

## **Inquiry into Crocodile Control and Conservation Bill 2025**

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<b>Submitted by:</b>	Community Representation of Crocodiles (CROC QLD)
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<b>Submitter Comments:</b>	

# Submission No. 47 - Form A or variation of Form A

Crocodile Control and Conservation Bill 2025

Sara Sarungallo	Making the submission and your name public
Katie Williams	
	Making the submission public but withholding your name
Clair Knobloch	Making the submission and your name public
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Friday, 28<sup>th</sup> March 2025

**Health, Environment and Innovation Committee**

*Sent via email to: [heic@parliament.qld.gov.au](mailto:heic@parliament.qld.gov.au)*

Dear Committee,

**Submission on Crocodile Control and Conservation Bill 2025**

My name is Amanda French, and I manage C.R.O.C (Community Representation of Crocodiles), a Queensland-based platform comprising professionals from research, scientific, policy, and wildlife education sectors specialising in Saltwater crocodiles, and highlighting community concerns about crocodile conservation with the Australian media.

**Background and Expertise**

Over the past two years, C.R.O.C has actively contributed to Queensland's law reform process, collaborating with Traditional Owners and the Environmental Defenders Office to strengthen penalties for irresponsible human behaviour in crocodile habitats. Our involvement stems from evidence-based analysis showing that the majority of documented crocodile incidents, human behaviour—specifically disregarding safety guidelines—has been the primary contributing factor. We have contributed media commentary and awareness in over 200 Australian media articles and interviews on crocodile conservation since our inception in February 2023.

**Support for Current Government Initiatives**

We commend the Queensland Government for enhancing penalties and redirecting resources toward public education programs that emphasise taking personal responsibility in crocodile habitats. This approach acknowledges the fundamental reality that we cannot modify the behaviour of an apex predator that has evolved over millions of years.

**Concerns Regarding the Proposed Bill**

The focus on crocodile removal and independent crocodile contractor removals in the proposed bill contradicts scientific evidence and traditional knowledge regarding effective safety management. Removing crocodiles from their habitat perpetuates a dangerous misconception that such actions increase public safety, when evidence suggests otherwise.

## **Our Direct Concerns About the Crocodile Control Bill 2025**

- Recent comprehensive research and modelling by Cameron Baker (Charles Darwin University) demonstrates that crocodile culling has no statistically significant impact on reducing attack incidents. The modelling indicates that populations would need to be reduced to critically endangered levels to affect even a single attack statistic—an approach that is neither environmentally responsible nor effective.
- The scientific community is collectively promoting the importance of moving away from crocodile culling, and the need for proactive mitigation strategies in managing human behaviour in crocodile environments
- The "CrocWise" approach represents a more effective, science-based strategy. Investment should prioritise enhancing public awareness about appropriate behaviour in crocodile habitats rather than resource-intensive removal programs with limited safety benefits.
- Saltwater crocodiles in Queensland are still a recovering species, and listed as vulnerable to extinction.
- Our community outreach work with Indigenous Rangers and Traditional Owners reveals significant concerns about existing crocodile management practices. The removal of "problem crocodiles" already impacts the totemic significance of these animals to Traditional Owners. Establishing an independent authority focused on increased removals would further compromise cultural rights and connections to totemic species. And would detract from the existing work, the current environmental regulator (the Department of the Environment, Tourism, Science and Tourism) has been doing to enhance their engagement work with First Nations communities in the crocodile management plan. An independent authority, would not have the current understanding or have undertaken the groundwork the current management authority has been undertaking.

## **Concerns Regarding Evidence-Based Policy and Historical Context**

The political party proposing this Bill has consistently demonstrated a concerning pattern of disregarding scientific evidence in their public communications about crocodile ecology, behaviour, and cultural significance to First Nations peoples. Our consortium of experts has identified that this proposed legislation appears to prioritise crocodile culling and commercial exploitation through farming and egg collection rather than being grounded in conservation science or evidence-based management practices.

Implementation of these measures would undermine decades of scientific research and ecological recovery undertaken in Queensland. The saltwater crocodile population is only now showing signs of recovery from the devastating impacts of culling and trophy hunting that nearly eradicated the species prior to protections established in the 1970s. The scientific community has documented this recovery process extensively, providing clear evidence against returning to management approaches that proved historically detrimental.

Furthermore, the proponents of this Bill have frequently disseminated misinformation that amplifies public fear rather than promoting accurate understanding of crocodile

behaviour. This approach not only contradicts scientific consensus but potentially compromises public safety by diverting attention from evidence-based safety measures that actually protect communities living in crocodile habitats.

We welcome the opportunity to make this submission on the *Crocodile Control and Conservation Bill 2025 (Bill)*.

We would like the opportunity to appear before the Committee in their hearing into this inquiry.

We recommend that the Committee **reject** the passing of the Bill, where the Bill:

- could conflict with Australia's international obligations and existing Commonwealth legislation, particularly by supporting the creation of a crocodile trade scheme which could be in breach of international and federal law requirements;
- subverts Queensland's current legislative and regulatory framework for the management of crocodiles, and would likely authorise unsustainable levels of crocodile harvesting, culling, and farming;
- may increase the risk of dangerous human-crocodile interactions, while causing negative ecological consequences, contrary to what the Bill purports; and
- could unreasonably limit the human right of First Nations Peoples to maintain and enjoy their cultural heritage and spiritual practices, as protected under the *Human Rights Act 2019* (Qld).

### **Conflict with International and Commonwealth Law**

If the Bill were to pass, it could support the creation of a crocodile trade scheme that could breach Australia's international obligations and Commonwealth legislation. We note that where there is a conflict between Commonwealth law and state law, Commonwealth law prevails. This could render parts of the Bill invalid.

The Bill could allow for the unrestricted trade of saltwater crocodiles, where the Bill does not reference any of the laws and guidelines that currently apply to crocodile management in Australia. Crocodiles are a regulated species under the *Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)*. Australia's obligations under CITES are implemented in our domestic law through the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (**EPBC Act**). Contrary to the EPBC Act requirements, the Bill fails to provide for a Wildlife Trade Management Plan, particularly failing to reference the existing Wildlife Trade Management Plan for saltwater crocodiles which adheres to the EPBC Act and other relevant pieces of legislation. The Bill also fails to refer to the federal government's Code of Practice on the Humane Treatment of Wild and Farmed Australian Crocodiles (**Code of Practice**). The Code of Practice lays out a set of best practice guidelines that any Wildlife Trade Management Plan must adhere to.

## Conflict with State Law

The saltwater crocodile is a listed vulnerable species under the *Nature Conservation Act 1992* (Qld) (**NCA**). It is an offence to take or kill a saltwater crocodile unless authorised by the NCA. Authorisations occur when a crocodile is identified as being a danger to humans and is named a 'problem crocodile'. The Bill subverts this by empowering a 'Director' to authorise the taking or killing of *any* crocodile.

The systemic management of crocodiles in Queensland is currently provided through the Queensland Crocodile Management Plan (**QCMP**), which splits up regions of the state into 6 'zones', and outlines how crocodiles are to be managed according to each zone. The Bill aims to override this framework without sufficient explanation or scientific justification. For example, it provides for the creation of 'crocodile sanctuaries' but fails to explain what a 'crocodile sanctuary' would be.

Licensing for the harvesting of crocodile eggs is currently regulated by the Nature Conservation (Estuarine Crocodiles) Conservation Plan 2018 (**Conservation Plan**). The conditions required to grant a licence are stringent and require consideration of the ecological impact of any harvesting activity. The Bill grants the power to issue these licenses to the 'Director', with the simple requirement that persons undertaking harvesting activities complete an unspecified 'egg harvesting safety course'. It therefore runs the risk of permitting a level of egg harvesting that is both unsustainable and potentially dangerous, given the high risk of attacks by nesting mothers. These risks are not outweighed by the economic benefits of large-scale egg harvesting – which the Bill relies on – because egg harvesting in Queensland is unlikely to be commercially viable at any substantial level.

Finally, crocodile culling was outlawed in Queensland in 1974, and since then crocodile populations have rebounded substantially. The Bill proposes the reintroduction of culling practices but lacks a legitimate explanation as to why such a drastic policy reversal would be in the interests of Queenslanders.

## Conflict with the Human Rights Act

Crocodiles are culturally significant to First Nations groups. They are totems that exist in songlines and are part of a broader spiritual connection to Country. Both in its consultation process and in the administrative powers it grants, the Bill has failed to adequately consider the significant cultural impact it would have.

The unrestricted killing or taking of crocodiles will adversely affect the ability of First Nations groups to carry out cultural practices and maintain connections to land. When a dominant male crocodile is removed from a waterway, other male crocodiles from elsewhere will often move to the area to establish it as their territory. This sudden influx of territorial and aggressive crocodiles makes the waterway *more* dangerous to swim and fish in. First Nations groups have advised that this prevents them from collecting food and carrying out cultural practices on Country. This is an unacceptable and unreasonable contravention of a human right, along with being counterproductive to the purported aim of the Bill in creating a safer environment.

## **General Policy Concerns**

Beyond its inconsistencies with the existing legislative regime, the Bill raises a number of general ecological and social concerns:

- The large-scale killing of crocodiles may have negative ecological consequences, due to their roles as ecosystem engineers and indicators of ecosystem health.
- The Bill is not informed by existing codes of practice on crocodile management. There is a significant risk that it would allow for unqualified people to carry out the killing or removal of crocodiles, or the harvesting of their eggs, and therefore put lives in danger. Once again, this plainly contradicts the Bill's objective of reducing crocodile attacks.
- Commercial egg harvesting on a large scale is not viable in Queensland because of a variety of factors, including low nest density and transport difficulties. This is why only 2,700 eggs have been permitted for harvesting in Queensland since 2018.
- The Bill consolidates all crocodile management powers to a sole 'Director' of the proposed 'Queensland Crocodile Authority'. The Director would have the ability to issue licences, decide if a crocodile should be killed or taken, and authorise the establishment of farms. What, then, would become of the existing schemes and institutions which are presently empowered to make these decisions?
- The Bill rests on the false premise that the best way to reduce crocodile attacks is to remove crocodiles from their natural habitat. This position is not informed by science and research. In fact, the best way to reduce the incidence of such attacks is by ensuring Queenslanders are 'Crocwise' when in crocodile territory.

## **Conclusion**

This Bill proposes a scheme of crocodile management that fails to consider the relevant science, underdelivers on its promise of economic benefit, and undermines international, Commonwealth, and state law. Furthermore, it unreasonably infringes on the rights of First Nations peoples, and may counterproductively increase the risk of crocodile attacks. Ultimately, it advances a dangerous narrative that the mass killing and harvesting of crocodiles will make the communities of Far North Queensland safer when it may in fact create more danger.

We recommend the Committee reject the Bill in whole.

Yours sincerely

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Founder

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