

Inquiry into Crocodile Control and Conservation Bill 2025

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2nd April, 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

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

My name is Brian Ross. I am a bowhunter, a spearfisherman, an ex-professional fighter and I drive diesel trucks. But, I'm also an ecologist, a business owner, a tour operator and a spokesperson for CROC Qld. I am a local who has grown up in Cape York since I was 2 and have worked and lived across Cape York and Cairns all my life. I have trained Indigenous Rangers across Cape York. I've coordinated federal government projects to reduce the population of feral pigs and their impacts on biodiversity. I have conducted turtle nesting programs with tangible outcomes, that were so successful they were used as the case study for the 'Biodiversity Fund'. I understand science, but I also understand personal agendas and beliefs.

I am deeply concerned about the 'personal beliefs' aspect of this Bill. I say 'personal beliefs', because there is a significant lack of relevant and rigorous science to substantiate the foundations of this Bill. I strongly believe Mr. Knuth has a strong hatred for crocodiles which results in a bias against them. The claims made in the explanatory speech cherry-pick scientific evidence to support his Bill, and excluding anything that would devalue his argument.

For example, they claim that there has been an increase in sightings and have cherry-picked the lowest sighting value of all recent years to use as their baseline. I encourage you to humour me briefly. Imagine the Serengeti in 2010, when smart phones were a rarity. Imagine there was a government database there, to record lion sightings and they asked everyone to record every lion they saw. The marketability of this request alone at social media's infancy would've been wildly difficult. Now fast forward 13 years, we have iPhone 15's and Samsung S23's. People are consuming social media content at enormous rates, including government ads. Ask everyone to record the lions they saw, using their smart phones in 2023. Of course, the sightings are going to be significantly higher. Not only is the awareness of the request higher and there are more recording devices present, but the human population has also exploded. Does this mean there are more lions in 2023 than there were in 2010? In ecology, we call this 'detectability'.

Proof that this Bill is constructed from the personal beliefs and perspective of two Members of Parliament, that have no care for conservation, is in the statistics of what actually causes the most deaths in our waterways. If Mr. Katter and Mr. Knuth were seriously concerned about the lives of North Queenslanders in waterways, their first stop should be the tragic and accidental drownings in

popular swimming holes due to reckless behaviour and unfortunately at times, limited swimming ability. In the 2023/24 financial year, there were 70 drowning deaths in Queensland waterways (323 total in Australia). In this same period, in the whole of Australia, there was one death attributed to a crocodile attack. Judging by Mr. Knuth's statement "since when did we become so unconcerned about human life?", shouldn't their focus be on improving water safety at existing swimming locations? Wouldn't they save more lives with their funding by focusing their efforts here?

Mr. Knuth also states that North Queenslanders are angry about losing their waterways. But he has provided no real numbers behind that. It is totally anecdotal. In polls we've conducted ourselves, over 90% of locals understand that we live in crocodile country and are OK with crocs where they are. We are also seeing an increase in awareness around this online, with more pro-croc comments in media articles about crocodiles.

Mr. Knuth attempts to use DETSI crocodile sighting data to illustrate "the threat of crocodiles in our waterways". However, in 2010, only 10 (4%) of the 243 crocodile sightings in Queensland were reported by the user as "crocodile attack or behaving aggressively". These were then explained by an EHP officer, which Mr. Knuth conveniently omits. They are explained as:

- One of the 10 records: "It could be expected that the animals presence and display under normal circumstances would have elicited a response from the person to vacate the site. In this instance, the person is a commercial fisherman and was motivated to remain at the location to retrieve his harvest. I would not interpret the animal behaviour as an attack as the initial interaction was characteristic of a territorial display in crocodiles."
- Another of the 10 records: "The location is a popular fishing and crabbing place and the crocodile appears to be in residence at that location"
- Another of the 10 records: an attack/aggressive behavior sighting had been submitted because a cow had been taken, due to cattle accessing a waterway that is ideal crocodile habitat near Cooktown
- Another of the 10 records: "The area is well known crocodile habitat and any threat posed by the animal can be linked to negligent behaviour on the part of tourists."

Mr. Knuth also fails to show that whilst there were 243 sightings in 2010, there were very similar numbers reported in 2015, with 262 crocodiles reported. A decrease, from the previous 4 years, where between 343-371 crocodile sightings were reported. My point here is to outline the lack of scientific rigor in Mr. Knuth's statement, showing his strengths in cherry-picking, rather than his strengths in science.

Being a far north Queenslander goes hand in hand with living alongside crocodiles. As Aussie's, do we really get to boast to our international friends, how dangerous our country is because of snakes and crocs, but then turn around and say we need to remove crocodiles because we can't swim in croc country? Mr. Knuth also states that we've "not had to worry about the threat of crocodiles in our recreational waterways and beaches until the past two decades". This is so incredibly naïve, that only a Member of Parliament with blinkers on would say it. Far North Queensland residents have known for more than 2 decades that we live in croc country and that we need to be smart about where we swim. This statement has me questioning whether Mr. Knuth himself is an NQ local and represents the local community's majority views.

Similarly, his statement “flooding in North Queensland has presented additional issues because of the overpopulation of crocodiles in our waterways” is incorrect. Crocodile populations in Queensland are still considered as threatened and ‘recovering’. They are not considered overpopulated from a scientific point of view. It is also incorrect, because any body of water that could get connected to rivers from a flood event, is already potential crocodile habitat. Locals understand that.

I am also surprised to hear Mr. Knuth using an Indigenous argument for his Bill, as I’ve never heard him support Indigenous Australians in any of his other proposals. Suggesting that trophy hunting could be a sustainable way to manage a crocodile population in Queensland has no scientific backing whatsoever. Furthermore, there would not be enough crocs to hunt, to generate any kind of significant value to the local economy or community, without severely threatening crocodile populations. Trophy hunting generally involves targeting large ‘trophy animals’. These are the animals that attract a higher value. Given that female estuarine crocodiles are all less than 3.2m, and anything bigger is male, we would presume that trophy animals would be large males. We know large male crocodiles are territorial and so there may only be 1 dominant male for every 5 kilometres of river. Now also, consider that most of these large crocodiles are Icon Crocodiles, crocodiles that are culturally significant. To justify trophy hunting as economically viable, you would need to continually hunt the large dominant male crocodiles in each system, disrespecting Indigenous cultural values and unbalancing the ecosystem at the same time.

Finally, without anyone to answer to, this proposed committee could have the power to “decide the number of crocodiles that may be culled” as infinite. It is extremely concerning that this amount of power could be given to an independent organization that very clearly has its own agenda.

I have included some scientific data and summaries from a 2024 research journal below. This is the kind of data Mr. Knuth would happily omit, in the hopes that his Bill gets approved by someone without all the information.

I believe this summary from Baker et al. (2024), *The influence of crocodile density on the prevalence of human attacks*, to be more relevant and rigorous scientific evidence than Mr. Knuth's cherry picked evidence.

- There is little evidence supporting a consistent link between large predator density & attacks on humans
- Attack frequency increased as croc population recovered from very low levels in the 1970s.
- Attack rates stabilised around 2009, despite crocodile density and the human population continuing to increase. A likely outcome of CrocWise messaging, showing that humans are the cause of the conflict
- Based on the relationship between crocodile density and human-attack frequency, scenario modelling suggested that the crocodile population would need to be culled to a critically endangered level (e.g. 90% population reduction) to reduce attacks on humans from 2.16 to 1.16 attacks per year.
- "We conclude that whilst crocodile density significantly influences crocodile attack rates at low crocodile population sizes, this relationship becomes weaker as the density increases. For estuarine crocodiles in the NT, a plateauing of attack risk occurred once crocodile density attained ~2 crocodiles per km of river, and we argue that this was because high crocodile densities instigated management (e.g. removal of bold animals, exclusion zones) and education initiatives by the government (e.g. 'Be crocwise' campaign) that subsequently evoked a change in human behaviour around waterways and stabilised the attack rate."
- By having large, conspicuous crocodiles in the local environment, humans have modified their behaviour around water, which has considerably reduced the likelihood of attacks
- Reducing the density of large predator populations is often made under the assumption that it will decrease the frequency of attacks on humans. This notion seems logical, but other factors, such as:
 1. changes in human population density, distribution and behaviour
 2. reduction in the predator's usual prey
 3. and the easier communication of predator encounters facilitated by the internet and social networks have been shown to drive the frequency of attacks on humans by large predators.
- **Human population size was more strongly correlated with the frequency of attacks than crocodile density**
- **If the croc population maintains its current growth rate over the next 10 years, without any human interventions, there is likely to be little or no statistically significant change in the frequency of attacks per year by 2033 compared to 2022.**
- Achieving such crocodile population reduction (90% reduction) in the NT would be politically challenging because it would push the species back into the critically endangered category under Category 1a of the IUCN Red List (i.e. population reduction of more than 90% in less than 10 years) (EPBC Act, 1999; IUCN, 2012). If we were to try and achieve a population reduction without attaining a threatened species listing for estuarine crocodiles (<70% reduction in 10 years), then attack frequency would be reduced by less than one attack per year. Generally, under the Environmental Protection and Biodiversity Conservation Act (EPBC Act, 1999), it is not possible to perform any management actions that increase the endangerment of a species.
- In comparison, between 2013 and 2016, the Northern Territory Government spent AUD\$250,000 on the 'Be Crocwise' educational campaign. Since the campaign's implementation in 2009, there has been a 10% decrease in the frequency of crocodile attacks. This decrease would be equivalent to culling 15% of the crocodile population (~15,000 individuals at the cost of ~AUD\$14,625,000)

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.

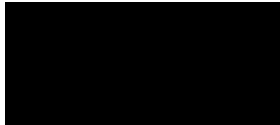
Conclusion

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

Brian Ross



Spokesperson for CROC Qld