will be.
- B4 Culling SOP. Why will it take until May 2027 to develop? Surely you have most of this already written? Will it be revised annually?
- Urban Wildlife Program – The PI '*Injured, sick or accidentally confined/trapped Buru are attended to in a timely manner*' is no PI at all. Surely the Urban Wildlife Program has something more specific, e.g., '*97% of calls during business hours will be resolved within 2 h and 90% of calls outside business hours will be resolved within 3 h*' or whatever.
- Urban Wildlife Program – There is nothing here about the analysis and review of all the data recording mentioned. Can that be added for the final plan, please.
- D3 Transparency requires publication of details about the calculation of number to cull in reserves each year. Why is this not being provided annually?
- F8 The PI is 'Proportion of cull target achieved'. Does this mean:
  - the proportion of sites in which the cull target was reached;
  - the proportion of sites in which the cull target was achieved to a high degree, e.g. 90%;
  - the proportion of the total number of kangaroos to be culled in all reserves combined that were in fact culled;
  - the proportion culled of the target number per reserve averaged across all reserves; or
  - something else?
- Outcome 6. As indicated above, the removal of carcasses from the environment is a form of kangaroo harvesting. We object to the unofficial, unplanned, ad hoc nature of this harvesting program and suggest you use the carcasses for ecological restoration.
- N1 The proportion of carcasses used to make baits is an inappropriate PI as applying it is quite problematic. First, it is greatly influenced by an independent

program. (If the dingo program became so successful that no dingo baits were needed, would you make poison baits and throw them away in order to do well on this PI?) Second, the PI depends heavily on carcass size. If you used pouch young to make baits, the performance on this criterion would skyrocket.

- P1 The road-injured and road-killed kangaroos attended by rangers are a small subsample of the kangaroos struck by vehicles. And it is almost certainly a biased sample. You need to also use other ways (e.g., interviews of randomly chosen ACT drivers) to gain a better perspective on the motor vehicle collision issue.
- Q1 to Q3 The design standards for ACT roads need to be amended to make them more wildlife friendly, not just for kangaroos. Many of the required changes cost little or are cost free.

We would of course be happy to discuss with you the issues we have raised in our submission.

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