

# Wildlife Trade Operation Application

## Proposal for the Commercial Harvest and Export of Products Obtained from Wallabies in Tasmania

**Lenah Game Meats Pty. Ltd.**

**(in consultation with the Department of Primary Industries, Parks, Water and the  
Environment)**

### 1. Introduction

This proposal puts forward a mechanism to enable export of wallaby products from Tasmania. 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), thereby allowing wallaby product taken under this proposal to be exported to overseas markets. For the purpose of this proposal,

- 1) ‘wallaby’ refers to both *Macropus rufogriseus* (Bennett’s wallaby) and *Thylogale billardierii* (Tasmanian Pademelon, known locally as rufus wallaby);
- 2) ‘products’ refers to meat, skins and fur (fibre removed from the skin).

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. This operation can be considered small-scale because the number of specimens it allows to be exported represents only a small proportion of what could be considered a maximum sustainable yield from the Tasmanian wallaby population.

This WTO allows for the export of product obtained from 200,000 wallabies annually. This is only approximately 20 percent of the long term average cull in Tasmania. This long-term cull appears to have had no impact on the population (see section 4). This WTO will replace that currently in place and due soon to expire of a similar nature submitted by Monks enterprises, which is no longer operating. In addition it will replace the existing WTO operated by Lenah Game Meats (LGM).

Since 2004, the take of wallaby in Tasmania has averaged approximately 900,000–1,000,000 annually (WMB, unpublished data). This level of harvest has had no impact on wallaby populations (Figures 1 & 2) and has been shown to be sustainable in all management regions. The proposed commercial harvest represents only approximately 20 percent of the total number of wallabies currently taken annually in Tasmania. This WTO seeks to divert this small percentage of the annual cull to a commercial harvest to be exported and thus it can be considered small-scale. It must be noted that the expectation is not that the overall state kill of wallaby will increase as a result of this WTO. Rather it is expected take will be diverted from crop protections culls to commercial harvest.

The WTO will apply for three years from approval or until approval of a state-wide wallaby management plan, whichever is sooner. Its intent is to facilitate a small scale export to trial the market potential and thus better inform the decision making process in establishment of any potential management plan.

The WTO's intent is not to increase the overall cull of wallaby and indeed it has in place mechanisms to prevent this. Wallabies are currently culled in large numbers as agricultural damage mitigation. This proposal seeks to turn an existing wasted raw material, which is often currently left to rot, into a valuable export and sustainable resource.

Wallabies are harvested and processed in Tasmania for human consumption and pet food under the control of the *Meat Hygiene Act 1985* and the *Nature Conservation Act 2002*. 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).

Wallabies are listed as partly protected wildlife under Schedule 4 of the *Wildlife Regulations 1999* of the *Tasmanian 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 Tasmania's wallaby population through the undertaking of annual spotlight surveys (Section 5), monitoring the commercial take of 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 Regulations 1999* 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.

## **2. Aim of the proposal**

This WTO lays out a mechanism by which an auditable process can ensure that wallaby product from animals processed by LGM can be exported in a manner which satisfies the public and government requirements that they be taken humanely and sustainably.

## **3. Harvest details**

### **3.1 Region of Harvest.**

Wallabies occur widely throughout Tasmania and occupy most vegetation types with the exception of extensive areas of cleared land (Rounsevell *et al* 1991) and can be harvested from any region of mainland Tasmania (however, due largely to its isolation and inaccessible terrain no harvest currently occurs in the South West).

The harvest will take place on private lands. In order for a licensed harvester to take wallabies from private land at night with the aid of a spotlight, the landowner must have a current crop protection permit issued by the DPIPWE.

### **3.2 Source of product.**

All meat product for export will be sourced only from animals processed commercially for their meat in premises licensed by FSB or the Department of Agriculture and Water Resources. Mechanisms to ensure the export will not threaten the abundance of the species across its existing range are laid out in Section 6.

### **3.3 Method of Harvest.**

Animals will be taken only by harvesters holding a current Commercial Wallaby Hunters Licence. FSB requires that animals entering the commercial meat trade must be taken by accredited Game Meat Harvesters according to the *Animal Welfare Standard for the Hunting*

of Wallabies in Tasmania (Appendix 1) and must be brain-shot. This is regulated by FSB through regular audits of processing premises (quarterly) and harvesters.

### 3.4 Harvest season.

The harvest will be undertaken throughout the year.

### 3.5 Size of the Harvest.

The total export of wallaby from Tasmania will be set at a maximum of 200,000. The average take of wallaby in the years 2002–03 to 2010–11 has been 900,000–1,000,000 per year. The proposed available commercial quota of 200,000 per year is approximately 20 percent of the current cull. It is not expected this take will be in addition to the existing cull, rather a diversion from the existing cull to a commercial harvest.

## 4. Impact on the harvested species

Wallabies have been commercially harvested and culled under damage mitigation permits for domestic purposes on mainland Tasmania at rates of 900,000–1,000,000 per year for a number of years (WMB pers. comm. 2011). These rates of harvest clearly have had no adverse impact on the viability of the Tasmanian wallaby population which has undergone no long-term decline over this period and particularly so over the past decade as demonstrated in Figure 1. Both species demonstrate a steady longer term upward trend in mean densities.

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

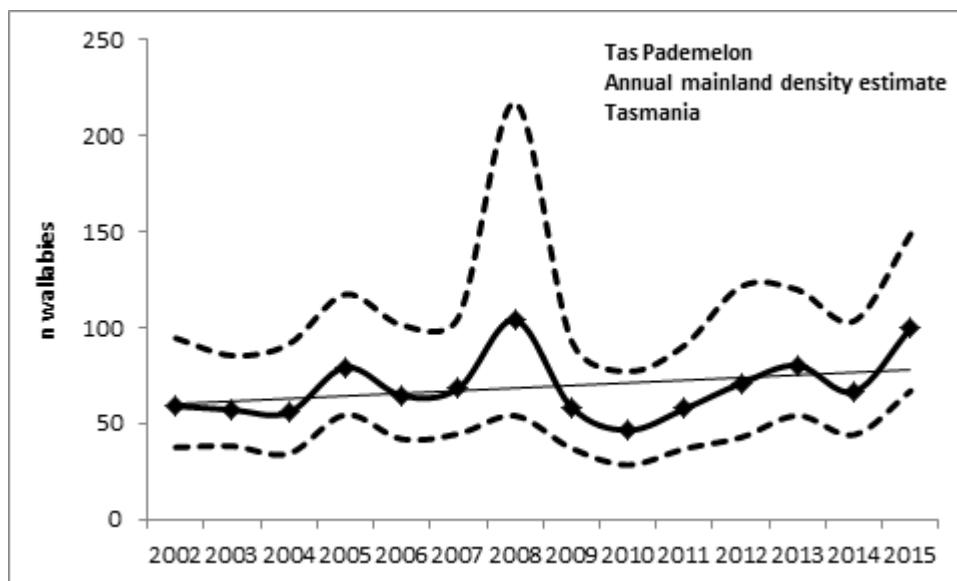


Figure 1: Population trends for Rufus wallaby (Pademelon) in Tasmania for the period 2002-2015. Solid line represents the mean count and dotted lines represent the standard error.

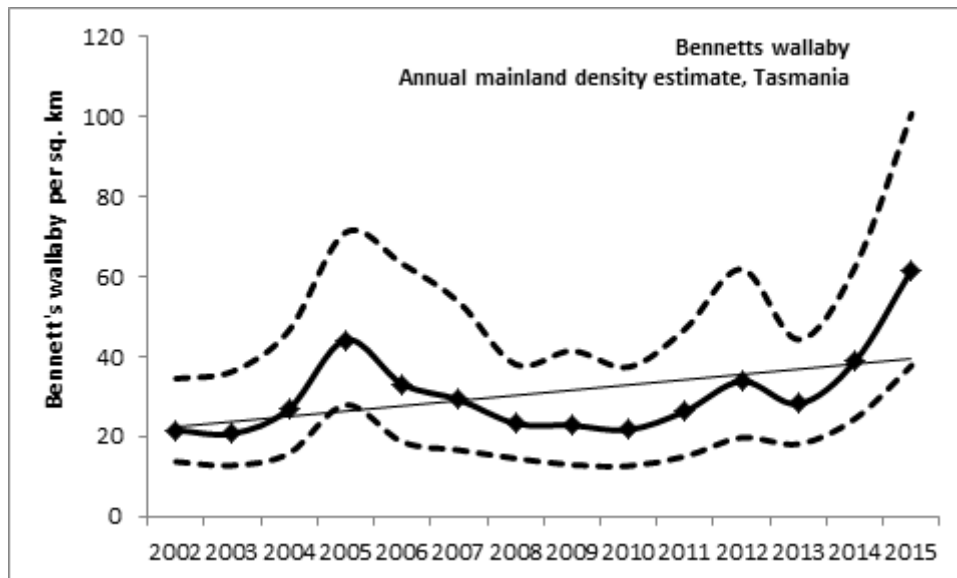


Figure 1: Population trends for Bennett wallaby in Tasmania for the period 2002-2015. Solid line represents the mean count and dotted lines represent the standard error.

## 5. Monitoring and assessment

### 5.1 Monitoring of Wallaby Populations.

Monitoring of trends in populations of wallaby in Tasmania is undertaken through a system of standardised spotlight survey counts performed annually by DPIPWE. The standardised 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 may often go undetected, but those on or near the line 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 in the vicinity of transect lines can then be calculated.

There are currently 173 standard 10 km spotlight survey routes in Tasmania.

Data are 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 currently takes place. The standard spotlight survey routes are surveyed in November-January each year.

The results of the spotlight surveys will be 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 has been set at less than 20 percent of the average annual harvest; a figure well below what would normally be considered a sustainable take.

The long term trends in the data collected in these surveys, as shown in Figure 1, indicate a stable long term population despite the existing commercial harvest, recreational kill and damage mitigation cull.

## 5.2 Monitoring the take.

### 5.2.1 Existing Controls.

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

DPIPWE require any person wishing to purchase and possess wallaby skins or fur to be in possession of a Fauna Dealers (Skins) Licence from WMB and report monthly on the volume of carcasses/skins/fur 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.

All skin and meat exports must be accompanied by permits issued by the Australian Government Department of the Environment and Energy (DEE) and DPIPWE.

### 5.2.2 Royalty Payment verification

Wallaby processed for export may be sold as meat, skins or fibre or any combination of all three products off any one animal. In order to reconcile exports against royalty payments the following schedule of average product yield will be used against the total number of wallaby processed to ensure exports over any given period do not exceed reported production.

<u>Product</u>	<u>species</u>	<u>average yield per wallaby</u>
Meat (bone in carcass)	Bennett wallaby	10 kg
	Rufus wallaby	5 kg
Skins		1
Fur	Rufus wallaby	0.07 kg

### 5.2.3 Verification.

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

<b>Supply Verification Chart</b>			
<b>Supply Link</b>	<b>Permits Required</b>	<b>Reporting Required</b>	<b>Verification available</b>
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 premises	FSB licence	Monthly returns of wallabies processed to WMB	}
			}
			}

	WMB Skin Dealers License.	monthly returns of skins/fur purchased to WMB	} collate } to } ensure all
Lenah Game Meats	WMB Skin Dealers License.	monthly returns to WMB Monthly royalty payments to WMB	} data } matches
		annual report on Trigger Points (monitoring results) due by end of April	
Export	DEE permit  DPIPWE export permit	DEE export permit acquittals Provide WMB with receipt of payment of export permit and proof of royalty payment.	

**Table 1: Supply chain controls for the export of wallaby from Tasmania**

*5.2.2.1: Verification of source of product.*

WMB will require LGM to provide monthly reports detailing the source and numbers of wallaby purchased.

Wallaby exports out of Tasmania will 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 DEE and DPIPWE detailing the product in each consignment. Total exports can be cross checked against numbers reported to WMB as purchased by LGM and retained for trading.

## **6. Management Strategies**

Mechanisms for trigger points to regulate exports will be in place to ensure this is a sustainable trade. Trigger points 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 by the State Government since 1975 (refer to Hocking and Driessen 1992 for a description of the monitoring method). During the latter part of this period, the population has been relatively stable. A density index with a standard error has been derived for each of the four regions in which wallabies are commercially harvested. Note that wallabies are also monitored in the South West but no commercial harvesting takes place in this region.

Trigger points for each region and each species have been set and will be fixed for the life of this WTO should it be approved (see Table 2). These trigger points are set at the lowest recorded density index for the years 2005–2015 for each region. This reflects the very secure, and indeed ‘over abundant’ status of both species as evidenced by the very high levels of

annual culling and the increasing trend in estimated population density. Consequently, even if, during the life of this WTO, they are determined to be at low population density in the context of the last 10 years, it is very unlikely that there would be any conservation concerns about either species. An appropriate response to any decline below the levels recorded in the last 10 years will be determined in consultation with DPIPWE.

<b>Region</b>	<b>Trigger point</b>
<b>Central</b>	19.6
<b>Flinders Island</b>	45.4
<b>King Island</b>	2.2
<b>Northeast</b>	59.6
<b>Northwest</b>	64.0
<b>Southeast</b>	23.4

**Table 2: Population density index trigger points by region for Rufus Wallaby**

<b>Region</b>	<b>Trigger point</b>
<b>Central</b>	34.9
<b>Flinders Island</b>	40.7
<b>King Island</b>	26.9
<b>Northeast</b>	25.1
<b>Northwest</b>	13.1
<b>Southeast</b>	26.2

**Table 2: Population Density Index Trigger Points by Region for Bennet Wallaby**

A reduction in density in any region to a density below the trigger point will trigger consideration of management options in consultation with WMB for that specie in that region for the remainder of that year. LGM must include an outline of these procedures in its annual

report (Section 10). Management options include closing a region to further harvest for a period or limiting the harvest from a particular region.

### **6.1.2 Trigger Point Two (TP2).**

LGM will monitor the total number of wallaby they process. If this number reaches 200,000, LGM will immediately notify DEWHA and no further animals will be harvested for export for the balance of that year. This can be cross checked by WMB from the monthly reports of wallaby processed submitted by LGM.

## **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 (General) Regulations 2010*, wallabies are classified as Partly Protected Wildlife throughout Tasmania. As such, they may be taken under the authority of a licence issued under Regulation 13 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 Hunting 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 or products (skins/fur) only to licensed meat processors, fauna dealers (skins/fur) or their agents.

Permits are required from both DPIPW and DEE to export any wallaby product. These permits are issued only when the WMB is satisfied that the wallaby products were legally taken, processed and royalties paid.

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**

The prevention of cruelty to animals, including wallabies, and the promotion of animal welfare are provided for by the *Animal Welfare Act 1993*. Section 8 of this Act makes it an offence to inflict unreasonable or unjustifiable pain or suffering to an animal.

The *Animal Welfare Act 1993* also provides for the development of Animal Welfare Standards. An *Animal Welfare Standard for the Hunting of Wallabies in Tasmania* has been developed and approved under section 44 of the *Animal Welfare Act 1993*. A copy of the welfare standard is shown in Appendix 1. This standard defines what is considered current best practice in the hunting of wallabies under Tasmanian conditions. In addition FSB require all animals entering the commercial trade to be brain shot. This is audited regularly at both the processing premises and harvest sites.

It is also a condition of a Commercial Wallaby Hunting Licence issued by WMB that wallabies are taken in accordance with the requirements of the *Animal Welfare Standard for the Hunting of Wallabies in Tasmania* and may only be brain shot.



The use of shotguns and/or dogs is not permitted by DPIPW in harvesting animals to be supplied for meat processing.

All holders of Commercial Wallaby Hunting licences must be appropriately trained and accredited. Persons harvesting for meat must be accredited in accordance with the provisions of the *Meat Hygiene Act 1986* and the Australian Standard for the Hygienic Production of Game Meat for Human Consumption. All accreditation will include training in the requirements of the *Animal Welfare Standard for the Hunting of Wallabies in Tasmania* and other relevant permit conditions, as well as a field-based assessment of competence in shooting. Shooting assessments are done in the field by a Certified Auditor. Accredited shooters within the game meat industry are reassessed at yearly intervals by the FSB as part of the auditing of Licensed Game Meat Premises. This reassessment includes their ability to adhere to the *Animal Welfare Standard for the Hunting of Wallabies in Tasmania*.

All meat processing premises are audited on a regular basis (usually quarterly) by FSB. Part of this audit procedure is to ensure compliance with the animal welfare standards.

The extent of compliance with the requirements of the *Animal Welfare Standard for the Hunting of Wallabies in Tasmania* and permit conditions relating to shooting requirements is determined through annual in field audits of all harvesters and is currently at or near 100 percent (Neville Price FSB pers. comm.).

Any meat processor or harvester found to be in breach of these controls will suffer disciplinary action, including potential loss of licence as regulated by DPIPW, thus eliminating them as a potential supplier under this WTO.

### **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 wallabies are less gregarious than the larger macropod species. Social relationships within groups of 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 wallaby population.

In addition, the identification of 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 DEWHA approving a Wildlife Trade Management Plan under section 303FO of the EPBC Act submitted by DPIPWE covering wallabies 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 DEWHA by 30 April, an annual report detailing:

- The wallaby density index reported by WMB for the previous year with its position against TP1;
- Total volumes of wallaby products exported for the previous calendar year; and
- Total number of wallaby harvested for the previous calendar year.

This report will detail if any of the regional density indices have fallen below their respective trigger points and the management options to be put in place in consultation with WMB.

## 11. Summary

This WTO:

- Acknowledges that some 900,000–1,000,000 wallabies are currently culled in Tasmania every year and much of the product is wasted.
- Acknowledges that this level of harvest has occurred for an extended time and appears to have no effect on populations.
- Proposes that the product from up to 200,000 wallabies per fiscal year be exportable.
- Puts in place mechanisms to implement adaptive management if wallaby densities decline below conservative levels and to cap exports at the product from 200,000 wallaby per calendar year.
- Documents the extensive licensing, reporting and monitoring controls in place to ensure compliance and establish an auditable supply chain.

This WTO is non-detrimental to the Tasmanian wallaby population since it simply puts in place a mechanism to enable a small percentage of an existing sustainable cull to be exported rather than wasted.

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Appendix 1:

