CONSERVATION COUNCIL ACT REGION

Submission to the City and Environment Directorate

Draft Buru "Eastern Grey Kangaroo" Management Plan

December 2025

About the Conservation Council ACT Region

The Conservation Council ACT Region is the peak non-government environment organisation for the Canberra region. Since 1981, we have spoken up for a healthy environment and a sustainable future for our region. We harness the collective energy, expertise, and experience of our more than 40 member groups to promote sound policy and action on the environment.

We campaign for a safe climate, to protect biodiversity in our urban and natural areas, to protect and enhance our waterways, reduce waste, and promote sustainable transport and planning for our city. Working in the ACT and region to influence governments and build widespread support within the community and business, we put forward evidence-based solutions and innovative ideas for how we can live sustainably.

At a time when we need to reimagine a better future, we understand that the changes we need will only happen with the collective support of our community.

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Introduction

The Conservation Council ACT Region appreciates the opportunity to provide comments to the Flora and Fauna Conservator regarding the Buru "Eastern Grey Kangaroo" Management Plan under the Controlled Native Species Management Plan. Buru management remains one of the most complex and contentious issues in the Australian Capital Territory (ACT). While the Buru are an iconic national symbol, their population dynamics create significant ecological, social, and economic challenges. The ACT Government's Kangaroo Management Plan (KMP) seeks to balance conservation goals with humane treatment, but it continues to attract scrutiny from advocacy groups (Animal Liberation ALACT, Save Canberra's Kangaroos SCK). The Conservation Council recognises that managing Buru numbers is essential for ecosystem health, but also stresses the need for transparency, accountability, and investment in long-term solutions.

Background

The Eastern Grey Kangaroo (Macropus giganteus) is the dominant native herbivore in the south-eastern bioregion. It was declared a controlled native species under the Nature Conservation Act 2014 in 2017, reflecting concerns over its growing impact on grassland and woodland ecosystems. Female kangaroos are capable of breeding year-round, and in the absence of natural predators such as dingoes, populations have consistently risen rapidly. Urban development has closed many migration corridors, leaving kangaroos concentrated in limited areas where grazing pressure exceeds ecological capacity.

Studies estimate that some grasslands in the ACT have supported densities of up to 700 kangaroos per square kilometre, which many ecologists consider unsustainable. Other studies suggest that a density of around one kangaroo per hectare, equivalent to 100 per square kilometre, may still be compatible with ecological balance in certain landscapes. Regardless of the variations in different studies, we, the Conservation Council, concur with researchers who concluded that high concentrations place significant pressure on grassy ecosystems, including endangered Yellow Box and Red Gum woodlands. Excessive grazing reduces ground cover, alters species composition, and degrades soil quality. The resulting loss of vegetation affects both flora and fauna, creating cascading impacts across entire food webs.

Policy and Legislative Context

The ACT Kangaroo Management Plan (KMP), first prepared in 2010, sets the framework for managing kangaroo populations within a legal, scientific, and social context. Since its inception, the plan has been updated to reflect new research, ecological priorities, and social expectations. Once a species is declared a controlled native species, the Conservator prepares a management plan detailing appropriate conservation culling, consistent with the Nature Conservation Act 2014, the Planning and Development Act 2007, and the Animal Welfare Act 1992.

The ACT adopted the National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Non-Commercial Purposes in 2013 (The Natural Resource Management Ministerial Council, NRMMC 2008b). Culling is strictly regulated to minimize welfare impacts, with specific restrictions on the timing of female culling to reduce the risk of orphaning

dependent young. The KMP aligns with precautionary principles, requiring consultation with expert ecologists, operational program coordinators, and local land managers when assessing site-specific conservation needs.

Buru "Kangaroo" Management Objectives

We, the Conservation Council ACT Region, acknowledge that the primary objectives of the KMP are to maintain healthy kangaroo populations relative to grassland condition and overgrazing, and to manage and minimize adverse environmental, economic, and social impacts. Culling decisions are informed by three main factors: the adjusted target density, current population, and projected population growth. A density of approximately one kangaroo per hectare is considered appropriate for sustaining a healthy equilibrium between grazing pressure and vegetation structure.

Seasonal timing is a key consideration. Kangaroo management activities are more likely to be implemented in the dry and hot season, when the land is most vulnerable to overgrazing. The Reserve Prioritization Framework developed by ACT Parks and Conservation Services supports targeted interventions. Sites are evaluated for endangered ecological communities, the presence of threatened species, the relative risk of permanent habitat loss, and prior and ongoing conservation investment. The framework allows managers to strategically allocate resources to protect species such as the Grassland Earless Dragon, Striped Legless Lizard, Golden Sun Moth, Button Wrinklewort, and Ginninderra Peppercress.

Furthermore, the Conservation Council also supports complementary strategies, such as fencing, exclusion areas, and habitat restoration, which play a vital supporting role in delivering an effective controlled native species management plan. At sites like West Majura Grassland, integrated management has demonstrated the benefits of combining targeted culling with investment in ecological infrastructure.

Population Surveys and Monitoring

Effective management relies on accurate population data. The ACT's KMP uses several methods, including repeated counts, GPS collar tracking, and climate-based population modelling. Grassland condition is assessed through the Step Point Survey, where observers take 75 steps and record ground cover at each point, providing a measure of vegetation quality and biomass availability.

Despite these methods, challenges remain. Young in pouches are easily missed in surveys, while dense vegetation can obscure counts. The reliability of contracted reports, such as those by Kurahaupo Consulting, has also been questioned, with critics arguing that population estimates lack transparency. We, the Conservation Council, strongly suggest that continued improvement in survey methods is essential. Incorporating aerial photography and remote sensing would provide stronger evidence of land degradation, demonstrating the ecological impacts of overgrazing more visibly to the public.

Ecological Impacts

Excessive grazing by high-density kangaroo populations significantly reduces vegetation biomass, alters plant composition, and impacts native fauna. Research demonstrates that lower kangaroo densities benefit reptiles, including lizards and other ground-dwelling species, and increase the diversity of invertebrates such as beetles. Conversely, high kangaroo densities do not support reptile populations and can contribute to declines in other herbivores dependent on grassland ecosystems.

Habitat loss due to grazing also affects woodland birds, with studies indicating declining populations where kangaroo density is high. Overgrazing can exacerbate soil erosion, reduce seedling recruitment, and alter ecosystem function. By managing kangaroo numbers, the KMP aims to maintain ecosystem resilience and ensure the persistence of species reliant on healthy grassy and woodland habitats, aligning with our core objective of conservation and biodiversity.

Social and Economic Impacts

The most visible social impact of high kangaroo densities is the frequency of vehicle collisions. Between 2016 and 2023, road accidents killed more kangaroos than conservation culls. These collisions cause human trauma, financial loss, and often result in prolonged suffering for injured animals.

High kangaroo densities also impact rural land productivity. Overgrazing can reduce the quality of pasture for livestock, leading to declines in productivity and sustainability. Fences and property infrastructure are frequently damaged by kangaroos, creating additional costs for private landowners and government agencies. Social impacts include trauma associated with vehicle collisions and occasional kangaroo attacks on humans.

Opposition and Debate

Opposition to kangaroo culling remains strong among certain community groups. In February 2025, Save Canberra's Kangaroos (SCK) and Animal Liberation lodged an official complaint with the Commissioner for Sustainability and the Environment, condemning the ACT Government's failure to preserve the national animal. The complaint accused the government of greenwashing by withholding details of the Kangaroo Audit process and claimed the Legislative Assembly's environment committee declined to investigate the KMP. It is further alleged that Animal Liberation ACT was deliberately excluded as a stakeholder in the kangaroo policy.

The complaint also criticized the reliability of Kurahaupo Consulting's population counts, dismissing the report as a "cynical joke". While research found the evidence presented in the complaint to be underwhelming, the concerns highlight the importance of transparency. We, the Conservation Council, encourage the government to improve trust by publishing more conspicuous evidence, including aerial photographs of land degradation caused by overgrazing; for example, images 1 and 2 from the Texas corn field destruction caused by feral hogs.

Image 1 & 2

Source: Glow P Et al Feral Swine

Fertility Control Research

Fertility control is frequently proposed as a humane alternative to lethal culling, yet it remains complex in practice. Success depends on both the duration of fertility suppression and the

practicalities of delivering contraceptives to large populations. With Eastern Grey Kangaroos numbering in the hundreds of millions nationally, fertility control alone cannot achieve population targets at the scale required in the ACT.

Research offers some promise. Baker et al. studied the GonaCon vaccine on feral horses in Theodore Roosevelt National Park (TRNP) South Unit, Southwestern North Dakota, finding it highly safe, effective, and long-lasting. The study reported no negative impacts on animal behaviour, mobility, or social structures. Recognizing this, the ACT Government introduced trials of GonaCon in 2022, working with CSIRO to explore its application for kangaroos.

The Conservation Council acknowledges these efforts as an important step toward a humane, ecological, and environmentally friendly solution. However, until fertility control technologies become scalable and cost-effective, lethal culling remains the most viable management tool. Investment in long-term research is crucial for shifting toward non-lethal strategies in the future.

Comparative Lessons from Other Regions on Controlled Species

Other cases of herbivore overpopulation illustrate both the risks of unmanaged populations and the importance of human, science-based interventions:

Case	Impact	Management	Relevance to ACT
Texas feral hogs	Severe agricultural and ecological damage due to high fertility and group behavior.	Year-round hunting, toxins, sport killing (often inhumane).	Demonstrates risks of unchecked populations and highlights inhumane practices to avoid.
Yellowstone elk	Elk overgrazing after predator removal caused ecosystem collapse, reduced berry supply for bears, and resulted in riverbank erosion.	Wolf reintroduction in 1995 restored balance within years.	Suggests potential for predator reintroduction, such as dingoes, to regulate kangaroos naturally.
Europe's feral Boar	Spread of diseases to livestock, vehicle collisions, and damage to crops.	Culling, trapping, NO Sport hunting, and fertility control.	Evidence on efficiently deploying vaccines can reduce more lethal interventions.

These comparisons highlight that while lethal control is often necessary, long-term ecological balance may require more innovative and systemic approaches.

Past and Current Conservation Council Positions

The Conservation Council has consistently supported ecological culling of Eastern Grey Kangaroos, provided it is conducted humanely in accordance with ACT animal welfare codes and the National Code of Practice. Our 2017 submission emphasised that uncontrolled kangaroo populations adversely affect ecosystems, including grasslands, insects, and other native fauna. During that period, fertility vaccines were still under research; the GonaCon immunocontraceptive vaccine is now being introduced as an additional management tool.

Conclusion and Recommendations

Kangaroo management in the ACT must balance ecological integrity, animal welfare, and community expectations. Evidence demonstrates that without active control, kangaroo overabundance degrades grasslands, threatens endangered species, and creates social and economic costs. Humane culling, conducted in compliance with national codes, remains the most effective management tool, but it should be complemented by ongoing research into fertility control and broader ecosystem solutions.

We, the Conservation Council ACT Region, welcome the new principles proposed by the Conservator, particularly the inclusion of Traditional Custodian perspectives in the management plan. This is a constructive and collaborative step, and the Council offers its full support.

Strengthening transparent communication is also vital, as it builds trust between the public and conservation authorities. To reinforce this trust, the Council recommends incorporating clear, evidence-based documentation of the impacts caused by kangaroo overabundance on other native species and ecosystems. For example, aerial photographs of degraded grasslands similar to methodologies used in studies on feral hog impacts in Texas would offer compelling visual evidence and help stakeholders, including animal welfare groups opposed to culling, better understand the severity of the issue.

The Council discourages the proposed change to shooter competency testing intervals, increasing the requirement from two years to three years. A shorter testing cycle would help ensure that shooters maintain the necessary skills for accurate and humane culling. The draft notes that all Buru shooters must complete both the competency test and the macropod-specific assessment; however, it is unclear whether this requirement also applies to private landholders or leaseholders who may be authorized by the Conservator to undertake culling on their properties.

For transparency and to uphold animal welfare standards, the Council strongly recommends that any private landholder or leaseholder involved in culling activities be required to complete the same formal competency and macropod shooting assessments as government-contracted shooters. The Nature Conservation's Public Consultation draft on Buru Management Plan states that authorisation on other lands will be considered on a case-by-case basis, but further explanation of how these decisions are made would improve clarity and public confidence in the process.

The draft has also repeatedly referenced the term "safe operating environment," focusing largely on vegetation height and visibility. However, the term itself may be unclear or misleading to the broader community. It is not obvious whether the "safe operating environment" refers to the absence of humans, the avoidance of harm to non-target species, the risks of shooting in tall grass, or all of these factors. A more precise and transparent explanation would improve public understanding. The Council suggests using terminology that better reflects ecological context, for example, "ecologically appropriate operating conditions" to avoid confusion and ensure consistent interpretation.

The Council partially supports the Management Plan's position of not introducing natural predators but believes that the rationale for low predicted success should be explained in greater detail. The Council also notes that, from a long-term ecological perspective, the

reintroduction of natural predators such as dingoes may provide a more sustainable and less interventionist population control approach and encourages further evaluation of this strategy.

The Council supports the Management Plan's strategy on vegetation manipulation, the scientific evidence clearly suggests that manipulation will, in the long term, discourage kangaroo occupancy in manipulated areas, thereby supporting the Management Plan's ecological objectives.

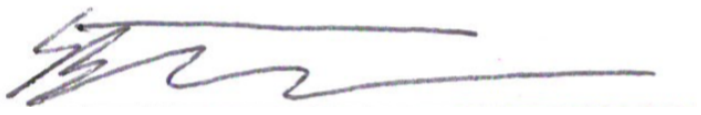
The Council also supports the previous decision of Kangaroo Management Plan not to pursue water-access restriction as a management tool, given its limited effectiveness.

- The Council continues to support ecological culling conducted according to the National Code of Practice and ACT animal welfare standards.
- The Council recommends improvements in survey transparency and methodological rigor, including the continued direct or walk counts and integration of climate forecasts and soil analysis.
- The Council supports avoiding contracting inexperienced shooters for culling, as this can reduce shooting accuracy and increase the risk of inhumane outcomes.
- The Council continues to support integration of habitat protection measures, such as fencing in sensitive sites, to complement population management.
- The Council supports ongoing research into fertility control methods like GonaCon, including assessment of long-term efficacy and ecological impacts.
- The Council recommends ongoing consideration of predator reintroduction, such as dingoes, to naturally regulate kangaroo numbers and restore ecosystem function.
- The Council supports continued clear communication with the public to promote understanding of the ecological, economic, and social justifications of management actions.

Public trust depends on transparency and evidence-based practice. By combining science, welfare standards, and open communication, the ACT can ensure that kangaroo management supports both biodiversity conservation and community values.

We at the Conservation Council ACT Region appreciate the opportunity to share our genuine concerns regarding animal welfare and the humane treatment of wildlife in the ACT. We also welcome the opportunity to participate in any future consultations related to the Buru "Eastern Grey Kangaroo" Management Plan.

Signed,



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