

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)*.

Please take the time to seriously consider the submissions against the passing of the Bill. To harm one is to harm all.

The understanding that we as humans are separate from the environment is outdated. For those that are purely concerned with the livelihood of humans, may only look to the truth that we rely on the natural world for survival. The conversation could end there.

I am however fortunate to have been raised in Far North Queensland with a very strong appreciation for and connection to the natural world. The natural world is the world. We are only a small part of the whole, however, we hold a power that makes us responsible (response able) and we can choose to use that power to strengthen the whole, or weaken the whole.

If you are reading this, you are in an even better position of power to influence the outcome of this proposal. We can choose to teach our children that they are greater than a single being and that they are a part of a complex, diverse, ancient and delicate system that is made up of fascinating creatures and organisms with intelligence far beyond our comprehension. We can spark curiosity, kindness and creation. Or, we can choose to show them disconnect, fear, separation & anxiety. Consider the feelings that arose within you as you read these different options. Please, read it again and notice how they make you feel. There is no mistake, we are all making a choice here. Fortunately for us we are alive during a time of possibility. We have the science, we have the evidence, and we have the support of ancient first nations peoples wisdom to allow us to have a clear perspective. This is an exciting time! It is within our power to now swim against the current of lack & fear, to make choices that will benefit everyone & everything. To make this choice with an incredible ancient Apex predator is a great place to make an impact. We can learn from them. They do not require our management. To manage and support the system they (we) live in is something they perfected many tens on millions of years ago. We are also very fortunate that we have a community full of healthy humans with energy to burn on topics that ignite them. Reading through the submission below will make it very clear that our attention is far more potent in the direction of human education, support and community.

My name is Melanie Reynolds, I was born in Cairns Base Hospital 44 years ago and spent my childhood exploring the incredible natural world of Far North Queensland. I have a deep connection to the rhythm of nature and the beyond amazing creatures & plants that live in it, and that support/create it, with a particularly deep appreciation for Saltwater Crocodiles. I grew up at a time

when our family friend was killing crocodiles in the wild for their skins. I also spent many of my summer holidays exploring the water systems of the Daintree. I am now incredibly fortunate to be a representative for the Wet Tropics as a Private Nature & Wildlife Guide employed by FNQ Nature Tours. I spend my days and energy creating space for hundreds of visitors to become curious about their own connection to the environment, and allow them to find their way back to appreciation, respect and love for this world as one connected organism.

My voice is sincere and comes from a place of experience and genuine concern for how delicate our environment actually is.

I 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.

I recommend the Committee reject the Bill in whole.

Yours sincerely


Melanie Reynolds

Far North Queensland lifetime local

 
