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Independent Review Panel - Victorian Wildlife Act (1975)
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Submission: Independent review of Wildlife Act 1975 (Victoria)

Introduction

Thank you for the opportunity to comment on this important review.

We are affected by many elements of the Act and hope that our submission will be considered to make much-needed improvements to it to provide greater protection for Victoria's native wildlife.

About us

Wildlife Advocates Nillumbik is a community organisation that works to improve the safety and protection of native wildlife.

Our organisation includes members with specialist knowledge of wildlife rescue, wildlife care, treatment of infectious wildlife diseases, impacts of habitat loss and impacts of climate change.

Most of our members live in semi-rural areas of two to 100 acres, in the Green Wedge shire of Nillumbik, where we are fortunate to still live amongst native wildlife. This includes the Brush-tailed Phascogale and Greater Glider, both of whom are listed as threatened under the Flora and Fauna Guarantee Act 1988.

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Scope of review

Summary

We believe the Act, as it currently stands, fails to:

- have appropriate objectives and scope
- establish best-practice regulatory framework
- recognise or protect the right and interests of traditional owners and indigenous people
- deter individuals, corporations and government departments from committing wildlife crime.

Biodiversity

Introduction

As it stands, the Wildlife Act is mainly a mechanism for killing – not protecting – wildlife.

It fails in all of the aspects the panel will be considering during the inquiry.

In light of ongoing habitat loss and destruction in Victoria, the Act needs to be revised to take a whole ecosystem approach, based on science.

Recommendation

Revise the principle objectives of the Act to be the:

- protection, conservation and welfare of all native animals, including through effective and strategic protection of their habitat
- recognition of the importance of native animals to indigenous people.

Adopt a whole ecosystem approach.

Introduce requirements for wildlife to be treated humanely. This would naturally prohibit the:

- bludgeoning of kangaroo joeys
- shooting of kangaroos other than with a clean shot to the brain
- use of 1080 and PAPP
- use of leg hold traps
- shooting of native waterbirds via a 'duck shooting season'.

Need for independent regulator

Introduction Currently, there is no independent regulation of the Act. The Office of the Conservation Regulator comes under DELWP.

Recommendation Develop an independent statutory authority that is responsible for wildlife management eg a Biodiversity Commission.

Amongst their responsibilities, include setting policy, making decisions, ensuring compliance, enforcing compliance, prosecuting breaches.

ACTW permit system

Introduction

The ACTW permit system is one of the more concerning elements of the Wildlife Act.

Anyone can apply for a permit and not be required to provide any evidence of 'harm' being done by wildlife.

In addition, neighbours who will be personally affected by wildlife killing are not given any opportunity to comment on the application.

The fact that permits have been issued to kill threatened species highlights how flawed the permit system is.

Lack of rigour

Currently, applicants are not required to provide any actual evidence of wildlife having an adverse impact on them.

Kangaroo counts are non-existent. The "Authority ..." claims that there is an overpopulation of kangaroos. One of our members phoned DELWP themselves and had a conversation about this. When they asked for the data, the officer confirmed there was only one count in 2018 and was never repeated. Current research on kangaroo counting methods are very clear: one count does not work due to the volatile nature of the species. That means we have NO CURRENT counts in Victoria. It is really concerning that our own government misuses research.

The application process is, essentially, a 'tick and flick' exercise, which can be approved within 48 hours, based solely on one person's opinions and wants.

There is a myth that Kangaroos cause \$90 million damage to crops, fences and equipment. This myth is common but little research has been done to prove or disprove this myth. "Indeed, there is little convincing evidence of substantial damage by kangaroos to crops, pastoral production or rangelands, except in a few localized areas." (Penny Olsen & Tim Low, 2006).

"Kangaroos generally keep within 100 m or so of the bush that they use for shelter, so crop damage is usually restricted to this zone of the paddock. Measurements were made of crop losses from kangaroos in crops bordering the Tutanning Reserve near Pingelly. These averaged 1 to 2 per cent of paddock yield. Similar results were obtained for crops around the Durakoppin Reserve at Kellerberrin. In some situations, losses will be higher, but more than 95 per cent of crops in the wheatbelt are never visited by kangaroos." (Dr Graham Arnold, 1990)

"Pests is an emotive word. It conjures up visions of animals destroying crops. I can think of no situations where this is likely to be true for kangaroos." (Dr Graham Arnold, CSIRO)

"Sometimes damage is attributed to kangaroos but the real perpetrator is another animal or even insects. In the Kinchega area, the NSW NPWS first thought that damage to vegetation during the 1982-83 drought was caused by kangaroos, but further investigation indicated that pasture insects were responsible. The Queensland NPWS has also drawn attention

to the role of native insects, particularly termites, in pasture losses. Other animals such as pigs, mice, rabbits, hares, donkeys, goats, wombats and emus may also be responsible for damage to pasture.” (Senate Select Committee on Animal Welfare, 1988)

We see many cases of community uproar when there are culls or cases of animal cruelty, the latest example is the Heritage Golf Club and the Kinley case. In both instances, the general public, rescuers, vets and the media have come together and proposed solutions to the issues with those animals. DELWP has failed to protect them, too. The Wildlife Act should regulate these instances and provide clear guidelines about protection for animals and hearing the community. There was a working group of professionals, vets and rescuers that put a lot of work and submitted a proposal to DELWP with a solution, completely self-funded. It was rejected on unfounded grounds, claiming relocation doesn't work. There is no scientific basis for such claim. One of our members, who is also a researcher, expressed their frustration to see how facts are 'invented' to suit an agenda. As a shelter operator, two of our members have relocated kangaroos and they assure it works, as many other shelters can prove. They have soft-released animals coming from other areas and they are still around their property. The Wildlife Act should ensure that wildlife carers' experience is taken into account, those shelters and the researchers should be working together.

Recommendation

We ask that the permit system be revised so that:

- strict and transparent criteria for approving permits are developed and made readily available to the public; any 'damage' by native wildlife must be significant for a permit to be issued
- permits are considered to be a last resort
- applicants are required to submit a count of the animals to whom the permit relates, conducted by an independent and suitably qualified scientist using best practice methods
- any claimed 'damage' is assessed and quantified by an independent and suitably qualified and experienced individual or organisation, using best practice methods
- applicants must use, and provide evidence that they have used, the currently-accepted most effective non-lethal methods (eg bird scaring devices) using best practice approaches
- people and communities who will be affected if a permit is issued are notified of the application in a suitably public way, and given an opportunity to comment, similar to how residents can comment on planning applications
- decisions are based on available science and can include citizen science
- any permit applications are reviewed by the same ethics committee that reviews applications to conduct research that will benefit wildlife
- when permits are issued, wildlife monitoring must be paid for by the permit applicant, and conducted using a suitably qualified and independent individual or organisation, using best practice methods
- performance audits of the permit system are conducted every year

Compliance and enforcement

Introduction

Under the current Act, enforcement of compliance is virtually non-existent. Consequences for breaching the Act are minimal and insufficient in deterring illegal activity.

This has been seen time and again, most recently with the poisoning of the Wedge-tailed Eagles and other raptors in East Gippsland, and the koala massacre in Portland.

In our own locality we watch the massacre of kangaroos at the heritage Golf Club, the destruction of greater Glider habitat in Kinglake, the illegal killing of wildlife on private property that we are unable to prevent even with evidence. We are dealing with Council, State Government members, private land owners, but there is no consistent approach or jurisdiction we can go to.

Recommendation

- Significantly increase penalties and consequences so that individuals, corporations and government departments are deterred from committing crimes against wildlife and ecosystems
- Include civil and criminal penalties and enforcement orders
- For corporations, such as the perpetrator of the Portland koala massacre and VicForests, issue fines as large as any financial gain they make from harming wildlife
- Implement systems to ensure payment of fines (VicForests is particularly tardy in paying for legal costs of community organisations that have successfully sued them)
- Include enforceable orders that may reduce recidivism more than financial penalties or jail
- Allow evidence submitted by individuals to be admissible eg videos, photos
- Allow any third party person or organisation to apply to court where there are alleged breaches, either civil or criminal.

Logging and burning of native forests

Introduction

Currently, the impact of native forest logging and burning on wildlife is not included in the Act.

Given that habitat loss is the key threatening process for most Victorian wildlife, we ask that this be rectified and that the impacts of logging and burning on native wildlife are reduced, using provisions in the Act. Many threatened species rely on the unique resources of wet and damp forests, including the Greater Glider, Yellow Bellied Glider, Leadbeater's Possum, Sooty Owl, Smoky Mouse, and Spotted-tail Quoll. The current Act provides no direct protection for wildlife habitat, and the regulations give exemptions to the logging industry through the Regional Forest Agreements, RFA's.

Logging is happening in Kinglake, which is part of our shire, and in neighbouring Toolangi. This is despite the documented presence of the threatened Greater Glider. Many of our local community campaign against this destruction. Including taking legal action to try and prevent the destruction.

Recommendation

- Remove exemptions for the destruction, degradation and damage to native wildlife habitat from native forest logging, which is currently permitted via Regional Forest Agreements
- In the Act, mandate that no person, corporation or government department can damage, disturb or destroy any wildlife habitat
- Based on the 'whole ecosystem protection' approach, introduce 'wildlife protection zones' and 'wildlife protection orders'
- Require physical wildlife surveys, rather than computer modelling, before any logging or 'fuel reduction burning' can be done. Many times, surveys by community groups have identified the presence of threatened species which government departments had not identified
- We need clear laws that prohibit damaging, disturbing or destroying wildlife habitat, and native timber harvesting operations should be held accountable to these laws.

References: The [Victorian Scientific Advisory Committee](#) has advised the Government that "Wood production practices are known to substantially deplete Greater Glider populations and gliders usually die if all or most of their home range is intensively logged or cleared (Menkhorst op. cit.)." Studies by [Lindenmayer et al, 2010](#) have shown an "annual decline of sites occupied by the Greater Glider in the Central Highlands averaging 8.8% per year in the period 1987 to 2010. This decline was attributed to logging practices, lower rainfall, and fire. In regards to the impact of logging; "We also found that the probability of observing the Greater Glider was significantly ($v_2 = 9.40$, d.f. = 1, $P = 0.002$) higher on our sites located in the Yarra Ranges National Park than in forests broadly designated for pulp and timber production. We identified a significant positive relationship between the abundance of the Greater Glider and both the age of the

forest and the numbers of trees with hollows on a site (Wald statistic, $v_2 = 1 \frac{1}{4}$, $P = 0.039$).". .."Clear-cut logging, as indicated by both the absence of the species in forests that have been logged and regenerated in the past 35 years (Lindenmayer, 2009a) and relationships between the occurrence of the species and the significant reduction in abundance of large trees with hollows which are traditionally removed by timber harvesting operations (Lindenmayer et al., in press).

The [THREATENED SPECIES SCIENTIFIC COMMITTEE](#) advised the Federal government on the listing of the Greater Glider as threatened: The Minister approved this conservation advice on 02/05/2016 and included this species in the Vulnerable category,. The advice was that " Over the period 1997–2010, the greater glider declined by an average of 8.8 percent per year (a rate that if extrapolated over the 22 year period relevant to this assessment is 87 percent) (Lindenmayer et al., 2011). Higher rates of decline were recorded in forests subject to logging than in conservation reserves, and declines were also associated with major bushfires and lower-than-average rainfall. More recent surveys undertaken by Lumsden et al. (2013, p. 3) stated: 'A striking result from these surveys was the scarcity of the Greater Glider which was, until recently, common across the Central Highlands'.

Examples of where the Act is failing animals

Kangaroos

Introduction

We believe that all native wildlife should be protected under the Wildlife Act.

That the state government could allow kangaroos to be killed for profit, in most parts of Victoria, under the Act, has been a shock to many people.

It was particularly shocking as the government's own inquiry advised against allowing kangaroos to be killed for food.

This decision directly affects us.

Most people in our area live here because they want to be amongst nature and wildlife.

Kangaroos in our areas are now being killed. We are concerned that there will be regional extinctions, both in our area and throughout much of Victoria.

Slow breeding, high mortality

A plague is biologically impossible because kangaroos are slow-growing with low reproductive rates and normal 73% juvenile mortality rates with 50% taken by foxes (Banks et al 2000). Contemporary science agrees that the maximum population growth rate is 10% (Arnold 1991; Bilton & Croft 2004). A female kangaroo, aged 2 to 3 years old, will have one joey a year. A joey stays in the pouch for approximately 11 months, which means a female kangaroo can only have one joey a year. Averaged across species, it takes an average of 18 months for a kangaroo joey to become fully independent of its mother (eg Poole 1975; Jackson; Staker, L; Dawson 1995) effectively producing just one joey to independence per annum. Mortality rates for joeys are high, around 73% during good times and 100% during bad times. Kangaroos don't breed during drought because there isn't enough food.

Impact of Farming: Australia has cleared 80% of land for agriculture – crops and livestock. Australia grazes 69 million sheep, 27 million cattle and 2.5 million goats. White settlers cleared the land of trees and kangaroos so they could grow crops and graze livestock. Kangaroos were shot for simply being in the way. This tradition continues today. Too many farmers maintain the attitude of white settlers: a kangaroo found on farmland must be shot. Kangaroos are also shot for living on land earmarked for development.

We live in a world where no animal is allowed to live unless it has value to humans. Unfortunately, Australian governments see kangaroos as a resource for a commercial industry. Kangaroos are tolerated so that 3 million wild kangaroos can be killed each year for their meat and skins. The only reason Australia culls kangaroos is because a commercial industry

needs the dead bodies to supply domestic and overseas markets.

Impact of kill-for-profit program on kangaroos in NSW and Queensland

Both NSW and Queensland have allowed kangaroos to be killed for profit for some years.

Despite there being a 'quota' system which was supposed to ensure kangaroos were killed at a 'sustainable' level, kangaroo numbers in some areas are now so low that a number of 'zones' have been closed to killing.

Victoria will very likely have the same outcome.

How this impacts us Whilst we have experienced some small business operators in our area seeking ACTW permits to kill kangaroos, we now find ourselves in the situation of living in a Green Wedge shire where native wildlife are being killed – cruelly – to provide secondary income for someone.

We don't know from one day to the next when kangaroos who we know by sight, and whose presence enriches our quality of life, will be alive – or shot under a 'job creation scheme'.

Our safety is also at risk. A warning recently went out to residents in one area, via social media, to 'stay away from their windows' as kangaroos were going to be shot that night.

One resident also heard a bullet go past her when she was putting out the rubbish bins.

This impacts our amenity, safety and mental wellbeing. At least one resident, who has lived here for 20 years, is now considering leaving due to the mental health impacts that the killing is causing.

We are further being impacted by the desire by Heritage Golf Course in Chirnside Park, which is partly situated on land in our shire, in an Environmental Living Zone. Under the kangaroo killing program, the owners approved the killing of kangaroos who visit the golf course.

Due to considerable community concern, the owners did not go ahead.

Instead, their dogs have been seen chasing and mauling kangaroos on the golf course, to the considerable distress of locals.

Nillumbik residents are involved preventing harm to these kangaroos.

Kangaroos are important to our environment:

- They aerate soils, top graze dry native grasses thus promoting regenerative growth, and reducing the risk of bushfires.
- They are essential in seed dispersal, have soft padded feet, and don't have a water-focused grazing pattern.
- Kangaroo poo is THE best natural fertiliser on the planet, ask any sustainable food producer.
- Research shows that mixed grazing, at sustainable stocking rates between cattle and kangaroos or sheep and kangaroos, is more productive and ecologically sound as kangaroos counteract the destructive grazing patterns of introduced hard-hooved livestock.
- Kangaroos are a keystone species upon which various other indigenous species of flora and fauna depend for their own survival. (Aunty Ro Mudyin Godwin, 2019)
- The soft padded feet and long tail of the kangaroo are essential for the ecological health of the land as regenerators of native grasses. (D Ramp)

Impact on wildlife carers

Several of our members are voluntary wildlife carers. In addition to caring for wildlife who are injured due to vehicles, fences, poisons, Phalaris, and mange, they now find themselves potentially caring for kangaroos who were deliberately shot.

It can cost a carer approximately \$2,000 to care for a joey whose mother was killed by a vehicle and release them to an area where, before this program was implemented, kangaroos would have been safe.

To spend so much time – and money - caring for them, only to see them shot by someone for a very small amount of money, causes considerable mental anguish.

Recommendation

We ask that the Act be revised so that it is not possible to kill native wildlife for profit, as is happening under the Kangaroo ‘Harvesting’ [sic] Program.

The method used to estimate kangaroo numbers is not accurate.

It is not possible to kill the number of kangaroos permitted under the quota system without causing regional extinctions.

Residents in many areas of Victoria are now living with the risk of being shot.

There is no monitoring. An independent assessment of compliance with the Code, carried out by Animal Liberation NSW between 2005 and 2008, has identified an average of 40% of kangaroos per chiller in 24 chillers throughout New South Wales and Queensland were neck shot. Neck shot kangaroos may suffer a painful death, which is a clear transgression of humane practices and the Code guidelines.” (*A Shot in the Dark: A Report on Kangaroo Harvesting* by Dror Ben-Ami, PhD, 2009)

“Cole has come home with 16 roos, a disappointing tally. He shot two more, but couldn’t find them to retrieve. He’d climbed onto the tray, looked through the monacle that uses thermal imaging to detect body heat, but no good.” (*From dusk to dawn: A night in the life of a roo shooter*, ABC News, 2018)

No one knows how many kangaroos are injured and disappear into the bush to die slow, painful deaths. Injured kangaroos are never recorded or acknowledged by the commercial industry.

It would be illegal to treat a dog or cat this way.

The government’s own inquiry recommended against it.

Native waterbirds

Introduction

We believe the Wildlife Act should protect all native species.

This is not currently occurring.

Aerial surveys of native waterbird populations have shown consistent declines in populations. Despite this, each year, a 'season' for killing native waterbirds is approved.

Recommendation

- Protect all native wildlife under the Act, including waterbirds
- Until then, require that all approvals are based on independent scientific evidence of waterbird numbers, rather than decisions being made by the Game Management Authority, which has a clear conflict of interest. This would be appropriate for a Biodiversity Commission
- Under the Act, allow evidence submitted by individuals to be admissible in prosecuting individuals eg videos, photos
- As for other species, increase penalties for people who harm wildlife illegally including those who:
 - shoot threatened species (Freckled Ducks are shot each and every 'season' and are buried or left on the wetlands)
 - fail to retrieve birds they have shot who are injured or dead
 - fail to immediately kill all birds
 - use boats to flush birds from reeds
 - shoot more birds than the daily 'bag limit'
 - shoot outside of the permitted hours.

Dingoes

Introduction

Although Dingoes are no longer found in our area, we remain concerned about their persecution and the impact this has both on them as a native species, and on biodiversity in general.

Dingoes are Australia's apex land predator. They play a crucial role in maintaining ecological balance, as they predate on introduced species.

They are a threatened species under the Flora and Fauna Guarantee Act. Under the Wildlife Act 1975, Dingoes are supposed to be protected.

Research has found that, where Dingoes are present in areas where they were traditionally found, there is greater biodiversity than where they are not.

However, under the Catchment and Land Protection Act 1994, hybrids of Dingoes and domestic dogs are listed as pest animals. Under the FFG Act, Dingo-dog hybrids are not considered to be Dingoes, regardless of the level of hybridisation.

Dingoes are persecuted by farmers under the Order in Control system. This is predominantly done through the use of poisons, such as 1080, and leg hold traps.

In light of the 11 aspects that the panel will consider in this review, the Act as it currently stands fails Dingoes in all of them.

Conflation of Dingoes with 'Wild Dogs'

The term 'wild dog' is being used to kill Dingoes in large numbers, under the guise of reducing predation of farmed animals, such as sheep.

Unlike Dingoes, domestic dogs do not have the ability to survive in the wild without human assistance.

Use of the term 'wild dog' is a misnomer. It is actually our native Dingo who is being killed in large numbers.

Dingoes cannot easily be distinguished from similar-looking domestic dogs by sight. DNA analysis is required to determine if they are a Dingo or a domestic dog.

DNA analysis of 'wild dog' bodies and skins has shown that most are pure Dingoes.

Farmed animal losses	<p>Reported losses of farmed animals to Dingo predation in Victoria are very low.</p> <p>In 2018-2019, of the nearly 15 million sheep in Victoria, only 261 (less than 0.002%) were reported to have been killed or maimed by Dingoes. This represents a cost to the sheep/wool industry of just 0.28%.</p> <p>Despite this, the National Wild Dog [sic] Action Plan claims that Dingoes represent ‘a significant problem’. More than 8,500 poison baits were to be used to kill Dingoes in 2019/2020.</p>
Order in Council	<p>The Order in Council has declared Dingoes as ‘unprotected wildlife’ on all private land, and on public land within 3km of any private boundaries, over more than half of Victoria’s land mass. They can legally be killed in those areas.</p> <p>Hybrids of Dingoes and domestic dogs are classed as ‘pest animals’ throughout Victoria.</p>
Use of 1080 poison	<p>The widespread killing of Dingoes in many parts of Victoria, under the guise of reducing farmed animal losses, is of concern to many, especially in light of the cruel methods used to kill them, namely poison and leg hold traps.</p> <p>It takes herbivores up to 44 hours to die from 1080 poisoning and carnivores up to 21 hours. 1080 poison kills non-target animals, including the endangered Spot-tailed Quoll and raptors.</p> <p>It can also kill farmed animals, due to ravens and crows dropping poisoned baits into dams and water troughs.</p>
Leg hold traps	<p>It is now legal in Victoria to allow a Dingo to suffer in a leg old trap for three days (72 hours). Even then, who is monitoring trappers to ensure no Dingo is trapped in a leg hold trap for more than three days before being shot?</p>
Bounty	<p>The gross misrepresentation of the number of farmed animals killed by Dingoes has led to the introduction of a bounty system for ‘wild dog’ scalps.</p> <p>DNA analysis of many scalps has shown that most are pure Dingoes.</p>
Indigenous people	<p>The Dingo is a totem animal for some indigenous people. Their widespread persecution fails to consider the impact on First Nations.</p>

Community expectations

The community increasingly opposes the use of lethal control of wildlife, particularly:

- for a keystone species like the Dingo
- when any impact on animal agriculture is miniscule and better managed in other ways.

Recommendations

- Remove the Order of Control from the Act
- Cease using the term 'wild dog' to hide the killing our apex land predator
- Remove Dingoes as a classified 'pest animal' under the Catchment and Land management Act
- Implement a farmer compensation scheme for the small number of losses due to Dingoes
- Ban the use of 1080 and PAPP poisons
- Require farmers to improve their husbandry methods, including using livestock guardian animals and fladry to protect farmed animals
- Redirect funds spent on killing Dingoes to help farmers improve their practices

Support for wildlife rescue and research

Introduction

A number of our members are voluntary wildlife rescuers or foster carers.

They provide a highly valued community service that is essential both to the animals and the people in the community that care about them.

They are very dedicated and currently fund most of their medical care and rehabilitation, themselves.

No carer expects to be paid for the time invested in caring for sick and injured wildlife. However, the financial burden of paying for veterinary care (X-rays, medication, blood tests etc) and consumables (formula, food etc) is considerable.

Providing financial assistance for these expenses will ensure that more carers have the financial ability to continue saving the lives of our wildlife.

Another example of how we do not support wildlife research in Australia is the case of the echidnas. The team of researchers working on Kangaroo Island get all their funding from overseas. They have personally confirmed to one of our members that they have never received funding from Australia.

Recommendation

Include financial assistance for wildlife rescue veterinary care and consumables within the Act.

Include guidelines to the national government so that research is funded in the Act.

Wildlife and vehicle collisions

Introduction

As the human population grows, and we destroy more and more wildlife habitat, wildlife being hit by vehicles is more and more common.

This is a grave issue in our shire, and one of the reasons our organisation was formed.

Sadly, some people seem to delight in killing native wildlife.

Early one morning on a local road, when there was little traffic around, one driver was observed to accelerate to hit two kangaroo joeys. Whilst a photo of his car and registration was taken, and the incident reported to police, we are not aware of any prosecution.

When an animal is hit by a vehicle, although they may 'appear OK' and move away from the road, they have often suffered fatal injuries including broken limbs and pelvises.

At present, it is not uncommon for wildlife rescuers to be advised of a kangaroo who was hit by a vehicle three days earlier and has lain, injured and suffering, against a fence.

Further, the presence of deceased animals on roads increases the risk of secondary fatalities eg by Wedge-tailed Eagles who go to eat the deceased animal.

Recommendation

As is the case for people, make it illegal under both the Road Safety Act 1986 and the Wildlife Act for a person to fail to stop and render assistance to wildlife who have been hit by a vehicle.

This may be in the form of calling a recognised wildlife organisation, such as Wildlife Victoria or, in our area, Wildlife Rescuers to let them know of the injured animal.

This will reduce the length injured animals suffer and enable their more humane euthanasia.

Whilst this is a requirement under the *Road Safety Act*, we are not aware of any instance where this has been enforced.

1080 and PAPP

Introduction

We are very concerned about the use of some poisons in Victoria, including by government authorities.

These poisons are not target-specific and harm many native species.

Recommendation

They also cause extreme suffering to whoever eats the poison.
Prohibit the use of 1080 and PAPP in Victoria.

Thank you

Summary

Thank you for considering our submission.

We hope it assists in developing a wildlife act that protects native wildlife and is effective in preventing extinctions, something which the current Act is failing to do.

Yours sincerely,

Liezl Shnookal
Chair
Wildlife Advocates Nillumbik