Buru (Eastern Grey Kangaroo) Draft Controlled Native Species Management Plan 2025

Consultation Report

ACT Government

Acknowledgement of Country

The ACT Government recognises the Ngunnawal people as Traditional Custodians of the ACT and surrounding region. The Government acknowledges that other people and families also have a traditional connection to the lands of the ACT and region, and we respect this connection to Country.

We respect the Aboriginal and Torres Strait Islander people, particularly our Aboriginal and Torres Strait Islander staff, and their continuing culture and contribution they make to the Canberra region and the life of our city.

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Introduction

An ACT Management Plan has been in existence for Eastern Grey Kangaroos since 2010. The original plan was reviewed and replaced with the Eastern Grey Kangaroo: Controlled Native Species Management Plan (2017), which reflected the declaration of Eastern Grey Kangaroos as a 'controlled native species' under the Nature Conservation Act 2014 and updated scientific advancements, management outcomes and community expectations. In March 2024, the 2017 Plan was independently reviewed by Professor Sarah Legge and 35 recommendations were proposed. The Buru (Eastern Grey Kangaroo): Draft Controlled Native Species Management Plan 2025 (Draft Plan) was developed in October 2025 to incorporate the review recommendations. On 7 November 2025, the Conservator of Flora and Fauna (the Conservator) released the Buru Draft Plan for public comment for six weeks until 18 December 2025.

There were 244 unique submissions received by the Conservator and three repeat submissions. Of the 244 unique submissions:

- 11 submissions supported the Draft Plan;
- 2 submissions supported aspects of the Draft Plan with concerns for others; and
- 231 submissions opposed the Draft Plan, of these, 207 submissions were fully or predominantly based on a predetermined template.

Submissions were received from individuals (226), community and non-government organisations (16), a government agency (1) and a political party (1).

The Draft Plan has been revised after taking these submissions into consideration.

Summary of submission issues

The submissions were detailed, well considered and represented a broad spectrum of the community. Despite this diversity, there were commonalities within the responses and they can be considered and summarised within broad themes.

The majority of changes made to the plan in response to submissions involved modification of wording to more clearly articulate or develop existing information and purpose. Further changes included additional explanation of linkages between Plan sections and strengthening of performance indicators.

The summary of each key issue, the consideration and resulting amendment are detailed below, with specific or substantial additions highlighted in *italics*. In addition, the text throughout the whole Plan has been reviewed and edits made to improve clarity and flow.

Grassy Ecosystem Management and Conservation

Most submissions that considered the Draft Plan's primary goals of maintaining Buru populations as a component of grassy ecosystems, while minimising any negative impact, were supportive of the objective. Some concerns were raised over the link between kangaroo management, threatened species and grassy ecosystem conservation. These highlighted the impact of other causes such as habitat fragmentation, urban encroachment and past land management practices. Other comments that acknowledged the link instead recommended alternative ecosystem health indicators be considered (e.g. floral compositional data), integration of additional data sources and use of visual tools to strengthen communication. There was support for the recognition and integration of complementary management tools

and a request to emphasise the conservation values and management on land outside formal conservation areas. There was also a request to include additional detail about the associated management plans listed in the Draft Plan and the evaluations of Buru management that have been undertaken since 2017.

Plan response and amendments

The Plan acknowledges that lowland grassy ecosystems have been impacted by various factors and moderating Buru grazing is one of several land management programs undertaken in these ecosystems. The recent review of the conservation culling program has shown that the program is effective at maintaining Buru populations at densities close to their targets and maintaining grass height within the desired range. The effects on threatened species is currently under review and will be assessed as part of the program evaluation in 2028. Additional text has been included to highlight that *plant and animal biodiversity, including threatened species will be included in the conservation cull evaluation*. The Plan also encourages further research to address knowledge gaps related to Buru and grassy ecosystems. A *list of reports published since the 2017 Plan that evaluate the ACT's approach to Buru management* has been added.

The Plan will continue to use the grass height safe operating environment as a surrogate for grassy ecosystem health, as local research has shown that this intermediate level of grass height provides the best biodiversity benefits. The terminology however has been changed to *Optimal Grass Height Range* and *grass height or grass structure* is included in all references to heterogeneity. To emphasise the role of complementary biomass management tools, additional text has been included to highlight that these tools are *also important for managing grassy layer biomass and structure to complement the continuous grazing by Buru*. Requests for visual tools to strengthen communication will be considered for inclusion on the ACT Government website and additional text to highlight the *conservation values of rural lands and clarify the process for applying to undertake Buru management* has been added. *A summary of the content of each of the associated management plans listed in the plan* has been added.

One Welfare

A number of submissions that in principle reject the need for culling of Buru questioned the application of the One Welfare Framework and feel that the intrinsic value of Buru is not considered.

Plan response and amendments

The intrinsic value of Buru is built into the Plan's primary goal of maintaining populations of Buru in the ACT, however an additional statement about the *intrinsic value of Buru* has been included to further highlight this goal. One Welfare and the International Principles of Ethical Wildlife Control are used to consider Buru, the environment, other species and humans within the same framework. This decision process aims to maximise the welfare outcomes for the most species. It does result in a decision to humanely manage a common species (alongside other management activities), to support the welfare of other species (including threatened species) and promote overall ecosystem health. Populations of Buru are retained as important components of grassy ecosystems. To improve clarity, additional information about the *decision process for managing Buru and the consequences of not managing* have been included. Also, further detail to highlight *welfare impacts to threatened species* when grassy ecosystems are in poor ecological condition has been added.

Scientific evidence

Some submissions question the scientific validity and accuracy of Buru survey methods and believe the resulting density estimates are inaccurate. Some also felt past reviews and research were not independent and provided a biased interpretation of the conservation cull, due mainly because the of the association between researchers and ACT Government funding. Other submissions however, commended the depth and quality of scientific research that is directing the management of Buru.

Plan response and amendments

The management of Buru in the ACT is informed by a large body of research, regular monitoring and review. Evidence-based management decisions related to Buru management in the ACT are based on a wide variety of scientific publications, monitoring and research data, and modelling. Independent sources are quoted and explained throughout the plan. In addition, much of the research undertaken or funded by the ACT Government has been anonymously peer reviewed before publication. Independent reviews of Buru management in the ACT have found the population estimation methods used are appropriate. The Plan promotes continued cooperation with research institutions in the development of new or improved management methods allowing the review and refinement of Buru population methods in accordance with new research and technological advancements. A new Activity *"Review and refine Buru population and vegetation monitoring methods in response to new research or technological advancements"* has been added to highlight this outcome.

Managing Buru populations

There was commendation of the Plan's ongoing commitment to manage Buru as part of ACT grassy ecosystem fauna and the use of conservation culling, fertility control and complementary management activities to minimise negative impacts of high Buru densities. Submissions that opposed culling however, expressed concerns that Buru were being viewed as a pest and the cause of grassy ecosystem decline from habitat fragmentation from past land management and urban expansion was ignored in the Plan. There were also recommendations for the Plan to focus on ecological restoration through non-lethal approaches that promote coexistence and not eradication of Buru. Others believed that there were occasions when the purpose of culling in nature reserves was for development or economic reasons, not conservation.

In relation to the population dynamics of Buru, some submissions claim that unsustainable population increases do not occur and that Buru reproductive physiology and other natural population regulators are sufficient to maintain ecologically appropriate densities. Other submissions considered the reintroduction of predators would be appropriate. There was also concern expressed for the social and behavioural impacts of repeated culling on Buru individuals and populations.

Plan response and amendments

The Plan aims to maintain populations of Buru as an important component of the ACT environment and does not consider Buru a pest nor aim to eradicate Buru. However, the Plan acknowledges that in some situations high density Buru populations can have negative impacts and humane, evidence-based management is required. The Plan includes non-lethal management approaches such as fertility control, fencing and placing coarse woody debris or rocks to protect key areas from grazing. However, these techniques are not suitable for broadscale management. The approach to management in the Plan aims to reduce the total number of animals culled, particularly by investment in fertility control research and more

frequent, smaller culls. The ACT Government conservation culling program is undertaken in conservation areas and no Buru have been culled for the purpose of urban development.

The Plan describes the population dynamics of Eastern Grey Kangaroo populations in temperate environments and highlights the high fecundity even in drought years. Unlike their more arid relatives, their reproduction is not responsive to environmental conditions, so populations are limited by predation and starvation. Past *evidence of poor body condition within the ACT Buru populations* has been included in the Plan.

Recent research has been undertaken in ACT sites to investigate the social, behavioural and physiological impacts of culling on Buru. This research did not find an increase in stress hormones or a change in behaviour that would indicate increased stress in kangaroos remaining in the population after culling. *This research has been noted in the Plan.*

Reintroducing predators, such as Waragul as a method for controlling Buru populations is not practical on rural properties due to the predation risk to livestock. This is also not a practical method for urban nature reserves in and around Canberra because these areas are not large enough to accommodate Waragul populations and there is potential for negative interactions with humans and domestic animals. Additional text to describe why *Waragul reintroduction will not be undertaken in lowland nature reserves and rural land* has been added to the Plan.

Animal welfare and culling

Submissions concerned with animal welfare issues were predominantly from those ethically opposed to culling. In the advent that culling would continue, further concerns were raised about culling procedures, shooter competency and testing frequency and the humaneness of killing females with pouch young. Recommendations for more independent veterinary audits were also made and feedback of audit recommendations for shooters.

Plan response and amendments

As mentioned above, the Plan acknowledges in some situations high density Buru populations can have negative impacts, such as decline in grassy ecosystem condition and Buru starvation, and humane, evidence-based management is required. The Plan outlines the ACT Government's policies related to Buru management techniques, which has assessed that shooting is the most humane and target specific population management tool currently available. Shooting is undertaken in accordance with the National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Non-commercial Purposes which is incorporated into ACT law under the *Animal Welfare Act 1992*. The revision of the shooter competency re-testing requirements from every 2-years to every 3-years is in line with Recommendation 6.5 of the Independent Review of the 2017 Eastern Grey Kangaroo Controlled Native Species Management Plan. The adoption of this recommendation recognizes that the skills and equipment required to pass the test once developed and obtained are relatively enduring and less regular testing of individuals will not compromise animal welfare outcomes.

To monitor welfare and compliance, the Plan includes audits to assess compliance with the Code of Practice and will *expand the involvement of ACT Government veterinarians in the planning and auditing of the conservation culling program*. The communication of audit results was also clarified to highlight that *shooters will be informed about recommendations resulting from audits and compliance with these will be assessed in future audits.*

The ACT also enforces a culling season which is designed to avoid the time of year when young aged 8 to 12 months old are most prevalent. Young in this age bracket are deemed to be in the

animal welfare age of concern because they are at risk of orphaning during culling activities because they are mobile enough to escape the shooters if the mother is shot and have a high milk demand.

Information describing that *shooting is preferred over capture-based methods for welfare reasons* has also been included.

Conservation culling and fertility control program

The conservation culling and fertility control programs outlined in the Plan were supported by some submissions and they encouraged ongoing research and refinement. Other submissions were concerned with the transparency and sharing of culling data (particularly the number of furred and unfurred pouch young) and the impact of culling and fertility control on the genetic integrity of populations. There were calls for the expansion of the fertility control program by some but concerns over the impact on the individual by others. The current timing of the Conservation Management Advice Reports was also questioned and improved wording of the Conservation Culling Calculator was suggested.

Plan response and amendments

A breakdown of the number of furred and unfurred pouch young that are humanely killed as part of the ACT Government conservation culling program is routinely collected during the program and *will be published online annually*. The genetic integrity of Buru populations is not reduced by Buru management in ACT nature reserves, as culling is undertaken non-selectively and fertility control is not applied to every female. Concerns over the use of fertility control are addressed through research on the behaviour and health of Buru treated with fertility control and *inclusion of these assessments in the fertility control effectiveness review* has been added. The Plan does promote the expansion of the fertility control program, however contraceptive methods are best implemented in conjunction with culling and are suited to small, discrete populations. The current use of GonaCon in ACT reserves is expected to reduce but not eliminate the need for culling.

Other updates within the Plan include *online publication of the Conservation Advice Report when the conservation cull is announced* and refinement of the *Conservation Culling Calculator wording.*

Social impact

Submissions overwhelmingly supported the incorporation of Traditional Custodian values and knowledge into current management. There were concerns expressed however, about whether the use of the name “Buru” was appropriate, whether culling was culturally insensitive and if engagement was tokenistic. Some submissions also believed community members who ethically oppose the conservation culling are effectively excluded from consideration. These submissions described experiencing personal insult and distress as a consequence of the culling. Another issue highlighted was the role of Buru in recreation and tourism. Suggestions included expansion of organised recreational events and promotion.

Plan response and amendments

The plan acknowledges the cultural significance of Buru to Traditional Custodians and working towards Traditional Custodian implementation of values and knowledge in Buru management programs is prioritised. The use of the Ngunnawal name ‘Buru’ throughout the plan has been endorsed by the Traditional Custodian Engagement team. The text in the Plan has been reviewed to ensure references to Traditional Custodians and the Ngunnawal community aligns with the ACT Government protocol. To strengthen the Plan’s commitment to culturally

appropriate information exchange, an additional Activity has been added to *highlight that the activities agreed to in the meetings with Traditional Custodians will be implemented during the life of the plan*.

The 2024 review and the Draft Plan engaged directly with a variety of key stakeholders, including those that are known to oppose Buru culling. *Results from a community survey conducted in October 2025 have been added to the Plan.* Results from this engagement support other community surveys that demonstrate the majority of respondents support Buru management. The Plan commits to further surveys to gauge community expectations and support throughout the life of the Plan. The ACT Government acknowledges that culling Buru is a sensitive issue, and some members of the community find it ethically unacceptable and experience trauma. Decisions related to managing Buru consider One Welfare and the International Principles of Ethical Wildlife Control, and are supported by research, monitoring and regular review and the ACT Government enforces various measures so that culling meets high animal welfare standards.

The ACT Government manages nature reserves and national parks to protect biodiversity and provide natural areas for residents and visitors to enjoy, largely in a self-guided capacity. Information and education material about the natural environment, conservation activities and Buru and their management is provided by onsite signage, the ACT Government website and social media. Resources for supporting other ecotourism ventures are unavailable.

Hand rearing, treatment and translocation

Some submissions were critical of the policy not to allow ACT based rehabilitation and release of Buru and called for an increase the number of orphaned Buru young licensed to be transferred to NSW and live publication of numbers transferred to NSW. These submissions also requested the ban on translocation to be reversed and euthanasia permissions for wildlife carers when attending vehicle collision incidents.

Plan response and amendments

The reasons the ACT does not issue licences for the rehabilitation and release of Buru including pouch young or undertake translocations are outlined within the Plan. Any change to the licence which allows Buru young to be transferred to NSW is outside the scope of this plan and would need to be negotiated by the licence holder directly with the ACT Government. A live tally of the number of Buru young transferred to NSW will not be established because information about individual licences is not published for privacy reasons. Extending euthanasia permissions to wildlife carers would involve increased regulation and consideration of various safety, legislative, financial and resourcing factors and is beyond the scope of this Plan.

Rural culling program

Submissions concerned with the rural culling program recommended a greater level of regulation, public reporting (including age and sex statistics), monitoring and independent auditing. Several submissions also encouraged greater support for landholders that included incentives to promote coexistence using non-lethal land management approaches.

Plan response and amendments

The ACT Government has a regulatory role in the rural culling program, the decision to manage Buru and implementation of management on rural lands is the responsibility of the rural landholder. Changes to wording in the Plan have been made to reflect the *ACT Government's regulatory role in the rural culling program* in the relevant outcome and activities. The ACT

Government does not publish annual information from programs managed by other landholders and rural cull authorisation holders are not currently asked to report on sex or age breakdown. The Plan outlines the *development and delivery of a regulatory monitoring program for the rural cull in consultation with landholders to support ongoing animal welfare assurance and continuous improvement.* This monitoring will be undertaken by ACT Government staff who are independent of the rural culling activities. Annual reports related to the rural culling program will remain internal for privacy reasons.

The ACT Government has previously supported some landholders to construct kangaroo fencing on their properties via financial grants. Similar opportunities may arise in future and be suited for small, discrete sites or particular sensitive areas within a site. Shooting remains the most effective tool for larger connected landscapes typical of most rural properties in the ACT.

Vehicle collisions and mitigation measures

Submissions that addressed issues around vehicle collision had a strong focus on increasing safe crossing infrastructure and collision mitigation measures for new and upgraded roads, with an emphasis on collision hotspots. Expansion and increased capacity of the Urban Wildlife Team was also recommended and publication of response times to reported collisions requested.

Plan response and amendments

The Plan includes actions to consider Buru collision mitigation measures for new and upgraded roads. There are many factors that may prevent these measures from being installed, including the location of the road and the specific road design features. As such, retaining the wording 'considered' is appropriate over suggestions in the submissions to make these mandatory.

It is important that collision mitigation measures are considered and implemented in a strategic way across the ACT. The Plan outlines that a consultant will be engaged to develop a short- and long-term strategic plan for implementing and trialing new mitigation measures. Monitoring the success of these measures has been emphasised in the Plan with wording changed to *highlight that monitoring of the mitigation measures will be included in the consultant's report about reducing vehicle collisions with Buru in the ACT*.

The Urban Wildlife Team is resourced with *at least one ranger 24 hours a day, 365 days a year*. Current resourcing only allows for one on-call ranger outside business hours. Options for growing this team will be investigated regularly but would require reallocation of funds from other Parks and Conservation Service programs. The Urban Wildlife Team respond to reported incidences as a priority. Response times are influenced by a range of variables within and outside of the Rangers control. Publishing response times is therefore not currently considered appropriate.

Development and planning

Some submissions expressed concerns over the lack of consideration and integration of habitat connectivity and Buru displacement in new urban development planning. These submissions also called for any data on culling related to development activities to be published.

Plan response and amendments

Maintaining connectivity and including wildlife road crossing features is considered as part of the planning process in the ACT (for example, see the ACT Biodiversity Sensitive Urban Design Guide (BSUD)). To provide clarity around this subject *reference to the BSUD* has been included in Plan. Policies related to Buru management on development sites intend to provide culling as

an option in cases where not culling would be a worse welfare outcome for Buru or there are ecological impacts. To date, no Buru have been culled for development purposes. Information about individual authorisations or licences to cull are not provided publicly for privacy reasons.

Use of carcasses

Some submissions expressed concern over the use of Buru carcasses. Some were critical of wasting a resource, while others strongly oppose any utilisation. A particular concern was the use of Buru carcasses for making 1080 baits for predator control programs.

Plan response and amendments

The Plan highlights that ACT has no commercial harvesting of Buru. The Plan encourages investigation into the use carcasses from culling programs in the ACT to benefit the environment and the community. Any use of carcasses resulting from conservation culling, however, will be gifted, not sold. Additional wording has been added to highlight that options *for returning nutrients from culled carcasses to ecosystems will be considered for further investigation*.

The use of Buru carcasses for making poison baits supports an important land management program to protect nearby rural properties. This use reduces waste to landfill and frees up funding that can be used for other land management or conservation programs. The Plan will continue to support the use of Buru carcass for this purpose.