

28 June 2021

Dr Deborah Peterson  
Chair  
Wildlife Act Review Expert Advisory Panel  
  
via email: [wildlifeactreview@delwp.vic.gov.au](mailto:wildlifeactreview@delwp.vic.gov.au)

Dear Dr Peterson and Fellow Panel Members

### **Independent Review of the *Wildlife Act 1975* (Vic)**

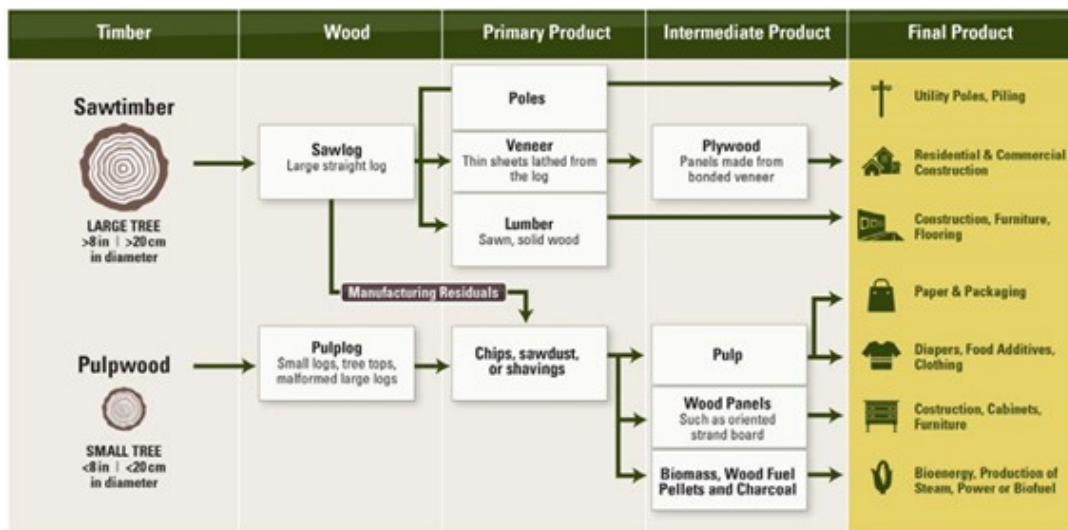
The Victorian Forest Products Association (VFPA) welcomes the opportunity to provide a submission to the Independent Review of the *Wildlife Act 1975* (the "Act") and notes that this discussion paper is a first step in a lengthy process to review the Act.

The VFPA notes that one of the major triggers for the review was the February 2020 Cape Bridgewater incident that resulted in a significant number of koala deaths, along with injured and starving koalas. This incident sparked considerable community outrage with the finger originally pointed at the forestry sector. However, the incident occurred following the harvest of plantation timber on private land and the formal hand over from the harvesters to the land owner. As the investigation is ongoing and prosecution is yet to occur, VFPA will not comment further. However, VFPA puts on the record that it does not condone deliberate acts of cruelty.

The Victorian forest products industry incorporates the production of timber from native and plantation (Tasmanian blue gum and *Pinus radiata*) forests, along with the primary and secondary processing. Primary processing includes both saw logs (normally tree diameter greater than 22 cm) and pulpwood for chipping and for paper/pulp. **Figure 1** on the following page shows the wood flow - and while this is sourced from North America, the flow is similar in Australia.

As reported by members, the major intersection between wildlife (both native and introduced species) and the forestry sector occurs at the production end of the value chain. VFPA makes the following points in relation to forestry and wildlife:

Figure 1 Forestry wood flows



- While 82% of public land has forest cover, 10% of the private land estate also has forest cover – totalling some 1.5 million ha. Private land forests are either conservation or multiple use and as such are important tools to build resilience and connectivity across the landscape.
- Public and private forest owners and managers in Victoria provide and actively manage significant areas of wildlife habitat in both production forests, and in areas reserved from production. Several plantation companies are involved with habitat restoration and other works to improve outcomes for wildlife on their own and with other land owners.
- Victoria's forestry operations are impacted by feral animals (particularly deer and feral pigs) and overabundant native animals such as wallabies and kangaroos. Annually the industry plants 20-30 million trees and some plantations report that 30% of seedlings at five years of age show signs of feral deer impacts that have either killed the seedling or made the seedling unsuitable for higher value uses at harvest.
- The economic impact of wildlife on forestry operations is mentioned on page 5 (scope of review) as part of the Panel's considerations. However the remainder of the discussion paper is largely silent on this aspect. The economic impact will include lost production along with the management and control of wildlife.
- Koalas have adapted their gut biology to prefer Tasmanian blue gums and are now overabundant in many blue gum plantations in Victoria. This requires management to ensure harvest operations are undertaken in accordance with the legal requirements such as excluding habitat trees from harvest. Plantation companies are also required to seek veterinary assistance for koalas that may be injured in circumstances unrelated to silvicultural activities (e.g. fighting,

falling from trees etc). It is estimated that the Victorian plantation industry spends more than \$10M per annum on koala protection measures during harvesting operations

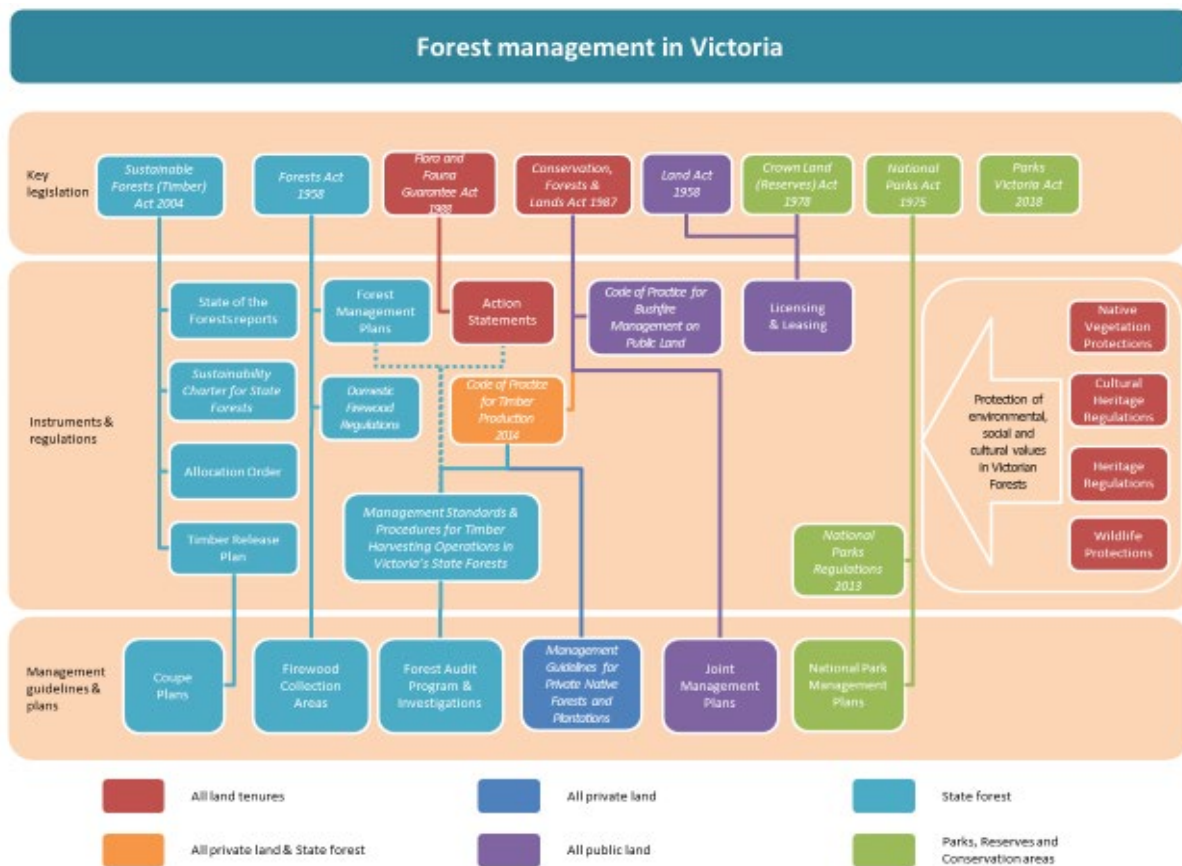
In addition to the Wildlife and other acts described in the discussion paper, Victorian forestry is subject to a significant regulatory burden, which is set out in Figure 2 below and Figure 3 on the following page.

**Figure 2 Victoria's public forest management system – high level responsibilities<sup>1</sup>**

	Minister for Energy, Environment & Climate Change		Minister for Water	Minister for Agriculture	
Agency / Authority	DELWP	Parks Victoria	DELWP / Melbourne Water / CMAs	DJPR	VicForests
Key legislation	<ul style="list-style-type: none"> <li>Forests Act 1958</li> <li>Land Act 1958</li> <li>Crown Land (Reserves) Act 1978</li> <li>Conservation Forests and Lands Act 1987</li> <li>Flora and Fauna Guarantee Act 1988</li> <li>Sustainable Forests (Timber) Act 2004</li> <li>Wildlife Act 1975</li> </ul>	<ul style="list-style-type: none"> <li>National Parks Act 1975</li> <li>Crown Land (Reserves) Act 1978</li> <li>Parks Victoria Act 2018</li> <li>Wildlife Act 1975</li> </ul>	<ul style="list-style-type: none"> <li>Water Act 1989</li> </ul>	<ul style="list-style-type: none"> <li>Sustainable Forests (Timber) Act 2004</li> </ul>	<ul style="list-style-type: none"> <li>Sustainable Forests (Timber) Act 2004</li> </ul>
Key forest management responsibilities	<ul style="list-style-type: none"> <li>Establish Forest Management Plans</li> <li>Administer Forest Zoning Scheme in State Forests</li> <li>RFA implementation</li> <li>Regulate timber harvesting</li> <li>Action Statements for threatened species</li> <li>Forest fire management</li> <li>Prepare State of the Forests report</li> </ul>	<ul style="list-style-type: none"> <li>Manage parks and reserves and ensure they are healthy and resilient for current and future generations</li> <li>Contribute to forest fire management in proximity to parks</li> </ul>	<ul style="list-style-type: none"> <li>Manage water resources within Melbourne's designated water catchments</li> <li>Contribute to forest fire management in proximity to catchments</li> </ul>	<ul style="list-style-type: none"> <li>Advice to Government on forest policy settings</li> <li>Approve Allocation Order to VicForests</li> <li>Oversee VicForests' development of Timber Release Plans</li> </ul>	<ul style="list-style-type: none"> <li>Harvest, regrowing and commercial sale of timber from public native forests</li> <li>Manage operations in accordance with Allocation Order under Sustainable Forests (Timber) Act 2004</li> <li>Develop Timber Release Plans for stakeholder review</li> <li>Develop Timber Utilisation Plans for areas outside Allocation Order</li> </ul>

<sup>1</sup> 2019 Overview of Victoria's Forest Management Systems

*Figure 3 High level policy, planning and regulatory framework for forest management<sup>2</sup>*



VFPA's responses to specific sections of the discussion paper are set out below.

What should the Act do?

Clearly community attitudes to wildlife have changed since the Act was introduced in 1975, and much of this has been driven by the agendas of environmental activism that has also grown since 1975. An outcome has been the rise in conflicts between the interests and expectations of the various stakeholders. For primary industries like the forestry sector, this plays out in litigation, lobbying of government, complaints to the Office of Conservation Regulator (OCR), impacts on harvesting operations to incorporate management of overabundant koalas in plantations, and direct action around the native forestry coupes. The latter places the safety, and indeed lives, of both forestry workers and activists at risk.

As complaints to the OCR are largely unfounded<sup>3</sup> on investigation, activism is also playing out in other policy areas such as native forestry's purported impacts to

<sup>2</sup> Ibid

<sup>3</sup> Minor infringements by VicForests are technical in nature. See the OCR response tabled by VicForests at the Federal Senate Inquiry into Senator McKenzie's EPBC Act Amendment Bill [Additional Documents – Parliament of Australia \(aph.gov.au\)](http://aph.gov.au)

Melbourne's water supplies. However, incidents like Cape Bridgewater are also immediately blamed on the forestry sector when an investigation remains ongoing, and plantation harvesting operations had formally handed the property back to the landowner four months previously. As an example, the initial report in February 2020 blamed the plantation sector<sup>4 5</sup> and continues a year later<sup>6</sup>. The Humane Society International Australia (HISA) and Environmental Justice Australia (EJA) Failing Our Wildlife report also blames the plantation forestry sector with the report stating "*significant community concern at the killing of koalas following timber harvesting at Cape Bridgewater*"<sup>7</sup>. In fact the forestry industry could be forgiven for viewing this review somewhat guardedly given the many parallels between the HISA/EJA report and this review.

All that said, the review of the Act should also consider the following opportunities:

- Overabundant native species impact agriculture and forestry - and impact on other native species as well as their own species. Examples such as overabundant kangaroos, wallabies and koalas can result in poor environmental outcomes, poor wildlife outcomes and reduced agricultural and forestry production or its destruction (e.g. tree seedlings). The inclusion of opportunities to better manage overabundant native species is critical. Item 4.2.1 in the issues paper refers to the use of science based expert advice, and VFPA would welcome a science-based approach to the application of protected and unprotected status to reflect species abundance.
- Opportunities to translocate overabundant native species such as koalas to regions where the species is under pressure e.g. koalas in Victoria's south west blue gum plantations to northern NSW. This has been done before (to Kangaroo Island) and should be encouraged as a legitimate management option.
- The monitoring of wildlife on the public land estate is deplorable - we do not know what we do not know. Some of the angst around native forestry coupes is that there is significant survey of these coupes ahead of harvest and as a result there is excellent knowledge of what species inhabit these coupes for foraging or other purposes. The same cannot be said for most of the public land estate. A significant effort is required to better understand what wildlife species inhabit our public land estate and their distribution across this landscape. The use of innovation such as the technology currently being used overseas in areas such as NASA or defence technologies should be explored.

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<sup>4</sup> [Dead Victorian koalas at Cape Bridgewater spark investigation | 7NEWS.com.au](https://www.7news.com.au/news/2020/02/20/dead-victorian-koalas-at-cape-bridgewater-spark-investigation/)

<sup>5</sup> [Koalas allegedly killed in 'massacre' on private logging plantation in Victoria | 7NEWS.com.au](https://www.7news.com.au/news/2020/02/20/koalas-allegedly-killed-in-massacre-on-private-logging-plantation-in-victoria/)

<sup>6</sup> [Report calls for reform of the Wildlife Act | The Standard | Warrnambool, VIC](https://www.thestandard.com.au/news/2021/02/20/report-calls-for-reform-of-the-wildlife-act/)

<sup>7</sup> [EJA\\_HSI\\_Failing\\_our\\_wildlife-3.pdf \(envirojustice.org.au\)](https://www.envirojustice.org.au/wp-content/uploads/2021/02/EJA_HSI_Failing_our_wildlife-3.pdf), page 5

- Feral animals (introduced species) are variously protected, hunted or are to be controlled under three different statutes. Feral animals impact native species through either destruction of the plants on which Victoria's native species depend or through the introduction of diseases, and moreover, impact Victoria's agriculture and forestry sectors. Victoria has Australia's largest feral deer population. Excluding feral animals from the protections under the Wildlife Act would reduce this complexity to two statutes. Moreover, recommending a significant increase in the penalties for translocation of feral animals would deter this pastime of some in the hunting fraternity.
- VFPA supports clarity that the review should safeguard the welfare of species rather than individual animal protection.
- Innovative R&D into systems management for the public land estate, including traditional owner methods and commercial models. Such approaches may also find new income sources that can improve budgets and provide wider benefits.

Clearly managing wildlife populations across different land tenures and jurisdictions is challenging - particularly for the management and control of feral animals. As mentioned above, opportunities to translocate locally overabundant native species should be explored, while feral animals should be excluded from protections under the Act to reduce statute complexity and to facilitate lethal control options.

A study (CSIRO, 2019) analysing the biggest threats to wildlife listed under the Federal *Environment Protection and Biodiversity Conservation Act 1990* (the "EPBC Act") shows that invasive species is the major threat, impacting 82% of listed species followed by natural ecosystem modifications (e.g. fire and fire suppression, dams, and water use,) which impact 74% of listed species. Timber production is included within agriculture (impacting 57% of native species) however, timber production is far outweighed by agriculture and livestock grazing as the significant threats in this category. The report shows that the ranking is largely consistent across species. The research states that this work is significantly different from recent analyses globally, which lists overexploitation, agriculture, and urban development as the major causes of decline (CSIRO, 2019).

The CSIRO work also shows that 37 problematic native species (20 native animals, 16 plants and one pathogen) are listed as threats for one-fifth of threatened species, particularly grazing pressure from macropods.

Other research (Taylor-Brown, et al., 2019) investigated anthropogenic threats facing native fauna, and specifically wildlife admissions to Australia Zoo. Car strikes were the most common reason for admission (34.7%), with dog attacks (9.2%), entanglements (7.2%), and cat attacks (5.3%) also high. Admissions of orphaned young and overt signs of disease were significant at 24.6% and 9.7%, respectively. Mortality rates were



highest following dog attacks (72.7%) and car strikes (69.1%) and lowest in orphaned animals (22.1%).

These two reports shows that unless the reform of Victoria's Wildlife Act facilitates significant investment in managing invasive species and overabundant native species, deals with how transport intersects with wildlife (e.g., through mechanical separation and wildlife movement corridors), and places an obligation on pet owners, native wildlife will continue to be impacted.

### Interaction with other legislation

The discussion paper notes that there may be indirect threats to wildlife such as habitat destruction and seeks views on whether this should be covered by the Act.

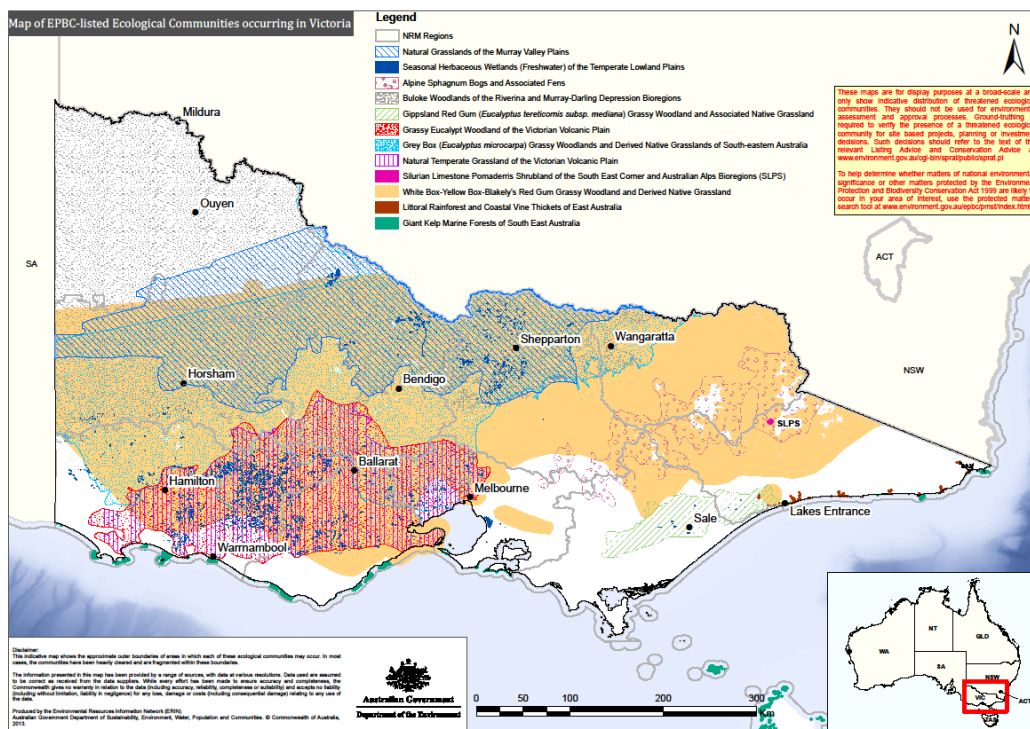
Including habitat in the Wildlife Act will result in additional complexity, confusion, cost, and green tape. There are numerous other statutes, policies and strategies that specifically deal with habitat such as the *National Parks Act 1975*, *Forests Act 1958*, *the Catchment and Land Protection Act 1994*, *the Conservations, Forests and Lands Act 1987*, *the Planning and Environment Act 1987* and strategies such as Victoria's Biodiversity and Koala Strategies. In addition, there are significant existing obligations on landowners and the broader community through planning requirements and guidelines such as the *Guidelines for the removal, destruction or lopping of native vegetation*. There are also protections under the EPBC Act for threatened ecological communities that cover much of Victoria (Figure 4 on the following page). Likewise the *Victorian Flora and Fauna Guarantee Act 1988* provides protections for threatened species, critical habitat, and habitat conservation orders.

Victoria's public land conservation estate is the means to preserve and protect both habitat and wildlife, along with the obligations of various land tenures such as private land through these other legislative mechanisms. Public land in Victoria covers one third of the state – nearly 8 million hectares – and as stated above, 1.5 million ha of private land has forest cover.

It is arguable whether the state of wildlife within the public land estate is known – or managed – well. It is impossible to manage what is not known. As an example, the legal obligations place on VicForests ensures that areas of forest to be harvested are well surveyed. Surveys of native forest coupes have located 1000 colonies of the EPBC Act listed critically endangered Leadbeater's Possum – this should not be surprising as trees of 20-30 years of age with acacia understorey are their preferred forage habitat. Little wonder a significant number of possum colonies have been found when it was presumed extinct.

In blue gum plantations, trees in which koalas are located, along with additional habitat trees, are excluded from harvest.

Figure 4 EPBC Act Threatened Ecological Communities in Victoria



### The Treatment of Wildlife as Property

The discussion paper notes that wildlife is the property of the crown, with this ownership ceasing when wildlife is taken under licence (the property is transferred to the non-state owner under highly regulated circumstances). Across Victoria, two thirds of the land is privately owned. This ownership comes with obligations to manage the landscape for private use (notable production) along with the broader public's expectations regarding soil, water and flora and fauna. Private landholders provide ecosystem services on behalf of the broader Victorian community. Yet much of these ecosystem services are privately funded – along with the costs of managing invasive and overabundant native species.

The agricultural sector has been more forthcoming in the recognition of the ecosystem services provided by “*natural capital assets [including] the regulation of disease, floods and droughts, provision of food sources, and cultural services*”<sup>8</sup>. The National Farmers' Federation (NFF) and its members has long championed payments to farmers for these ecosystem services, and in recognition of the private costs for stewardship of these public benefits. While the agriculture sector has been particularly strident in developing and responding to stewardship opportunities, the forestry sector has been left far behind.

<sup>8</sup> [Natural Capital – National Farmers' Federation \(nff.org.au\)](http://nff.org.au)



Any Wildlife Act review needs to recognise the value of these services and consider establishing a robust ecosystem services market for private landholders for the provision of these natural capital services for, and on behalf of, the wider community.

Like the precautionary principle, discussions around recognising the sentience of animals brings concerns. This can be summarised as the “competing values, and different prioritisations of values create ethical dilemmas and disagreements” (Gamborg, Palmer , & Sandoe, 2012). The wise use of wild animals versus the preservationist view to protect pristine nature with as little anthropogenic interference as possible that give rise to conflict (Gamborg, Palmer , & Sandoe, 2012). Without a doubt, recognition of sentience in legislation and supporting government policies, strategies and programs is on the rise globally.

The concern of private landholders, including forestry, is the notion that animal rights groups support the notion of sentience to constrain the management and control of invasive and overabundant native species. One only needs to look at the campaigns<sup>9</sup> <sup>10</sup> and litigation<sup>11</sup> by environmental NGOs around the ACT Government’s annual kangaroo culls as an example.

The inclusion of the recognition of sentience in a new Wildlife Act cannot occur in isolation. There also needs to be recognition of the need to manage and control wildlife for several reasons, including supporting the humane destruction of animals were required. This obviously needs to consider compassion about animal welfare and an investment in humane destruction options. The last issue the forestry sector needs are difficult precedents that severely constrain the management and control of feral animals and overabundant native species.

### *The Precautionary Principle*

Environmentalists have long championed the precautionary principle as a prohibition of action (Peterson, 2006) while yet others such as developers and arguably the primary industries sector are more inclined to look to adaptive management such as options to avoid, minimize and if unavoidable, what offsets may be warranted. It is crucial that new legislation can demonstrably deliver continuous improvement in outcomes for wildlife.

The inclusion of the precautionary principle in legislation without clearly outlining what this means – and having a clear community understanding of the meaning – is a recipe for more green litigation. Improving our native wildlife should be an exercise in continuous improvement over time supported by monitoring of the health of the public land estate given this is Victoria’s most significant wildlife asset. At present there is no baseline for this asset.

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<sup>9</sup> [Stop the slaughter of kangaroos in ACT \(animalsaustralia.org\)](https://www.animalsaustralia.org/stop-the-slaughter-of-kangaroos-in-act)

<sup>10</sup> [Chris Klootwijk found guilty of disrupting kangaroo cull in Canberra - ABC News](https://www.abc.net.au/news/2023-05-10/chris-klootwijk-found-guilty-of-disrupting-kangaroo-cull-in-canberra/10411114)

<sup>11</sup> [ACT kangaroo cull on hold for court action - ABC News](https://www.abc.net.au/news/2023-05-10/act-kangaroo-cull-on-hold-for-court-action/10411114)

## Permissions Framework and Cost Recovery

The VFPA supports a framework that is clear, transparent, and accountable with respect to permits, licences, and authorisations. However, VFPA's main comment with respect to this section regards to the following comment:

*“Licences and authorisations can also impose a burden on the regulated party that is sometimes not commensurate with the risk of the activity being conducted.”*

Cost recovery will largely fall into one of the following categories:

- 'Regulatory fees' are characterised by granting access rights to engage in a desired activity, e.g. a permit or licence enabling the Government to regulate an activity.
- A 'user charge' or 'fee for service' is the direct charge for the provision of a good or service, e.g. the charge of processing a Freedom of Information request.
- 'Levies' are a form of tax that is imposed on a specific industry or class of persons.

The first two fees are likely to apply to new Wildlife legislation. Moreover, the principles of cost recovery must apply, and any such charges should:

- *be set according to an 'efficient' cost base*: best practice cost recovery arrangements require that charges be set at a level that recover the 'efficient' (i.e. minimum) costs of providing the good/service at the required quality, or of undertaking the necessary regulatory activity.
- *not be used to finance/achieve unrelated activities/objectives*: cross subsidies should be avoided because they are inequitable and often create incentive effects that are contrary to the desired efficiency objectives.
- *avoid volatility*: a framework of cost recovery charges that smooth year on year fluctuations will facilitate the forward planning processes of government, enterprises, and industries; and
- *be simple to understand*: complex arrangements that are theoretically pure may introduce unjustified costs and unnecessary confusion. (Department of Treasury and Finance, 2013)

The above points from the Department of Treasury and Finance would appear at odds with the discussion paper's comment about recovering costs commensurate with risk of the activity. A good cost recovery framework shows a clear link between the regulator's efficient cost (e.g. issuing a licence) and the activity itself.

More importantly, the application of fees must be considered in the context of the significant existing costs borne by private and government owned enterprises in the forest sector protecting wildlife. It is estimated that the Victorian plantation industry spends more than \$10M per annum on koala protection measures alone during harvesting.

Moreover, governments generally are operating in a market environment where competitive neutrality is not normally present – and overall are a high cost for service delivery. These considerations also require that any charges must undergo a public consultation process and regulatory impact statement process. The VFPA also notes that some costs are not recoverable, e.g. Ministerial office and policy development.

VFPA supports that any fees recovered must be applied to offset the cost base for which these are collected, i.e. fees should not be directed to central revenue.

That said, wildlife regulation is the responsibility of the Victorian Government. As such, it is the Victorian Government's responsibility to provide sufficient resources to undertake the functions outlined in its regulatory frameworks. The Victorian Government should not seek higher charges to recoup its responsibilities beyond what is required for the efficient cost of undertaking the activity such as the issue of licences (i.e. unrelated costs should be precluded from the cost base).

The discussion paper points to expanded reporting requirements in a new Wildlife Act. However, the discussion paper was not clear on what the obligations might be for private organisations. The plantation sector is already involved with significant obligations in relation to koalas. Any new reporting requirements must balance the objective of wildlife management without creating additional costs, regulation, and bureaucracy.

### *Incorporating Independent Expert Advice in Decision Making*

The VFPA supports the inclusion of advisory bodies to assist decision making. However, the appointment of individual experts needs careful consideration. Experts should be required to show their independence. As an example is the Dr Peter Ridd case currently before the High Court. Dr Ridd was fired by James Cook University in 2018 for breaching the university's code of conduct for criticising his colleagues' research on the impacts of climate change on the Great Barrier Reef despite Dr Ridd's comments being his area of expertise<sup>12</sup>. Dr Ridd's situation calls out the fact that scientists may be prone to bias. More recently the University of Tasmania undertook an investigation of research misconduct that resulted in the researchers retracting their paper<sup>13</sup>. There are other examples relative to Victoria. How a legislative

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<sup>12</sup> <https://www.abc.net.au/news/2020-07-30/peter-ridd-donations-sacking-james-cook-university-high-court/12506230>

<sup>13</sup> <https://www.theguardian.com/environment/2021/mar/01/university-of-tasmania-clears-scientists-accused-of-research-misconduct-by-logging-industry>

instrument is constructed to ensure the independence of the experts is key to assisting decision makers making such appointments.

### Third-Party Civil Enforcement

The VFPA does not support third-party civil enforcement provisions. The responsibility for the Wildlife Act is the Victorian Government, including monitoring and enforcement. The Office of Conservation Regulator (OCR) has a role of independent investigation. The increase in complaints against the forestry industry to the OCR shows a significant effort is required for environmental NGOs to better understand the powers and role of the OCR. The fact that numerous complaints have been tabled, investigated, and dismissed is notable. To allow third party civil enforcement will lead to untenable impacts to legally operating businesses through significant green litigation that will be unacceptable to the forestry and other industries in Victoria.

And finally, it is notable that the Panel does not include a member representing the interests of private landholders, particularly given that around two thirds of Victoria's land area is held privately, and these landowners are also important for wildlife management on their land. The appointment of representatives from the agriculture or forestry sectors would have been welcome.

I look forward to engaging through the review of the Wildlife Act.

Yours sincerely



Deb Kerr  
CEO

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