

Inquiry into Crocodile Control and Conservation Bill 2025

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Crocodile Conservation and Control Bill
3 April 2025

To: Health, Environment and Innovation Committee
Sent via email to | heic@parliament.qld.gov.au

From: Defend the Wild & Warren Martens (Kunggandji Cultural Custodian)

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Acknowledgement of Country

Defend the Wild acknowledges the Traditional Custodians of the land on which our organisation operates. We pay our respects to all Elders, past, present and emerging, and further pay our respects to First Nations Peoples long surviving connection to Country, their Totem animals, songlines, and sacred culture. We further recognise that Indigenous knowledge and leadership is vital in the pursuit of preserving wildlife and their habitats. Sovereignty has never been ceded - this always was, and always will be Aboriginal land.

About Warren Martens, Kunggandji Traditional Owner

Warren Martens is a Kunggandji Cultural Custodian based in Cairns, North Queensland. Warren is a member of the Queensland Government's crocodile roundtable as the only crocodile Totem connections representative.

The crocodile is an important Totem to Warren and his family, embedded in their belief system.

About Defend the Wild

Defend the Wild exists to advance Australia beyond the widespread lethal management of apex predators by promoting education and holistic non-lethal strategies for addressing human-wildlife conflict.

We are dedicated to the preservation of wildlife and habitats across Australia by:



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- Highlighting the greatest dangers wildlife face, particularly apex predators.
- Supporting the ambitions of Traditional Owners in protecting and managing culturally significant animals and Country.
- Supporting the development of solutions that benefit both rural communities and wildlife, particularly apex predators.
- Highlighting the importance of ethics-centred conservation efforts that respect the integrity of individual animals' lives, while exposing conservation greenwashing that attempts to legitimise unethical industries.

Dear Committee,

We thank you for the opportunity to make this submission on the Crocodile Control and Conservation Bill 2025 (Bill). We would also like to request the opportunity to appear before the Committee in their hearing into this inquiry.

Defend the Wild is a small charity based in Boonah, Queensland. We launched in 2021 with our notable #DropCroc campaign, which examines Australia's factory farming of saltwater crocodiles. In July 2023, the federal government commenced a review of the 14-year-old Code of Practice on the Humane Treatment of Wild and Farmed Australian Crocodiles. The commencement of this review was a direct result of the campaigning efforts of Defend the Wild and our partners.

Through our campaigning for crocodiles, we have partnered with Kunggandji Cultural Custodian, Warren Martens who shares a deep connection to crocodiles and advocates for their humane, culturally appropriate management across Queensland. This submission is a partnership between Defend the Wild and Warren.

In our Defend the Wild's campaigns, we aim to support the self-determination of Aboriginal and Torres Strait Islander people across the country and advocate for Indigenous-led management of wildlife and habitats. In our crocodile protection advocacy, we have partnered with various Queensland-based Traditional Owners, which includes having consultations with Indigenous Land and Sea Rangers on the law reforms that were under consultation in Queensland and management of crocodiles more broadly.

Defend the Wild exists to raise awareness on issues facing culturally significant animals, and does this by elevating the voices of First Nations people, consulting with Traditional Owners



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on conservation strategies with their cultural values and aspirations for managing wildlife, and educating the public and media on the cultural significance of our apex predators.

Throughout our DropCroc campaign, we have extensively outlined the issues surrounding the factory farming of Australia's saltwater crocodiles under the guise of conservation, as well as the harmful consequences of culling crocodiles over coexistence. We firmly believe this Bill will have devastating impacts on Queensland's iconic saltwater crocodiles, which we explore in more detail below.

We urge the Committee to reject this Bill in light of the following facts:

- This Bill could unjustly restrict the rights of First Nations Peoples to preserve and engage in their cultural heritage and spiritual practices, as protected under the Human Rights Act 2019 (QLD).
- The Bill is at direct odds with positive progress being made on crocodile management in Northern Queensland.
- Annual culling may heighten the risk of dangerous human-crocodile interactions and lead to negative ecological consequences, contradicting the claims of this Bill.
- A massive expansion of crocodile farming in Queensland, mirroring the Northern Territory, would have devastating consequences for the state's iconic saltwater crocodiles and their individual welfare.
- This Bill will undermine Queensland's existing legislative and regulatory framework for crocodile management, likely leading to unsustainable levels of harvesting, culling, and farming.

Consultation conducted with Cultural Custodians across Queensland:

In May 2024, Defend the Wild and Warren Martens partnered with Jaru man Donny Imberlong, the Environmental Defenders Officer and Community Representation of Crocodiles to consult with four Indigenous Land and Sea Ranger groups across Far North Queensland. This holistic consultation covered a range of issues relating to the wild and captive management of crocodiles, including farming.

These discussions helped us better understand, from Cultural Custodians perspectives:



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- The cultural significance of crocodiles, including their role as Totems for some Cultural Custodians.
- The lack of consultation around the removal of deemed problem crocodiles from Country.
- The lack of transparency around the conditions crocodiles are kept in on farms, where wild eggs are hatched and raised, and deemed problem crocodiles are removed from the wild and often taken.
- The concern around the isolated conditions in which crocodiles are allowed to be kept on farms.
- Those communities had not been consulted with in relation to the review of the federal Code of Practice review, affecting both farmed and wild crocodiles.

Whilst each group had unique thoughts and perspectives, throughout the consultation process there were a number of threads in relation to safety strategies and management that were consistently highlighted:

- A need for genuine Indigenous-led management of crocodiles.
- A need for increased resourcing and powers of Indigenous rangers to enforce Crocwise behaviour on Country.
- A culturally appropriate and holistic approach to Crocwise education, which is led and delivered by local Cultural Custodians.
- The desire for an Indigenous-led National First Nations Crocodile forum for cultural custodians to come together and have discussions around their ambitions for crocodiles and crocodile management.
- Signage that educates members of the public on the cultural significance of crocodiles to First Nations people alongside safety signage. This gives people an opportunity to understand the consequences to culture when acting unsafely in crocodile habitat.
- A need for a sanctuary for deemed problem crocodiles to live out their lives respectfully if there is a need for them to be removed.



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Following these consultations, we feel there has been some progress made towards positive reforms within the current legislative framework. However, the proposed Crocodile Control and Conservation Bill is at direct odds with this progress and we therefore urge the committee to reject this bill.

Warren Martens' perspective as a Totem-specific Traditional Owner in relation to crocodiles:

The Cultural Significance of the Crocodile

Kunjurra Kunggangdji is our language name for the Saltwater crocodile, they are a part of our Totem structure in our belief system. We consider them as spiritual guides, our ancestors. They're very sacred animals to our people and hold deep cultural significance. This connection is so strong, in fact, that when these Totems die, we have ceremonies around their death. When a crocodile is shot, or dies of natural causes, it's comparable to losing a member of our family. They are kin.

Indigenous Traditional Knowledge – which our people are custodians of – about living alongside this species has been handed down through generations. We can smell them. We understand how they interact with their environment. We recognise them not only as culturally significant animals but understand the profound ecological importance of them too.

It therefore creates a lot of anxiety, and trauma, when crocodiles are unnecessarily killed under the guise of human safety or for the sake of commercial profits.

Recreational hunting for crocodile skins, driven by non-Indigenous consumers between the 1940s-1970s, was the ultimate accelerator in bringing the species to the brink of extinction. Now, this Bill is threatening a regression back to the senseless killing of my Totem, as well as the expansion of a commercial industry that raises crocodiles in factory farms and slaughters them at a fraction of their lifespan for luxury fashion.

Egg collection

Whilst I am fundamentally opposed to the collection of eggs from the wild, I believe that any collection of eggs from the wild must be agreed on by Traditional Owners of the Country on which those eggs are present.

I believe that taking eggs from the wild, despite what industry-led research would indicate, could impact genetic diversity in the wild, and suggest updated research be conducted in partnership with Traditional Owners. It should be noted that I believe this research should be



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funded by the Government to ensure its impartiality and undertaken by experts who are not directly involved in/benefit from the crocodile farming industry.

Indigenous involvement in crocodile farming industry

Whilst I understand there is some Indigenous involvement in the crocodile farming industry, it should be noted that this industry primarily benefits non-Indigenous people. The inequities around the way in which this industry benefits those involved, especially in relation to Indigenous people, is of serious concern. Luxury fashion houses, which drive the farming of crocodiles (and therefore egg collection), sell luxury handbags made from their skins for anywhere between \$30,000 and \$400,000, and yet Indigenous people, who are often collecting eggs for the industry, are paid just \$55-\$65 per egg.

The current Federal Code of Practice highlights 'a risk of crocodile attack may be incurred when wild and captive-laid eggs are collected for research and/or incubation'. Undoubtedly, this is the most dangerous job in the entire supply chain, often undertaken by Traditional Owners. I would strongly argue that what Indigenous people are being paid does not reflect this.

1. Potential to Restrict the Cultural Rights of First Nations Peoples under the Human Rights Act (2019)

Crocodiles are culturally significant to many First Nations people. They are a Totemic species that exist within songlines and form a crucial part of the broader spiritual connection to Country. Both the consultation process and the administrative powers granted by the Bill fail to fully account for the significant cultural impact it would have on First Nations people.

The unrestricted killing or removal of crocodiles would negatively affect First Nations groups' ability to practice cultural traditions and maintain their connection to the land. When a dominant male crocodile is removed from a waterway, other male crocodiles from different areas often move in to establish their territory. This influx of territorial and aggressive crocodiles makes the waterway more dangerous for activities like swimming and fishing.

First Nations groups have indicated that this prevents them from gathering food and performing cultural practices on Country. This constitutes an unacceptable and unreasonable violation of human rights, as well as being counterproductive to the Bill's stated goal of creating a safer environment.



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2. Heighten the Risk of Human-Crocodile Conflict

The Bill aims to eliminate crocodiles in a bid to make Queenslanders safer, but the proposals in this Bill will likely do the opposite. One of the Bill's most glaring flaws is its failure to acknowledge individual responsibility for personal safety while in croc country. Independent reports commissioned by the Department of Environment, Tourism, Science and Innovation consistently highlight that the leading factor in most fatal and non-fatal crocodile attacks is human behaviour that is not "crocwise." Many of the Bill's proposals are destined to fail and may even increase human-crocodile conflicts by fostering a false sense of security.

Non-lethal management strategies are available to reduce negative crocodile-human interactions, which include an increase in community education programs and resources to share the dangers of un-crocwise behaviour. Additionally, increasing the enforcement powers of Indigenous rangers in areas of known crocodile territory will ensure that unsafe behaviour on croc country has real penalties. For example, with new reforms in place to penalise individuals who are displaying dangerous behaviour in crocodile territory, more on-the-spot fines can be administered to deter individuals from repeating the same offence. This not only will benefit their own individual safety, but the life of another ecologically and culturally significant crocodile, too.

3. Farming in Queensland compromises the welfare of individual crocodiles

Crocodiles are a native Australian animal that have lived on this land for over 100 million years. They play an important role in their ecosystem, maintaining the diversity and productivity of wetlands. In 2021, Defend the Wild headed a [campaign](#) into the crocodile farming industry, which unveiled the shocking conditions imposed on wild crocodiles in Australian factory farms (including those owned by Hermès). Our campaign saw over 7,000 people writing to Hermès to express their deep concern around the treatment of these animals.

Crocodiles are seen kept in group housing and rowed solitary concrete pens or wire cages. The group and solitary housing denies crocodiles basic animal welfare principles, disallowing them a life with the freedom to express natural behaviours. An expansion of Queensland's crocodile farming industry would likely cause distress, discomfort and fear if kept in the same traditional housing methods. Crocodiles must be given space to exercise and swim over a distance, totally submerge themselves underwater, and have the choice to be isolated at times and within social settings among other crocodiles at other times. This approach aligns with findings from RSPCA's research.



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It is Defend the Wild's position that the industrialised farming of crocodiles should never be permitted, especially under the guise of conservation. We advocate for reimagining our relationship with the natural world, and redesigning the incentives put in place to protect it. Having thousands of crocodiles living miserably in factory farms is not a conservation success story, but a cautionary tale. If we do not consider that our methods of conservation need to be upheld by the highest ethical standards, we ultimately fail the species we set out to protect in the first place.

In the wake of the Drop Croc campaign, Defend the Wild produced the [Northern Territory Crocodile Industry Transition](#) report. The report highlighted a plethora of ethical economic and employment opportunities that could replace and surpass those provided by the crocodile farming industry in a transition away from this cruel industry.

4. Conflict with Queensland's current regulatory framework for crocodile management

Under the *Nature Conservation Act 1992 (Qld)* (NCA), the saltwater crocodile is classified as a vulnerable species, making it illegal to take or kill one without authorisation. Such authorisation is only granted when a crocodile is deemed a threat to humans and designated as a 'problem crocodile.' However, the Bill is able to overturn this protection by granting a 'Director' the power to approve the taking or killing of any crocodile.

Crocodile management in Queensland is currently governed by the Queensland Crocodile Management Plan (QCMP), which divides the state into six zones, each with specific management guidelines. The Bill seeks to override this established framework without adequate explanation or scientific justification. An example of this is proposing the creation of 'crocodile sanctuaries' but fails to define what these sanctuaries would entail.

The harvesting of crocodile eggs in Queensland is currently regulated under the *Nature Conservation (Estuarine Crocodiles) Conservation Plan 2018*, which imposes strict conditions to ensure ecological sustainability. Licensing requires careful assessment of the environmental impact of any harvesting activity. However, the Bill shifts this authority to a 'Director,' who may issue licences based solely on completion of an unspecified 'egg harvesting safety course.' This approach risks allowing unsustainable harvesting levels and exposes harvesters to significant danger from protective mother crocodiles. Furthermore, the Bill's justification – based on economic benefits – fails to hold weight, as large-scale egg harvesting in Queensland is unlikely to be commercially viable.

Crocodile culling has been banned in Queensland since 1974, allowing populations to recover significantly. The Bill seeks to reinstate culling but fails to provide a valid justification for this drastic policy reversal or how it would serve the interests of Queenslanders.



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5. Risks Associated with Egg Harvesting

The Bill's push for large-scale egg harvesting lacks evidence or explanation. *The Independent Evaluation* (though not tasked with this issue) highlighted that commercial egg harvesting is unlikely to be viable in Queensland due to low nest density, high costs, and logistical challenges. Even in the Northern Territory, where harvesting is more established, research shows it has minimal impact on crocodile populations.

We believe this Bill should be rejected due to its lack of clear justification for culling all crocodiles from "populated waterways" and removing eggs, particularly in relation to the recovery of a listed threatened species under the *Environment Protection and Biodiversity Conservation Act 1999 (Cth)* and the *Matters of National Environmental Significance* guidelines. Additionally, the Bill fails to demonstrate that crocodile egg harvesting is an evidence-based management practice for Queensland's six distinct crocodile populations.

What's more, egg harvesting poses a significant risk of permitting untrained individuals to kill or relocate crocodiles or harvest their eggs – an approach that could endanger human lives. This clearly undermines the Bill's stated goal of reducing crocodile attacks.

Conclusion

The Crocodile Control and Conservation Bill 2025 threatens to undermine years of progress in ethical, evidence-based wildlife management for Queensland's iconic saltwater crocodiles. It disregards Indigenous cultural rights, contradicts the state's existing regulatory framework, and risks increasing human-crocodile conflict rather than reducing it. Additionally, it paves the way for an expansion of factory farming, which not only compromises animal welfare but also primarily benefits non-Indigenous industries.

Defend the Wild, in partnership with Warren Martens and other Cultural Custodians, urges the Committee to reject this Bill. Instead, we advocate for Indigenous-led management, increased ranger resourcing, and community-driven crocwise education programs. By upholding ethical conservation practices and respecting the deep cultural and ecological significance of crocodiles, Queensland can set a global precedent for coexistence over conflict.