

Inquiry into Crocodile Control and Conservation Bill 2025

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Submitter Comments:

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). I worked for many years in the tourism industry in the region - crocs are worth much more alive than dead. Plus they deserve to live without human predation. 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. 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.