

Wildlife Trade Operation Application

**Management Plan for the Commercial Harvest and Export of
Bennett's Wallaby Skins from Tasmania**

2015 to 2018

Lenah Game Meats Pty. Ltd.

The Tasmanian Department of Primary Industries, Parks, Water and the Environment confirms that the monitoring and regulatory processes for which it is responsible are accurately described in this document.

1. Introduction

This Management Plan details a mechanism to be followed by Lenah Game Meats Pty Ltd that will permit the overseas export of skins, or fur removed from the skins, obtained as a by-product from Bennett's wallaby (*Macropus rufogriseus rufogriseus*) harvested in Tasmania to supply domestic meat markets.

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 Biodiversity Conservation Act 1999* (EPBC Act).

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 can be considered small-scale because the number of specimens it proposes to make available for export represents only a small proportion of the reported annual take of Bennett's wallaby in Tasmania and is well below what could be considered a maximum sustainable yield from the Tasmanian population.

This WTO allows for the export of skins and fibre from 60,000 Bennett's wallaby taken annually to supply domestic meat markets. This represents less than 10% percent of the average total estimated annual take of Bennett's wallaby across Tasmania over the past ten years. A take which has had no obvious impact on population trends.

Scale of the Existing Bennett's Wallaby Harvest

The annual cull of Bennett's wallaby has averaged approximately 620-630,000 animals per year since 2002. This total has comprised a commercial harvest of 20-30,000 along with a non-commercial cull of approximately 597,000 annually (WMB, unpublished data). This level of harvest has had no observable impact on wallaby populations (see Figure 1) and has been shown to be sustainable in all management regions of the state. The current commercial harvest at approx. 30,000 animals only represents approximately 5% of the total number of Bennett's wallabies taken annually in Tasmania. Even allowing for substantial predicted growth to 60,000 animals based on increased demand for meat, the commercial harvest will still only be 10% of the total combined existing cull and is likely to simply replaced that level of non commercial cull rather than leading to overall-all increase in the cull. This WTO simply seeks to allow skins and fibre from this small percentage of the total state-wide annual take to be exported. Given the size of the total harvest of this species, the lack of observable impact of this on the total population and the relatively small size of the proposed export activity, the operation can therefore be considered small scale.

The Proposed Wildlife Trade Operation

This Plan presents an auditable process to be strictly adhered to by Lenah Game Meats to source wallaby skins and fibre for export. The proposed WTO is based entirely on wallaby skins sourced from animals harvested for domestic meat markets. The Plan details a process to ensure the WTO operates in a manner which satisfies government requirements and minimises public concerns about welfare and sustainability issues.

The WTO will apply for three years from approval or until approval of a state-wide wallaby management plan, whichever is sooner. The intent of this WTO is to facilitate the export of skins or fibre from animals harvested and processed commercially for domestic meat markets. No animals will be harvested specifically to service this WTO. Consequently, the development of an export fur and fibre trade under this WTO will not result in any additional take of Bennett's wallaby.

Unless exported, almost all of the skins from commercially harvested animals would be discarded as waste as there is no viable domestic market for this resource. Bennett's wallaby skins do not make very good leather since the skin surface is generally highly scratched from fences and fighting. They do however make a very useable fur product. Unfortunately for Tasmanian wallaby harvesters and processors, there is only a very small domestic market for fur skins.

Lenah Game Meats (LGM) has reliable export markets for Bennett's wallaby skins for use in the international fur trade. In addition, Lenah has been attempting to develop a market for the fibre (fur) from skins. The fur is removed from the skin and sold as a separate product. The markets for this product are entirely overseas.

State Regulation of the wallaby harvest

Bennett's wallaby are harvested and processed in Tasmania for human consumption and pet food under the control of the *Nature Conservation Act 2002* and the *Meat Hygiene Act 1985*, respectively. Meat processing premises and harvesters are registered and licensed by the Food Safety Branch (FSB) and Wildlife Management Branch (WMB) respectively of the Department of Primary Industries, Parks, Water and Environment (DPIPWE).

Bennett's wallaby are listed as Partly Protected Wildlife under Schedule 4 of the *Wildlife (General) Regulations 2010* of the *Nature Conservation Act 2002*. As such, they can be taken by licensed hunters during an open season and permits can be issued to allow them to be taken at any time for crop protection, or other approved purposes.

In endorsing this WTO, the DPIPWE acknowledges its intention to monitor the Tasmanian Bennett's wallaby population through the undertaking of annual spotlight surveys (Section 5), monitoring the commercial take of Bennett's wallaby and providing the resulting data to LGM for reporting to the Commonwealth as required under Section 10. The DPIPWE also acknowledges its responsibilities for ensuring activities undertaken under this WTO comply with the *Wildlife (General) Regulations 2010* of the *Nature Conservation Act 2002* (Section 7) and the *Animal Welfare Act 1993* (Section 8). All other requirements outlined under this WTO remain the responsibility of LGM.

3. Harvest details

3.1 Region of Harvest.

Bennett's wallaby occur widely throughout Tasmania and occur in most vegetation types with the exception of extensive areas of cleared land (Rounsevell *et al* 1991). Consequently, they may be harvested from all regions of the state except the South west region, which consists predominantly of areas designated as conservation reserves (e.g. World Heritage and National Parks) where hunting is not permitted.

All harvesting will take place on land used for primary production.

3.2 Source of skins and fibre.

All skins and fibre for export will be sourced only from animals taken and processed commercially for their meat in premises licensed by FSB. Mechanisms to ensure the export will not threaten the abundance of the species across its existing range are described at Section 6.

3.3 Method of Harvest.

Wallabies are harvested by shooting at night with the aid of a spotlight. Harvesters are licensed by the WMB and accredited by the FSB. In order for a licensed harvester to take wallaby from land at night with the aid of a spotlight, the landowner must have a current crop protection permit issued by the DPIPWE. FSB requires that animals entering the commercial trade must be taken according to the *Animal Welfare Standard for the Hunting of Wallabies in Tasmania* and must be brain-shot. This is regulated by FSB through regular audits of processing premises (quarterly) and harvesters (at least annually, often more regularly).

3.4 Harvest season.

The harvest is and will be undertaken throughout the year.

3.5 Size of the Harvest.

The total export of Bennett's wallaby skins and fibre from Tasmania will be set at a maximum of 60,000 animals.

4. Impact on the harvested species

As noted above the combined commercial and non-commercial wallaby culled in Tasmania exceeds 600,000 animals per year. This rate of harvest has had no observable impact on the viability of the Tasmanian wallaby population (see Figure 1). It should also be noted that current the commercial harvest constitutes approximately 5% of the total annual take of Bennett's wallaby and even with predicted growth will still be only 10% of the long term average total State-wide cull

The WTO has mechanisms in place to ensure that if wallaby densities fall below conservatively set trigger points, the exports of skins will cease. The trigger point mechanisms are described in Section 6.1. They are designed to ensure the trade in skins facilitated by export does not contribute to a trade that will be detrimental to wallaby populations.

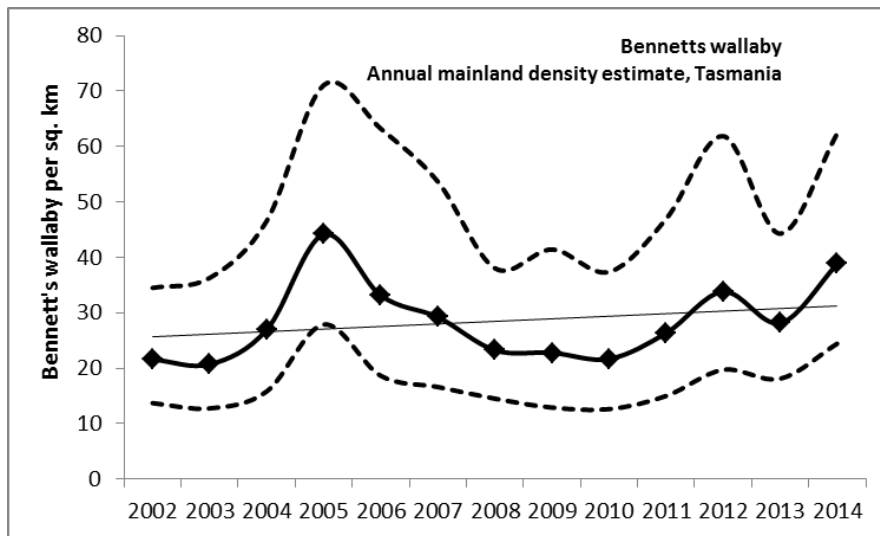


Figure 1: Density trends for Bennett's wallabies in Tasmania for the period since 2002. Solid line represents the mean density (wallabies per km²) the dotted lines represent the 95% confidence limits and the thin straight line shows the long term trend.

5. Monitoring and assessment

5.1 Monitoring of Wallaby Populations.

Monitoring of trends in populations of Bennett's wallaby in Tasmania is undertaken annually by DPIPW through a system of standardised spotlight surveys. The surveys are carried out in accordance with the method set out in the *Tasmanian Spotlight Survey Manual* (Hocking and Driessen 1992) and have been undertaken annually since 1975. The survey methodology was modified in 2002 to include line transect sampling in an effort to improve survey precision and assist in minimising observer variation and seasonal differences.

Line transect sampling involves an observer moving along a transect line; in this case the survey route, recording perpendicular distances to detected objects. Objects away from the line are less certain to be detected than those that are on or near the line, which are assumed to be seen with certainty. The sample of detection distances allows a detection function to be modelled and the proportion of objects detected in a strip transect (= detection probability) to be estimated. An estimate of wallaby density along the transect lines can then be determined.

There are currently 173 standard 10 km spotlight survey routes. Data is collected and reported on a regional basis. Tasmania is divided into 5 regions, one of which is the South West of the state in which no commercial harvesting takes place. The standard spotlight survey routes are surveyed in November-January each year.

The results obtained by this method should be regarded as a repeatable *index* of population density rather than an estimate of total population size.

The results of the spotlight surveys are used to assess changes in density of wallaby species and will be presented in the Annual Report to the Commonwealth (see section 10). The trends in density will be used to assess the impact of harvesting on wallaby populations against Trigger Point 1 and the annual report will recommend if exports are to continue.

These density estimates cannot be extrapolated into estimates of absolute population size. However, estimates of population size are not essential for the management of the commercial harvest under this WTO, as the total quota of exportable skins has been set at less than 10% of the average annual cull and is a figure well below what would normally be considered a sustainable take.

The long term trends in the data collected in these surveys (shown in Figure 1) indicate a stable population.

The density indices for Bennett’s wallabies (as determined from spotlight surveys conducted in 2014) currently range from 9.7-78.2 **wallabies/km²** across mainland Tasmania (see Table 2).

5.2 Monitoring the take.

5.2.1 Existing Controls.

Under the Meat Hygiene Act, licensed wallaby meat processors in Tasmania can only purchase wallaby from harvesters licensed by the Wildlife Management Branch (WMB). All wallaby meat processors in Tasmania are required by DPIPWE to report monthly to WMB, on the number of wallaby they process.

DPIPWE require any person wishing to purchase and possess wallaby skins to be in possession of a Fauna Dealers (Skins) Licence from WMB and report monthly on the number of skins they purchase and from whom. All skins or fibre retained for trading are subject to a royalty payment to the WMB within 28 days of purchase or prior to export from Tasmania, whichever is sooner. On average 0.055kg of fibre is equivalent to one skin of one wallaby.

All skin or fibre exports must be accompanied by permits issued by both WMB and the Australian Government Department of the Environment, (DE).

5.2.2 Verification.

Table 1 charts the extensive licensing, reporting and verification controls in the supply chain.

Table 1: Supply chain controls for the export of Bennett’s wallaby skins and fibre from Tasmania

Supply Verification Chart			
Supply Link	Authority Required	Reporting Required	Verification available
Private property	Crop Protection Permit		
Licensed harvesters	WMB Commercial Wallaby licence	monthly return to WMB	
	FSB accreditation		annual reassessment against Welfare Code
Lenah Game Meats	FSB licence	monthly returns of wallabies processed WMB	} } }
	WMB Skin Dealers Licence.	monthly returns of skins purchased to WMB	} collate } to } ensure all
Lenah Game Meats	WMB Skin Dealers Licence.	monthly returns to WMB Monthly royalty payments to WMB (0.055kg of fibre is equivalent to one skin of one wallaby)	} data } matches
		annual report on Trigger Points (monitoring results) due by end of April	
Export	WMB Export permit and DE permit	DE export permit acquittals	

5.2.2.1: Verification of source of skins.

Licensed skin dealers are required by WMB to report monthly who they sell their skins to and in what numbers. WMB also requires LGM to provide monthly reports detailing the source and numbers of skins purchased. Licensed skin dealers are also required to have skins or fibre kept for trade to be subject to a royalty payment. The reports can be collated by WMB to verify that all skins sourced by LGM are sourced from licensed premises. On average 0.055kg of fibre is obtained from the skin of one wallaby.

Skins or fibre exported out of Tasmania require the issuing of an export permit from the WMB which verifies that they were obtained from appropriately licensed sources and royalties paid.

FSB audits licensed premises to ensure all wallabies supplied are sourced only from accredited harvesters.

5.2.2.2: Verification of numbers exported.

All exports are accompanied by permits issued by DE and DPIPW detailing the number of skins in each consignment. Total number of skins exported can be cross checked against numbers reported to WMB as purchased by LGM and retained for trading.

Permits must also be obtained to export fibre. In this case it shall be assumed each skin yields 0.055kg of fibre in order to calculate the number of skins the fibre was derived from.

6. Management Strategies

Mechanisms for trigger points to regulate skin exports will be in place to ensure this is a sustainable trade. It needs to be noted that these trigger points are highly conservative in terms of any effect on the population they reflect. In addition they initiate a complete stop to regional skin collection for export, not simply a slowing of the level of collection. They ensure that any export activity will not of itself impose a threat to wallaby populations.

6.1 Trigger Points.

6.1.1 Trigger Point One (TP1).

Wallaby populations in Tasmania have been monitored since 1985 (see Section 5). During the latter part of this period, the population has been relatively stable. In recent years a density index with a standard error has been derived for each of the four regions in which wallaby are commercially harvested. Note that wallaby are also monitored in the South West but no commercial harvesting takes place in this region.

Table 2: Density Index Figures for Bennett’s Wallaby

Region	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	Trigger point
Northwest	14.9	15.6	7.1	23.2	16.3	13.8	8.6	13.1	10.1	29.7	28.6	15.5	25.3	7.1
Northeast	28.6	23.9	25.4	48.8	26.8	35.1	31.6	26.4	18.8	25.1	37	38.8	39.8	18.8
Central	35.7	33.3	48.4	81.1	58.7	35.3	41.9	51.9	30.2	34.9	43.6	33.5	78.2	30.2
Southeast	20.4	15.5	37.7	53.8	33.8	39.7	26.2	6.9	9	30.8	33.8	28	41	6.9
Flinders Island						110.8	56.2	77.6	54.1	114.4	130.4	73.4	40.7	40.7
King Island						72.7	26.9	67.8	199.2	-	57.5	98.3	167.3	26.9

Trigger points for each region are the lowest recorded density in the preceding 10 years of available data. A reduction in density in any region to a density below the trigger point will trigger a stop to export of skins from that region until monitoring based on the following year’s spotlight surveys shows populations have recovered above the trigger point. The export of skins from those regions where the density index exceeds the trigger point will still be permitted. Export from the other regions (those not closed) can only occur if LGM has procedures in place that will ensure that skins harvested from the closed region will not be exported. These procedures will be determined at the time via adaptive management procedures in consultation with WMB. They may include, but not be limited to, the strategies outlined below. LGM must include an outline of the procedures to be implemented in its annual report in cases when restrictions are evoked (Section 10).

Exports from a closed region can only recommence following completion of the next year’s survey and then only if the results of that survey show a density index that exceeds the trigger point.

Below shows a worked example of how this trigger point would apply:

In 2014 the density in the Northwest region was 25.3. The trigger point for this region is 71. The density index is above the trigger point listed in Table 2, therefore the trigger point is not exceeded and exports can continue.

Control restrictions invoked by Trigger Point 1.

When Trigger Point 1 is invoked LGM will implement carcass and skin tracking systems as outlined below and recorded for monitoring purposes in the form at Attachment 1.

On receipt at LGM all carcasses from any zone in which the Trigger Point has been invoked shall be tagged with a lockable plastic tag of a unique design to any other in use at the time. This tag shall be placed through the skin in such a way that it will remain on the skin when removed off the carcass. The number and source of these carcasses shall be recorded in the attached form.

Skins from these carcasses shall be kept separate from all other skins and disposed of. When disposed of the numbers will be recorded in the attached form.

At the end of each month a reconciliation will be completed to ensure all skins from restricted carcasses have been disposed.

6.1.2 Trigger Point Two (TP2).

LGM will monitor the total number of Bennett's wallaby skins or fibre they export each calendar year and the year in which they were produced. If this number reaches 60,000 skins produced and exported in any one year, (using the fibre yield per skin of 0.055kg to calculate the number of skins any fibre was derived from) LGM will immediately notify the Department of Environment(DE)and no further skins will be exportable for that year.

The trigger point ensures that any demand for skins will not drive the commercial harvest to levels which could be considered to have a detrimental impact on the population.

7. Compliance

Wallaby management in Tasmania is administered by the WMB, under the *Nature Conservation Act 2002* and the *Wildlife (General) Regulations 2010*. Under Schedule 4 of the *Wildlife Regulations 1999*, Bennett's wallabies are classified as Partly Protected Wildlife throughout Tasmania. As such, they may be taken under the authority of a permit issued under Regulation 26 of the *Wildlife (General)Regulations 2010* on properties where they are causing crop damage. Permits may specify conditions with which the holder of the permit must comply.

In order for commercial harvesting of wallabies to be carried out, the commercial shooter must hold a Commercial Wallaby Hunter's Licence, which allows the harvesting of wallabies for commercial purposes on lands used for primary production.

Commercial wallaby hunters are permitted to sell wallaby carcasses only to licensed meat processors or their agents.

Permits are required from both DPIPWE and DE to export skins. These permits are issued only when the WMB is satisfied that the wallaby skins were legally taken, processed and royalties paid.

Compliance with TP2 is auditable as it is a condition of export permits that export acquittals are submitted to DE within 2 weeks of exports occurring. Subsequent applications for export permits will be denied if acquittals are not received. DE is able to monitor the cumulative export over the life of the WTO through receipt of acquittals and ensure that no further export permits are issued if the total export of skins and fibre exceeds 60,000 animals/year.

WMB has a team of five compliance officers whose responsibility is the enforcement of the *Nature Conservation Act 2002* and regulations as well as associated legislation such as the *Animal Welfare Act 1993*.

8. Animal Welfare

Under section 8 of the *Animal Welfare Act 1993* it is an offence to inflict unreasonable or unjustifiable pain or suffering to an animal. The requirements of the National Code of Practice

for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes are legally enforceable as conditions of the Commercial Wallaby licence under which all commercial harvesters must operate.

It is a requirement by FSB and a condition set out on a commercial harvester's licence by WBM that all wallaby entering a commercial licensed works are to be brain shot.

All commercial harvesters must complete a Certificate II in Meat Processing (Game Meat Hunters and Shooters) or equivalent from a registered RTO and pass a field audit in the harvesting of wallaby. All commercial harvesters are accredited in accordance with the provisions of the *Meat Hygiene Act 1995*, and the Australian Standard for the Hygienic Production of Wild Game Meat for Human Consumption. All commercial harvesters are audited annually with a field audit to ensure that all standards are being met and maintained. Game Meat Processing Plant cannot accept any wallaby harvested by the use of shotguns/dogs.

All Game Meat Processing Plants are audited on a regular basis by FSB to ensure that the processing plant is operating within the welfare standards set out

. Any breach of any condition set out in The National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes or by any other licensing act that applies to Commercial Harvesters and Games Meat Processing Plants will be liable to prosecution. This can include the potential loss of licence to operate.

8.1 Non-target considerations.

The argument is often raised in objection to kangaroo harvesting that removing dominant males and females upsets the social balance within a mob of kangaroos, thus having detrimental welfare effects on non-target animals. This WTO makes no comment on the validity of this criticism; it merely notes that Bennett's wallabies are less gregarious than the larger macropod species. Social relationships within groups of Bennett's wallaby are highly unstable, the only enduring relationship being between a female and her unweaned progeny (Calaby 1983; Johnson & Rose, 1995, Morton, S.R. and Burton, T.C. 1973). Studies of movement indicate that individuals are relatively sedentary, occupying small home ranges that overlap broadly with other individuals (Catt 1977; Mooney & Johnson 1979). This indicates that harvesting will have minimal impact on any social structures within a Bennett's wallaby population.

In addition, the identification of Bennett's wallabies in the field is well covered in the accreditation process for commercial shooters; hence the likelihood of harvesters shooting non-target species (e.g. forester kangaroos) is extremely low.

Key controls:

All harvesters are re-assessed under actual field operating conditions every year to ensure compliance with the Code.

All meat processors are audited regularly and assessment of compliance with the Animal Welfare Standard is part of the audit procedure.

9. Over-ride Provision:

This WTO shall be invalidated in the case of DE approving a Wildlife Trade Management Plan under section 303FO of the EPBC Act submitted by DE covering Bennett's wallaby in Tasmania as a whole.

10. Reports

Following the collation and analysis of survey data by WMB by the end of March, LGM will submit to DE by 30 April, an annual report on the following:

- The Bennett's wallaby density index reported by WMB for the previous year with its position against TP1; and
- Total number of wallaby skins purchased and/or exported for the previous calendar year
- Total number of wallaby harvested for the domestic meat market for the previous calendar year.

This report will detail if, given assessments against the trigger points, skins harvested in the current year will be eligible for export. If any of the regional density indices have fallen below their respective trigger points then, as set out in subsection 6.1.1, LGM will ensure that exports do not occur from animals harvested in that region. LGM will outline the procedures it has put in place to ensure that skins harvested from the closed region will not be exported in these reports.

11. Summary

This WTO:

- Acknowledges that in total an average of over 600,000 Bennett's wallaby are currently taken each year.
- Acknowledges that with out export markets skins from wallaby processed for domestic meat markets would be disposed of. This is worse than a waste as they would be dumped into landfill and result in methane gas emissions contributing to global warming.
- Acknowledges that this level of harvest has occurred for an extended time and appears to have no detrimental effect on the population.
- Proposes that up to 60,000 skins per year from animals processed for domestic meat markets can be exported.
- Puts in place mechanisms to stop exports if wallaby densities decline below conservative levels or if exports reach 60,000 skins taken in any one year.
- Documents the extensive licensing, reporting and monitoring controls in place to ensure compliance and establish an auditable supply chain.

The operation of this WTO will have no additional impact on the Tasmanian Bennett's wallaby population and puts in place a mechanism to enable skins from an existing, sustainable harvest to be exported and utilised.

Lenah Game Meats Pty Ltd commits to adhering to the requirements of this WTO.

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