

Wildlife Trade Operation Application

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

Lenah Game Meats Pty. Ltd.

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

1. Introduction

This Plan puts forward a mechanism to enable export of Bennett's wallaby (*Macropus rufogriseus rufogriseus*) skins from mainland 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 skins from Tasmania to be exported to overseas markets.

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 Bennett's wallaby population.

This WTO allows for the export of 30,000 Bennett's wallaby skins annually. This is within the level of the current commercial take in Tasmania which appears to have had no impact on the population (see section 4).

A large number of Bennett's wallabies harvested under crop-protection permit in Tasmania do not enter the commercial trade. Since 2002, the non-commercial take of Bennett's wallaby has averaged approximately 318,000 annually (WMB, unpublished data). This level of harvest has had no impact on wallaby populations (Figure 1) and has been shown to be sustainable in all management regions at this level. The current commercial harvest only represents approximately 10% of the total number of Bennett's wallabies taken annually in Tasmania. This WTO simply seeks to allow skins from this small percentage of the total state-wide annual take, which is currently being sustainably harvested, to be exported and thus it can be considered small scale.

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 the export of skins from animals processed commercially for domestic meat markets and irrespective of the existence of an export skin market.

As discussed above, there already exists a small-scale industry in Tasmania processing Bennett's wallaby for domestic meat markets. Almost all of the skins from these animals are discarded as waste for want of any viable domestic market for this product. Bennett's wallaby skins do not make very good leather since the skin surface is generally highly scratched from

*Where used in this Plan to indicate the region covered by this Plan, 'Tasmania' shall be taken to mean that part of the State not including King Island, Flinders Island and the other Bass Strait islands.

fences and fighting. They do however make a very useable fur product. Unfortunately for Tasmanian wallaby producers, 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. This WTO seeks to enable LGM to export the skins produced by the Tasmanian wallaby meat industry and thus turn the industry's waste product into a valuable commodity. The WTO's intent is not to increase the commercial demand for Bennett's wallaby and indeed it has in place mechanisms to prevent this. The Plan simply seeks to turn a waste of a raw material which currently constitutes land fill into a valuable export and sustainable resource.

Bennett's wallaby 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).

Bennett's wallaby are listed as partly protected wildlife under Schedule 4 of the *Wildlife Regulations 1999* 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 assisting to develop this WTO, the DPIPWE acknowledges its responsibility in monitoring Tasmania's Bennett's wallaby population through the undertaking of annual spotlight surveys (Section 5), 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 management plan

This WTO lays out a mechanism by which an auditable process can ensure that wallaby skins from animals processed for domestic meat markets 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.

Bennett's wallaby 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 wallaby from private land at night with the aid of a spotlight, the landowner must have a current crop protection permit issued by the DPIPWE. An example is given at Appendix 1.

3.2 Source of skins.

All skins for export will be sourced only from animals already 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 laid out at Section 6.

3.3 Method of Harvest.

Animals will be taken only by harvesters licensed by the WMB and accredited by the Tasmanian Skills Institute (TSI). In-field assessments are conducted by FSB staff under TSI's banner via a Memorandum of Understanding. An example of a commercial harvester's licence is shown in Appendix 2. FSB requires that animals entering the commercial trade must be taken according to the *Animal Welfare Standard for the Hunting of Wallabies in Tasmania* (Appendix 5) and must be brain-shot. This is regulated by FSB through regular audits of processing premises (bi-annually) 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 from Tasmania will be set at a maximum of 30,000. This figure is below the average commercial harvest and will ensure that the export of skins will not drive the commercial harvest.

4. Impact on the harvested species

Wallaby have been commercially harvested for domestic purposes on mainland Tasmania at rates of 30-40,000/year for a number of years (FSB pers. comm. 2009). 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.

The WTO has in place mechanisms to ensure that if wallaby densities fall below very conservatively set trigger points, the exports of skins will cease. This WTO also has in place mechanisms to ensure that if the number of wallabies processed dramatically increases, exports of skins will also cease. The trigger point mechanisms are laid out 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.

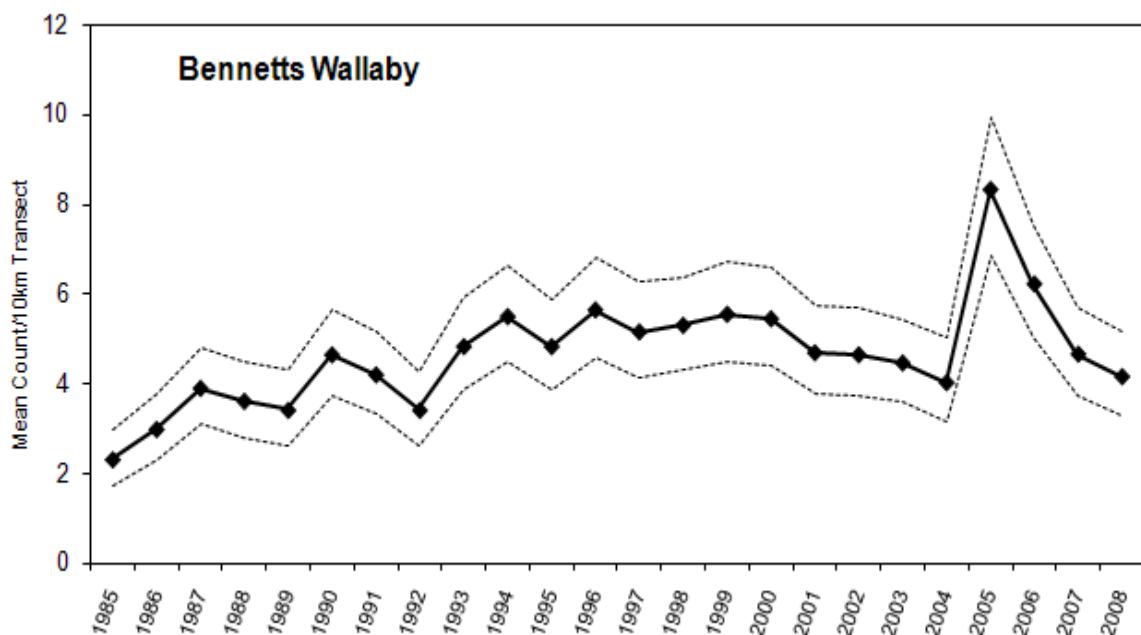


Figure 1: Population trends for Bennett's wallabies in Tasmania for the period 1985-2008. Solid line represents the mean count and dotted lines represent the standard error.

5. Monitoring and assessment

5.1 Monitoring of Wallaby Populations.

Monitoring of trends in populations of Bennett's 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; Appendix 4) 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. In order to allow for long term trends to be examined without bias from the introduction of new survey routes, only those 132 routes surveyed since 1985 are used in examining historical trends prior to 2002 (42 prior to 1985). Given the smaller sample size, results from estimates of historical data may not be directly comparable to the 2002 data onwards, however it does give a very good indication of trends in wallaby populations over time.

Data is collected and reported on a regional basis. Tasmania is divided into 5 regions, one of which is the far 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 survey year is determined by the timing of the first survey (e.g. for surveys undertaken in November 2007 and January 2008, the survey year would be 2007).

The results obtained by this method should be regarded as a repeatable *index* of population density rather than an estimate of total population size. Reviews of survey method, such as frequency of monitoring and monitoring protocols, may be conducted in the future.

Prior to the change in methodology, survey results were recorded as the average number of wallabies seen per 10 km transect. DPIPWE is aiming to shortly develop conversion factors that will allow density figures to be estimated for earlier years. DPIPWE has not converted the 1985 – 2001 survey data to a density index and all data in Figure 1 are recorded as the average number of wallabies seen per 10 km transect in order to enable comparison between years.

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.

As with all scientific data, these density figures contain an element of uncertainty. For this reason, these densities cannot be easily extrapolated into estimates of absolute population size. However, such estimates of absolute 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 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 even in the face of the existing commercial harvest. This population stability is particularly apparent over the past decade and even prior to that any

variation could not be considered more than would occur due to normal population fluctuation in response to seasonal changes.

The density indices for Bennett’s wallabies (as determined from spotlight surveys conducted in 2008) currently range from **8.0 to 41.9 wallabies/km²** across mainland Tasmania (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 FSB, on the number of wallaby they process. This reporting process is under review and may change during the life of this WTO (FSB pers. comm. August 2009).

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 the number of skins they purchase and from whom. All skins retained for trading must be presented to WMB for royalty payment and stamped within 28 days of purchase or prior to export from Tasmania, whichever is sooner.

All skin exports must be accompanied by permits issued by both WMB and the Australian Government Department of the Environment, Water, Heritage and the Arts (DEWHA).

5.2.2 Verification.

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

Supply Verification Chart			
Supply Link	Permits Required	Reporting Required	Verification available
Private property	Crop Protection Permit	Annual return to WMB	
Licensed harvesters	WMB Commercial Wallaby licence	monthly return to WMB	
	FSB accreditation		annual reassessment against Welfare Code
Licensed meat premises	FSB licence	monthly returns to FSB	}
	WMB Skin Dealers License.	monthly returns to WMB	} collate
			} to
			} ensure all
Lenah Game Meats	WMB Skin Dealers License.	monthly returns to WMB	} data
		Monthly royalty payments to WMB	} matches
		annual report on Trigger Points (monitoring results) due by end of April	
Export	WMB Export permit and DEWHA permit	DEWHA export permit acquittals	

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

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. An example of the reporting form is at Appendix 3. 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 kept for trade to be stamped and a royalty paid. The reports can be collated by WMB to verify that all skins sourced by LGM are sourced from licensed premises.

Skins 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 DEWHA 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.

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 (refer to Appendix 4 for a description of the monitoring method). 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 due to its isolation.

Trigger points for each region, based on the density index supplied by WMB, have been set and will be fixed for the life of this WTO should it be approved (see Table 2). Trigger points are set at 33% below the average density index for the years 2002-2008 for each region. WMB will supply annual density index figures to LGM by end of the March following the survey year.

Region	2002	2003	2004	2006	2007	2008	Avg.	Trigger point (33% below average)
Northwest	14.9	15.6	7.1	16.3	13.8	8.6	12.7	8.4
Northeast	28.6	23.9	25.4	26.8	35.1	31.6	28.6	18.9
Central	35.7	33.3	48.8	58.7	35.3	41.9	42.3	27.9
Southeast	20.4	15.5	37.1	33.8	39.7	26.2	28.8	19.0

Table 2: Density Index Figures for Bennett's Wallabies

A reduction in density in any region to a density below the trigger point will trigger a stop to skin retention for export in that region for the remainder of that year, effective from 30 April.

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. LGM must include an outline of these procedures in its annual report (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.

NB: the calculation of the long run average and trigger points do not include data from 2005. Estimates obtained in that year were extremely high because the standardised survey methodology was not followed (WMB pers. comm.). The WMB has put in place training measures for survey observers to ensure that this does not happen again.

Below shows a worked example of how this would apply:

In 2008 the density in the Northwest region was 8.6. The long run average to 2008 shown above is 12.7. The trigger point for this region is 8.4. The density index is above that listed in Table 2, therefore the trigger point is not exceeded and exports can continue.

These trigger point densities still reflect an abundant species.

6.1.2 Trigger Point Two (TP2).

LGM will monitor the total number of Bennett's wallaby skins they export each calendar year. If this number reaches 30,000, LGM will immediately notify DEWHA 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 Regulations 1999*. 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 13 of the *Wildlife Regulations 1999* 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 only to licensed meat processors or their agents.

Permits are required from both DPIPW and DEWHA 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 DEWHA within 2 weeks of exports occurring. Subsequent applications for export permits will be denied if acquittals are not received. DEWHA is able to monitor the cumulative export over the calendar year through receipt of acquittals and has internal procedures in place which ensure that no further export permits are issued if the total export of skins in a calendar year reaches 30,000.

WMB has a team of six full-time 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 5. 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 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*. An example of a Commercial Wallaby Hunting Licence is shown in Appendix 2.

The use of shotguns and/or dogs is not permitted by DPIPWE 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 twice a year by FSB with a proviso of unannounced visits if deemed necessary. 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% (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 DPIPWE, thus eliminating them as a potential skin 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 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 DEWHA approving a Wildlife Trade Management Plan under section 303FO of the EPBC Act submitted by DPIPWE 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 DEWHA 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 exported for the previous calendar year
- Total number of wallaby skins harvested 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 should outline the procedures it has put in place to ensure that skins harvested from the closed region will not be exported.

11. Summary

This WTO:

- Acknowledges that some 30-40,000 wallaby are currently commercially harvested in Tasmania every year and the skins are largely wasted.
- Acknowledges that this level of harvest has occurred for an extended time and appears to have no effect on populations.

- Proposes that up to 30,000 skins per fiscal year be exportable.
- Puts in place mechanisms to stop exports if wallaby densities decline below conservative levels or if exports reach 30,000 skins 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 Bennett's wallaby population since it simply puts in place a mechanism to enable skins from an existing, sustainable harvest to be exported rather than wasted.

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