

Wildlife Trade Operation Application

Management Plan for the Commercial Harvest and Export of Wallaby from Tasmania

Lenah Game Meats Pty. Ltd.

1. Introduction

This plan puts forward a mechanism to enable export of wallaby products from Tasmania. It aims to satisfy the requirements for a small-scale, *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 plan to be exported to overseas markets. For the purpose of this plan:

- 1) 'wallaby' refers to both *Macropus rufogriseus* (Bennetts wallaby) and *Thylogale billardierii* (rufus wallaby), and
- 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. Importantly it represents only a small proportion of the total take under Property Protection Permits.

This WTO allows for the export of product from up to 200,000 wallabies annually. This is less than 40% of the long-term average take of wallaby for crop protection purposes in Tasmania. This long-term harvest appears to have had no impact on the sustainability of the population (Section 4).

Since 2004, the take of wallaby in Tasmania for crop protection purposes has averaged over 500,000 annually (Unpublished Data, NRE Tasmania). This level of take has had no impact on wallaby populations (Figures 1 & 2) and has been shown to be sustainable in all management regions at this level. The proposed commercial utilisation of this take only represents 40% of the total number of wallabies currently taken annually in Tasmania. This WTO simply seeks to divert a small percentage of the annual cull to commercial use and thus it can be considered small scale. It must be noted that the expectation is not that the over-all State kill of wallaby will increase because 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.

The WTO's intent is not to increase the overall take of wallaby and indeed it has in place a mechanism to prevent this. Wallabies are currently culled under property protection permit in very large numbers as agricultural damage mitigation. This plan simply seeks to turn an existing waste of a raw material, which are often currently left to rot, into a valuable export and sustainable resource.

Wallaby are harvested and processed in Tasmania for human consumption and pet food under the control of the *Primary Produce Safety Act 2011* and the *Nature Conservation Act 2002*. Meat processing premises and harvesters are registered and licensed by the Food Safety Branch (FSB) and Game Services Tasmania (GST) respectively of the Department of Natural Resources and Environment (NRE).

Wallaby are listed as Partly Protected wildlife under Schedule 8 of the *Nature Conservation (Wildlife) Regulations 2021* of the *Nature Conservation Act 2002*. As such, they can only be taken for commercial purposes by licensed hunters and only from properties which have been issued property protection permits for wallaby by NRE. Such permits are only issued when evidence is supplied by the landowners of economic loss due to wallaby. Hunters must have a Commercial Purposes Licence, and they are permitted to sell wallaby to meat processors who hold a Commercial Wildlife Traders Licence.

NRE monitors Tasmania's wallaby population through the undertaking of annual spotlight surveys (Section 5), the results of which are available to Lenah Game Meats (LGM) for reporting to the Commonwealth as required under Section 10. NRE will also ensure that the activities undertaken under this WTO comply with the *Nature Conservation (Wildlife) Regulations 2021* 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 plan 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 are wholly protected on land reserved as State Reserve, National Park or other conservation reserves under the *National Parks and Reserves Management Act 2002*. Approximately 49% of the land area of Tasmania is contained in State Reserve, National Park or other conservation reserves and much of this area is suitable wallaby habitat. The distribution of reserves covers all regions of Tasmania, and consequently a broad range of habitat types. In addition, much of the population outside of formal reserves is indirectly protected from culling because of land use restrictions, proximity to residential property and urban/suburban areas, difficult terrain, dense bush or lack of access for hunters.

Under this management plan, the taking of wallaby that can be utilised commercially may be undertaken only on or adjacent to land used for primary production, namely land used to produce crops (including plantation timber) and/or pasture.

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 of NRE. Mechanisms to ensure the export will not threaten the abundance of the species across its existing range are in Section 6.

3.3 Method of Harvest.

Animals will be taken only by harvesters holding a current Commercial Purposes Licence. FSB requires that animals entering the commercial meat trade must be taken by accredited Game Meat Harvesters and in accordance with the *National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes 2020* (<https://agrifutures.com.au/resource/the-national-code-of-practice-for-the-humane-shooting-of-kangaroos-and-wallabies-for-commercial-purposes/>) and must be brain-shot. This is regulated by FSB through regular audits of processing premises 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 per annum. The average take of wallaby over the past twenty years has exceeded 500,000 per annum (Unpublished Data, NRE Tasmania). The proposed available commercial quota of 200,000/year is 40% of the average cull.

4. Impact on the harvested species

Wallaby have been commercially harvested and culled under damage mitigation permits for domestic purposes on mainland Tasmania at average rates of 500,000 per year over the past twenty years (Unpublished Data, NRE Tasmania). Wallaby take figures for the years 2019 to 2024 are given in Table 1

Table 1: Reported take of wallaby under Permit (2019-2024)

Year	Number of Property Protection Permits Current	Reported take
2019	2 827	921 962
2020	3 127	876 494
2021	2 945	882 852
2022	2 728	678 840
2023	2 737	528 378
2024	3 118	497,926*

*Preliminary figures only as take returns for reporting period are not complete, (Source: Unpublished Data, NRE Tasmania).

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 Figures 1 and 2. Both species demonstrate long term stability in mean densities.

The WTO has in place mechanisms to ensure the trade facilitated by export does not contribute to a trade that will be detrimental to wallaby populations.

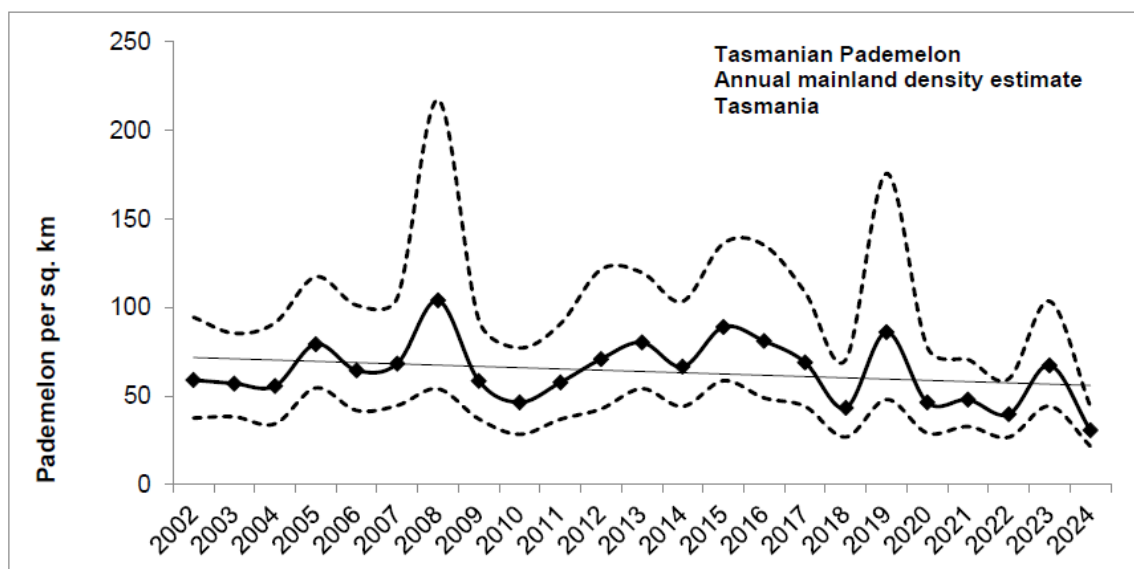


Figure 1: Population trends for Rufus wallabies (Pademelon) in Tasmania for the period 2002-2024. Solid line represents the mean count, and dotted lines represent the standard error. Source NRET (2025).

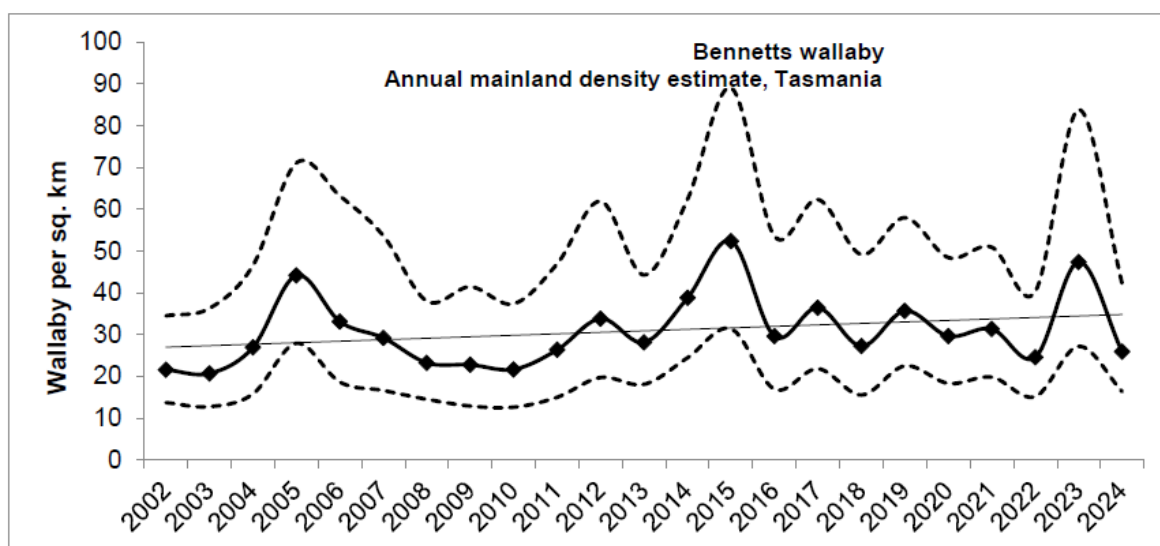


Figure 2: Population trends for Bennetts wallabies in Tasmania for the period 2002-2024. Solid line represents the mean count, and dotted lines represent the standard error. Source NRET (2025).

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 NRE. 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 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 172 standard 10 km spotlight survey routes in mainland Tasmania. 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 Southwest 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. NRE is aiming to shortly develop conversion factors that will allow density figures to be estimated for earlier years. NRE 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 to enable comparison between years.

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 Figures 1 and 2 indicate a stable long-term population even in the face of the existing commercial harvest, recreational kill damage mitigation cull and roadkill. 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.

5.2 Monitoring the take

5.2.1 Existing Controls

Under the *Primary Produce Safety Act 2011*, licensed wallaby meat processors in Tasmania can only purchase wallaby from harvesters holding a Commercial Purposes licence. All wallaby meat processors in Tasmania are required as a condition of their Commercial Wildlife Traders Licence, to report the number of wallabies they process.

All skin and meat exports must be accompanied by permits issued by the Australian government Department of Climate Change, Energy, the Environment and Water (DCCEEW).

5.2.2 Verification.

Table 2 charts the extensive licensing, reporting and verification controls in the supply chain.

Supply Verification Chart			
Supply Link	Authority Required	Reporting Required	Verification Available
Private property	Property protection Permit (PPP)	Annual take returns by landholder Quarterly returns by licences harvesters to Game Services Tasmania (GST)	
Licences harvesters	Commercial Purpose Licence	Quarterly return to Game Services Tasmania (GST)	
	FSB Accreditation		Annual re-assessment against Welfare Code
Licensed meat	FSB Licence	Returns to FSB	Collate to ensure all data matches
Processor	Commercial Wildlife Traders Licence	Quarterly returns to Game Services Tasmania (GST)	
Lenah Game Meats	Commercial Wildlife Traders Licence	Quarterly royalty payments to WMB	
		Annual report on Trigger point to DCCEEW	
Export	DCCEEW Export Permit	DCCEEW Export Permit Acquittal	

Table 2: Supply chain controls for the export of wallaby from Tasmania

5.2.2.1: Verification of source of product.

Holders of Commercial Purpose Licences are required by GST to report quarterly numbers of each species taken under Property Protection Permits (PPP) and sold. An example of the reporting form can be found in Appendix 2.

Holders of Commercial Wildlife Traders Licences are required by Game Services Tasmania (GST) to report quarterly numbers of each species purchased from Commercial Purposes Licence holders, processed and sold. An example of the reporting form is at Appendix 2

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 DCCEEW detailing the product in each consignment. Total exports can be cross checked against numbers reported to Game Services Tasmania (GST) as purchased by LGM and retained for trading.

6. Annual Purchase Limit

LGM monitor the total number of wallabies they process for export, reporting quarterly to Game Services Tasmania (GST). If this number reaches 200,000, LGM will immediately notify DCCEEW and no further animals will be harvested for export, or exported, for the balance of that reporting year. This can be cross checked by Game Services Tasmania (GST) from the quarterly reports of wallaby processed submitted by LGM.

7. Compliance

Wallaby management in Tasmania is administered by NRE, under the *Nature Conservation Act 2002* and the *Nature Conservation (Wildlife) Regulations 2021*. Under Schedule 8 of the *Nature Conservation (Wildlife) Regulations 2021*, wallabies are classified as Partly Protected Wildlife throughout Tasmania. As such, they may be taken under the authority of a Property Protection Permit issued under Regulation 34 of the *Nature Conservation (Wildlife) Regulations 2021* on properties where they are causing crop damage. Permits may specify conditions with which the holder of the permit must comply.

For commercial use wallabies taken for crop protection purposes, the commercial shooter must hold a Commercial Purposes Licence, which allows the sale of wallabies taken under the authority of a Property Protection Permit on lands used for primary production.

Commercial wallaby hunters are permitted to sell wallaby carcasses only to the holder of a Commercial Purposes Licence endorsed to process.

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

NRE has a team of four full-time compliance officers whose responsibilities include 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.

It is a condition of a Commercial Purposes licence issued by NRE that wallabies are taken in accordance with the requirements of the *National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes (2020)*, the Code. An example of a Commercial Purpose Licence is shown in Appendix 1.

All holders of Commercial Purposes licences must be appropriately trained and accredited. Persons harvesting for meat must be accredited in accordance with the provisions of the *Primary Produce Safety Act 2011* and the Australian Standard for the Hygienic Production of Game Meat for Human Consumption. All accreditation includes training in the requirements of the Code 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 Code.

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 Code and permit conditions relating to shooting requirements is determined through annual in field audits of all harvesters and is currently at or near 100% (DPIPWE, 2020).

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 NRE, 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 far less socially structured than the larger macropod species. Social relationships within groups of wallabies are highly unstable, the only enduring relationship being between a female and her un-weaned 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 DCCEEW approving a Wildlife Trade Management Plan (WTMP) under section 303FO of the EPBC Act submitted by NRE covering wallaby harvest in Tasmania as a whole.

10. Reports

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

1. Total number of wallabies exported for the previous calendar year, and
2. Total number of wallabies harvested for the previous calendar year.

This report will detail if, given assessments against the annual purchase limit or trigger point, wallaby harvested in the current year will be eligible for export

11. Summary

This WTO:

- Acknowledges that over 500,000 wallabies are currently culled for crop protection purposes 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 the sustainability of wallaby populations.
- Proposes that the product up to 200,000 wallaby per calendar year be exportable.
- Documents the extensive licensing, reporting and monitoring controls in place to ensure compliance and establishes 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.

Bibliography

Calaby, J.H. (1983) Red-Necked Wallaby. In 'Complete Book of Australian Mammals'. (Ed. R. Strahan) p. 186. (Angus and Robertson: Sydney).

Catt, D.C. (1977) The breeding biology of Bennett's wallaby (*Macropus rufogriseus fruticulus*) in South Canterbury, New Zealand. *N.Z. J. Zool.* 4: 401-411.

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Hocking, G.J., and Driessen, M.M. (1992) Tasmanian Spotlight Survey Manual. Department of Parks, Wildlife and Heritage, Hobart.

Johnson, K.A., and Rose, R.W. (1995) Tasmanian Pademelon (*Thylogale billardierii*). In 'The Mammals of Australia'. (Ed. R. Strahan) p. 394. (Reed Books: Chatswood).

Mooney, N.J. and Johnson, K.A. (1979) Methods for the census of wallaby and possum in Tasmania. Unpublished Tasmanian National Parks and Wildlife Service Technical Report.

Morton, S.R. and Burton, T.C. (1973) Observations on the behaviour of the macropodid marsupial *Thylogale billardierii* (Desmarest) in captivity. *Aust. Zool.* 18: 1-14.

NRET (2025) Annual Spotlight Surveys, Tasmania 2024. Nature Conservation Report 25/02. Department of Natural Resources and Environment, Tasmania.

Appendix 1 - Commercial purpose license

Department of Natural Resources and Environment Tasmania
PO Box 46, KINGS MEADOWS TAS 7249
Ph: (03) 1300 292 292
Email: GameServicesTas@nre.tas.gov.au
Web: <https://nre.tas.gov.au/agriculture/game-services-tasmania>



Commercial Purposes Licence

This licence is granted under the authority of Regulation 48 of the *Nature Conservation (Wildlife) Regulations 2021* and pursuant to Regulation 29

Licence no:

This licence authorises the above licence holder to possess and sell or otherwise dispose of the products of the following wildlife:

Brushtail Possum (*Trichosurus vulpecula*) & Fallow Deer (*Dama dama*) & Forester Kangaroo (*Macropus giganteus*) & Bennett's (or Red-necked) Wallaby (*Notamacropus rufogriseus rufogriseus*) & Tasmanian Pademelon (or Rufous Wallaby) (*Thylogale billardierii*)

For the following commercial purpose:

Sale of Carcass

Subject to the following conditions specified in Annex A

This licence is effective from 06/11/2024 and will expire at midnight on 30/06/2025.

Granted by:

Principal Wildlife Management Officer

Delegate of the Secretary for Natural Resources and Environment
Tasmania

Granted Date: 06/11/2024

Appendix 2 - Quarterly reports

Game Services Tasmania Ph: (03) 1300 292 292 Email: GameServicesTas@nre.tas.gov.au					Licence no: [REDACTED]	
Commercial Wildlife Traders Licence Record Form						
The licence holder is required to complete a summary of all transaction records held for products of wildlife sold or otherwise disposed of during each specified three month period, on the forms provided, and return to the Department within 14 days of the end of each period.						
Return Period October - December 01/10/2025 to 31/12/2025				Return due no later than: 14/01/2026		
Purchases						
Number of each species purchased					Product Description (E.g. whole carcass, skin only, fur only)	
*BW	*RW	*BTP	*FK	*FD		
Sales						
Number of each species processed and sold					Product Description (E.g. whole carcass, skin only, fur only)	
*BW	*RW	*BTP	*FK	*FD		
<small>*BW - Bennett's (or Red-necked) Wallaby, *RW - Tasmanian Pademelon (or Rufous Wallaby), *BTP - Brushtail Possum, *FK - Forester Kangaroo, *FD - Fallow Deer</small>						
I, the Holder, declare that: <ul style="list-style-type: none"> - The information provided in this form is true and correct; and - I consent to the collection and use of my personal information in accordance with the Department's Personal Information Protection Policy. 						
Signature: _____				Date: _____		
This form must be completed and returned to the Game Services Tasmania, Department of Natural Resources and Environment Tasmania, PO Box 46, KINGS MEADOWS TAS 7249, no later than the specified return due date for this form.						

Game Services Tasmania Ph: (03) 1300 292 292 Email: GameServicesTas@nre.tas.gov.au					Licence no: [REDACTED]	
Royalty Payment Form						
The holder of a commercial wildlife traders licence must pay a royalty for each deceased animal of a species listed in the table below, that is purchased under the authority of this licence and is intended for sale under the authority of this licence, before selling a product of wildlife of, or other item from, the deceased animal.						
Products of Wildlife				Royalty Payable	Value \$	Total Value \$
*BW	*RW	*BTP	*FK			
				<i>The royalty payable for each deceased animal is [REDACTED] per animal, whether or not the animal is whole or in parts</i>		
<small>*BW - Bennett's (or Red-necked) Wallaby, *RW - Tasmanian Pademelon (or Rufous Wallaby), *BTP - Brushtail Possum, *FK - Forester Kangaroo</small>						
I, the Holder, declare that: <ul style="list-style-type: none"> - The information provided in this form is true and correct; and - I consent to the collection and use of my personal information in accordance with the Department's Personal Information Protection Policy. 						
Signature: _____				Date: _____		
This form must be completed and returned to the Game Services Tasmania, Department of Natural Resources and Environment Tasmania, PO Box 46, KINGS MEADOWS TAS 7249, no later than the specified return due date for this form.						
How to lodge return and pay: In person at any Service Tasmania Shop.					Receipt No: _____	
Service Tasmania Product Code [REDACTED]						