

## **Inquiry into Crocodile Control and Conservation Bill 2025**

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| <b>Submission No:</b>      | 147  |
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Health, Environment and Innovation Committee

Sent via email to: [heic@parliament.qld.gov.au](mailto:heic@parliament.qld.gov.au)

Dear Committee,

### **Submission on the Crocodile Control and Conservation Bill 2025**

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

I am making this submission as a concerned citizen who is deeply opposed to the Bill. I believe this legislation represents a significant step backwards in our relationship with one of Australia's most iconic and ecologically vital species. The premise of this Bill—that crocodile populations require further management or control—is fundamentally flawed. Scientific data indicates that crocodile numbers have not yet returned to pre-culling levels, and the narrative of “overpopulation” is not supported by ecological evidence.

Much of the public's opinion on crocodiles is shaped not by personal experience, but by the fear-driven narratives perpetuated by mainstream media. These portrayals paint crocodiles as nothing more than lurking, man-eating predators, rather than the complex, remarkable creatures they truly are—products of millions of years of evolution, simply doing what comes naturally. I hold hope that this narrative can shift, and that one day the majority will come to appreciate crocodiles as a valuable part of Australia's natural

heritage.

As well as coexisting with Crocodiles in my local area when fishing and camping, I have also travelled many times from Townsville to the Daintree with the sole purpose of observing these animals in their natural environment and seeing them through the eyes of someone truly dedicated to their protection and the shifting of our perception. It's overwhelming how deeply misunderstood they are. Rather than continuing to vilify them, we should be investing in public education, coexistence strategies, and fostering respect for a species that plays a crucial role in our ecosystems.

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**

The Crocodile Conservation and Control Bill 2025 reflects a reactionary, fear-based approach rather than a science-based, ethical one. We owe it to future generations—and to the wildlife that defines so much of our country's natural identity—to do better.

Crocodiles are not monsters. They are animals, shaped by evolution, doing what comes naturally. They are not overpopulated, they are misunderstood. Most people form their opinions about crocodiles from media sensationalism, not personal experience. I hope that one day the narrative can be changed to enable people to see crocodiles not as lurking predators, but as ancient creatures with a rightful place in our ecosystems.

This Bill does not reflect progress. It reflects fear, and fear should never be the foundation of environmental legislation.

Crocodiles deserve protection and respect, not persecution.

I recommend the Committee reject the Bill in whole.

Yours sincerely,

Shelene Garvey



Concerned citizen