

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

<b>Submission No:</b>	153
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<b>Publication:</b>	Making the submission and your name public
<b>Attachments:</b>	See attachment
<b>Submitter Comments:</b>	

03/04/2025  
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03 April 2025

**Health, Environment and Innovation Committee**

Sent via email to: [heic@parliament.qld.gov.au](mailto: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 Jack Gatto. I am the Head Keeper of the Reptile Department at Ballarat Wildlife Park. I have had 8 years experience working alongside Saltwater Crocodiles in both a zoo capacity and at a crocodile farm and spent a lot of time in "croc country", and am lucky enough to work alongside Saltwater crocodiles every day of my life. The Bill is a culling exercise and you would be hard pressed to find anything supporting an already protected and vulnerable species in the bill, misinformation and lies are what is driving this bill. Removing large crocodiles or any crocodiles from their habitat has a detrimental effect on the ecosystem, allowing pest species such as wild pig and deer to flourish, it also creates imbalance to the direct ecosystem. Removing or killing crocodiles also creates a false sense of security for humans, people think it's safe to swim in waterways where crocodiles have been removed, resulting in a chance for a negative human/crocodile related incident. Crocodiles are culturally significant to some first nations communities and are seen as totems, culling or removing the crocodiles increases stress, anxiety and tension within these communities. We already have a Be Croc Wise campaign in place which is an effective educational tool and campaign used to educate the community and general public of the appropriate behaviour in crocodile country. This bill undermines Queensland's science based crocodile management program - this bill would replace the science based crocodile management program with poorly defined regulations, including mass culling and commercial trade, without sound ecological justification. This bill conflicts with National and International Law, the bill disregards Australia's Environment Protection and Biodiversity Conservation act and the Convention of International trade in Endangered species (CITES), potentially breaching international agreements. A major failure in the bill is the absence of holding individuals responsible for their own personal safety in "croc country". The Department of Environment, tourism, science and innovation is that the main contributing factor to crocodile and human related incidents is the non "crocwise" behaviour of humans. In conclusion, the bill should be rejected because there has been no clear explanation of how the culling and removal of all crocodiles from "populated waterways" is supported by the evidence outlined in the research commissioned by the Department or how the adoption of this practice would support the objectives of the bill, it is not based on any meaningful consultation with representatives from all First nations groups impacted by the bill. The bill should be rejected because it does not acknowledge or incorporate the Be Crocwise Program into any crocodile management framework or view the program as the first response to an incidence of human and crocodile conflict. The bill should be rejected because it does not provide a clear explanation of how the harvesting of crocodile eggs by any party has been established as an

evidence based practice for the management of crocodiles in the six independent crocodile populations around the state.

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

**Jack Gatto**

***Head Reptile Keeper - Ballarat Wildlife Park***

***Conservationist***