

Countrywide Pet Foods Pty Ltd

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Department of the Environment, Water, Heritage and the Arts.

Dear Sir/Madam,

RE: Supporting evidence for Application of a Small Scale Wildlife Trade Operation.

Countrywide Pet foods P/L (**CWPF**) is lodging an application for a Small Scale Wildlife Trade Operation (WTO), for the ability to export Eastern and Western Grey Kangaroo skins collected in Victoria. This is being done under the auspices of the Victorian Governments two year trial which is facilitating the processing of these two species in controlled regions for the production of Pet food. These special licences are issued by the Victorian Department of Environment, Land, Water, and Planning (DELWP - previously Dept of Environment and Primary Industries) as individual Authority to Control Wildlife (ATCW's) under section 28A of the Wildlife Act 1975 for the control of Kangaroos that are damaging pasture, crops or other property or impacting on biodiversity values.

CWPF has been issued a Wildlife Processor Licence (Licence No. 14360888) by the Victorian Government (attached), to processes Eastern and Western Grey Kangaroos for pet food, from private farm land that have been issued with the relevant ATCW. We are now seeking to have approval for a WTO to allow the skins collected as part of this processing to be exported under Part 13A of the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) for species protected under the convention on international Trade in Endangered Species of Wild Fauna and Flora (CITES).

CWPF is fully compliant with the Victorian Governments requirements for the processing of Eastern and Western Grey kangaroos for Pet food, with audits and oversight from both DELWP, and PrimeSafe Victoria. The following documentation details our reason for a WTO and processes undertaken in complying with the Victorian Governments requirements. If required we can supply a copy of our Quality Control operating manual with the relevant section applicable to the operation of collection and processing of Kangaroos at our facility.

We also note that the Minister for the Environment has recently gazetted a Declaration of an Approved Wildlife Trade Operation for the export of Kangaroo Skins derived from those Kangaroos processed during the two year trial (the Plan) in Victoria. We submit that **CWPF** be included or issued with a WTO for the same purposes.

Yours sincerely

Michael Scales

On behalf Countrywide Pet Foods P/L

Introduction

This management plan puts forward a mechanism to enable overseas export of Kangaroo Skins collected as a by-product from Countrywide Pet Foods P/L (**CWPF**) that have been processed as part of the Victorian Government's Kangaroo Pet Food trial for domestic pet food.

The Victorian Department of Environment, Land, Water, and Planning (DELWP) - previously Department of Environment and Primary Industries (DEPI)) issues Authority to Control Wildlife (ATCW's) under section 28A of the Wildlife Act 1975 for the control of Kangaroos that are damaging pasture, crops or other property or impacting on biodiversity values.

In order to do this it aims to satisfy the requirements for a small scale, approved Wildlife Trade operation (WTO) under section 303FN of the Commonwealth Environment Protection and Biodevesity Conservation Act 1999 (EPBC)

Scale of Proposed Operation

Under the EPBC Act and its associated regulations an operation is a small-scale operation if it has a low impact on the survival or conservation status of the species to which it relates. The proposed operation is considered small-scale because it is only operating with a small area of Victoria. Kangaroos will only be taken from those shires taking part in the Kangaroo Pet Food Trial as defined by the DELWP. Historically DELWP issues 850 to 2,200 ATCWs for the lethal control of 30,000 to 70,000 Kangaroos annually. The shires nominated by the DELWP are indicated in the document published by DELWP, *Kangaroo Pet Food trial – Overview* (attached), **CWPF** will be primarily focus processing of Kangaroos taken from the eastern shires (Hume), but also smaller numbers from the western shires (Grampians). In the first year of the trial (2014/2015) the Victorian Government issued 253 special ATCWs permits for processing, representing 23,000 Kangaroos, out of a total of 2,000 permits and 115,000 Kangaroos for lethal control in Victoria.

This WTO seeks to allow for the export of skins taken during the trial. **CWPF** expects to process only a percentage of the total number of Kangaroos to be issued by DELWP ATCWs, estimated to be no greater than 5,000. Given the Victorian DELWP estimated number of kangaroos to be processed within the scope of the Kangaroo Pet Food Trial and the relatively small size of the proposed export activity, the operation is considered to be small scale.

The Proposed Wildlife Trade Operation

This plan presents an auditable process for **CWPF** to source Kangaroo skins for export. The proposed WTO is based entirely on Kangaroo skins sourced from animals within those shires listed in the Kangaroo Pet Food Trial for domestic pet food and within the guidelines set out be the DELWP Kangaroo Pet Food Trial. The Plan provides a process to ensure that the WTO operates in a manner that satisfies government requirements and to minimise public concerns about welfare and sustainability. The species covered by the Wildlife Trade Operation are Western

Grey Kangaroos (*Macropus fuliginosus*) Species Code Number 1263 and Eastern Grey Kangaroos (*Macropus giganteus*) Species Code Number 1265.

State Regulations

Until now Kangaroos shot under the control of DELWP and ATCWs have been left to decompose on the property of origin, representing a waste of resources. The Kangaroo Pet Food Trial of two years commencing on 1 July 2014 will enable Licenced Operators to further process these Kangaroos. The Victorian Government and its relevant governing departments have set out the guide lines required.

Kangaroos will be processed at **CWPF** Licenced Pet Meat Facility, located in Stanhope Victoria. **CWPF** produces pet food under the control of PrimeSafe, Victoria, (Licence No K00018), where it is required to meet conditions for the *Standard for the Hygienic Production of Pet Meat. PISC Technical Report 88 – Amended 2009*. As part of the trial program CWPF has also applied and been issued by DELWP with a Wildlife Processors Licence (Number 1436088) for the processing of Kangaroo Meat for pet food, in accordance with Regulation 23 of the Wildlife Regulations 2013.

Region of Kangaroo Pet Food Trial

Western Grey Kangaroos (*Macropus fuliginosus*) and Eastern Grey Kangaroos (*Magropus giganteus*) occur with the designated shires shown on the attached map. **CWPF** will only process Kangaroos from these areas, from land owners that have applied and received valid Kangaroo Pet Food Trial – Authority to Control Wildlife (ATCW) type 12 permits. All kangaroos processed will be able to be identified and traced back to the property of origin. All Kangaroos will be identified with an individual numerical tag that will remain on the skin.

Tags will identify the ATCW licence and the carcass number (the carcass number being the next sequential number of kangaroos under control for that ATCW licence)

A documented control of tags will be maintained by **CWPF** and balanced against ATCWs and kangaroos processed.

Skins

All skins for export will be sourced only from those areas identified within the Kangaroo Pet Food Trial. All skins will be identified with a tag, which is attached by the contract shooter prior to receipt at **CWPF** the tag is remains on the hide during processing. The wildlife Department with DELWP control the number of animals sourced by the issuing of Permits, ACTWs thus ensuring that the abundance of these animals are not threatened. Skins will be sold to a licenced Hide Dealers (Skins).

Length Season

The operation will be undertaken throughout the Trial dates ending June 2016.

The Number of Kangaroos

Will be limited to the permits issued by DELWP. **CWPF** will only process a small percentage of those permits. Actual numbers are not available, as this is the first time kangaroos have been permitted to be used as pet food within Victoria.

Licensed Shooters

All shooters will be required to hold a current relevant State Government authorised Shooters licence, which is recognised by the Victorian Government. A copy of which is recorded in **CWPF** Quality Assurance Program. The Preferred Shooters are required to operate under the guidelines set out in the National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes and will be trained in food safety procedures to as outlined in the *Standard for the Hygienic production of pet meat*, *PISC Technical Report 88 – Amendment 2009*, to ensure company outcomes are met.

The Impact to species during the Kangaroo Pet Food Trial

Authorities to Control Wildlife (“ATCW”) permits have been issued within Victoria for many years. DELWP has continued to issue such permits throughout these years indicating that the rate of disposal has had no observable impact on the viability of the Victorian Western Grey Kangaroos (*Macropus fuliginosus*) and Easter Grey Kangaroos (*Macropus giganteus*) population.

Controls

CWPF is controlled by Section 28A of the Wildlife Act 1975 and Wildlife Regulations 1992, existing PrimeSafe regulations and *The Standard for The Hygienic Production of Pet Meat. PISC Technical Report 88 – Amended 2009*. **CWPF** has in place a system of tagging the Kangaroos. Each kangaroo will have a tag attached to the skin that is numerical and individual. The tags will be numbered in sequence displaying the ATCW Licence number and sequential number controlled against that ATCW.

Only licenced Kangaroo processors can produce and sell meat and by-products in Victoria. Protected Wildlife Record Books are issued by the Department of Conservation and Natural Resources, Victoria. For the recording of all Kangaroos through **CWPF** facility, and are required to be maintained as and when Kangaroos are processed. An Annual Return Form, Wildlife Processor Licence is required to be completed (copy provided as part of the Wildlife Processor licence.) **CWPF** has its own controls regarding the issuing of tags and is documented in our Quality assurance Manual (copy provided). Tags attached to the carcass (and remains with the skins) will indicate (1) The ATCW permit #, and (2) the sequential number (1,2,3,...) of the Kangaroo controlled from that ATCW permit.

Summary

CWPF has developed a program that will enable it to participate in the Kangaroo Pet Food Trial and meet all statutory requirements set out by those Victorian Government Departments. It is submitting an Application for Approval of a Wild Life Trade Operation. The information set in this application aims to satisfy the requirements for a WTO (Small-Scale).

List of Documents attached to this application

Copy of Countrywide Pet Foods P/L licence (K00018) issued by PrimeSafe

Copy of CWPF Wildlife Processor Licence (# 14360888) issued by Victorian Department of Environment and Primary Industries (DEPI, now renamed Department of Environment, Land, Water and Planning (DELWP))

Copy of CWPF Quality Assurance Manual – Appendix 3 Detailing control and procedures for Collection and processing of Kangaroo's at CWPF, with relevant control documents.

National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes

Authority to Control Wildlife Application Form – Kangaroo Pet Food Trial

Kangaroo Pet Food Trial – Overview (Showing map of participating shires)

Kangaroo Pet Food Trial – Information for pet meat processing facilities

Kangaroo Pet Food Trial – Information for landholders

Kangaroo Pet Food Trial – Information for shooters

Copy of *The Standard for The Hygienic Production of Pet Meat. PISC Technical Report 88 – Amended 2009*