

Inquiry into Crocodile Control and Conservation Bill 2025

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Health, Environment and Innovation Committee

Sent via email to: heic@parliament.qld.gov.au

Dear Committee,

Submission on Crocodile Control and Conservation Bill 2025

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

Hello my name is Sophie, a wildlife keeper, someone who has lived in Far North Queensland for 4 years now and has become someone who is passionate about crocs and conserving an iconic apex predator. Prior to moving here I had little to no education on crocodiles, in the first year of living here I learnt from a lot of 'locals' that they are against crocs due to not being able to swim in the places they used to as children. This goes back to the years before 1971 when Estuarine crocodiles were hunted for boots, bags, belts and trophies. They simply were swimming in locations where crocs were hunted out of. It has taken over 50 years for estuarine crocodiles to come back to a stable healthy number within these so-called 'swim spots', also creating a healthier ecosystem around them.

I'm making this submission in hope it will make you change your decision on putting forth this bill, as there is no science that indicates anything positive happening if estuarine crocodiles are killed and profited to make boots, bags and belts or have safer environments for humans. There is also nothing stated in this bill regarding conservation, only culling and profiting from this species, as stated there is only so much space in farms, sanctuaries, zoos for crocodiles to relocate, leading to more numbers being killed due to no space, would it not be best to leave them be? Let them live out their life? What happens when we have a flooding event during croc nesting season which is the wet season? Those nests that only have 40-60 eggs will be washed away and become unviable, do you still plan to harvest 5,000 eggs each year regardless of 1000's being washed away?

Estuarine crocodiles are a keystone species and an icon to the far north - tourists literally come to this beautiful part of the country to see a croc in the wild, we want to keep this occurring. Education throughout Australia isn't the best on a good day, but it lacks especially with our fauna and flora. The koala, dingo, crocodile, down to orange bellied parrots - we are causing a mass extinction for our species, the fastest extinction rate for species in the world. Let's not continue to go down that path. We mustn't kill a species that is causing an inconvenience. We must educate, add more relevant signage, and cameras to areas that have a history of illegal behaviour occurring. Education and enforcing laws is the way to coexist with an apex species. Everyday I am educating the public on croc safety and how to respect and live amongst these beautiful creatures. You can see they are interested and learn so much more, it also breaks a lot of myths about them. We have these laws for a reason, let's enforce them. For example the influencer that threw a bbq chook to an iconic croc wasn't charged, the Bloomfield crocodile incident in 2023 was not charged for filming himself walking his dog and himself into the water from a boat ramp that has had regular croc sightings. People were not here first, crocs have been on this planet for millions of years, were as humans only a few thousand. Let's learn to coexist through education and enforcing laws.

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

Sophie Nelson