

Mr Gregory Andrews
Threatened Species Commissioner
Department of the Environment
GPO Box 787 CANBERRA ACT 2601

24 May 2016

Dear Mr Andrews,

Our wild environment: parks, open spaces, presence of wildlife and humans ?

I commend your Government role in seeking to save threatened species. The Australian public are however becoming increasingly incensed over the extent to which all manner of poisons; Pindone used to kill rabbits, (1080 (Sodium monofluoroacetate) and PAPP (Para-aminopropiophenone) used to kill various species and 'CURIOSITY' (encapsulated PAPP) developed to kill cats. Most of these poisons were banned *over a decade ago* in the rest of the developed world as too cruel and inhumane; but are "poisons to Australia as guns are to America"?

New Zealand, where small vulnerable flightless birds are common, is reaping wide criticism for going down the track of a multiple poisoning responses due to concerns now with the net result that wildlife has declined and becoming scarce. Repetitive poison programmes with counter poisoning are certainly the only major steps being taken by all levels of our Australian Government while the major causes to wildlife depletion and the prevention of reproduction and feral take up of target species is simply being ignored(!). Poisons are costly and unethical but easy while the effective alternatives are all dismissed as troublesome and politically incorrect.

Australia's government-owned parks and open space are becoming undesirable places for human species to be as most people today have a moral conscience or seek out the facts about all the poisons in use. The public are also greeted and reminded by both failures to prevent bushfire carnage or morose signs warning us that non-pest and native, as well as target pests are all being quietly cruelly and mercilessly smitten. Humane options show marked advantages to steadily adopting more nasty poisons but still await our Government's interest or development.

The national parks and free nature we applaud should be welcome and encourage visitors, and could return far more visitor revenue than it does. In USA and Canada circumstances often even permit companion dogs under control to accompany family in national parks, with penalties applying.

Eighteen months ago we tried (again) to enter the Warrambungle NP and were greeted not by any lack of endangered species but the silence from 'complete' animal carnage from devastating bushfires and no animals left of any sort, but the odd poison sign still intact. Not even birds flew over seeking food. This widespread depletion is thorough, massive and certain.

The Warrumbungle rangers and parks administrators were accused of complacency, repeatedly ignoring warnings to take preventative action in time. When the Manager of National Parks and Wildlife transferred from the Blue Mountains and major bushfire NSW site, to the Central Coast the news conveyed his priority was to start work, not with major bushfire strategy, but on programmes to target and eliminate a perceived “wild animal problem” at the Central Coast nearby Sydney. The notional presence of few wild dogs was being put about and a rabbit problem (which Council passed on had appeared in residents vegetable gardens near parks –alongside protected possums, bush turkeys etc, which would simply continue on heedlessly doing so).

As we all know, government alike, it is ‘human development’ which is endangering threatened species and wildlife, the failure to tackle wide scale fire prevention and access to water **and** ad hoc reproduction of strays due to absence of any national registration requirements for the ownership and breeding of companion animals; all of which our Government still fails to act on.

I have drawn on the information from family members, one a veterinarian to a major wildlife hospital and sanctuary, the other experienced from a domestic and companion animal perspective. The presence of man’s poisons also in wildlife is experienced and not uncommon. Another offspring in human medicine, is concerned with lifestyle, preventative medicine and society’s mental as much as physical wellbeing today and which is also bound up with its use of all animals, endangered and not, to benefit the lives and wellness of humans.

My own school is Economics (Uni Melb.1971), some years spent in underdeveloped India, working in international business world and in administering leading public, teaching and research hospitals. All was driven by the essence of improving our society’s mental and physical health. This path lies supremely in developing a compassionate and harmonious relationship with all species of our planet; endangered, wild or simply useful to our own. Our Government activities lag well behind mainstream public thought.

I attach some important facts researched and presented in a major Australian University study into ‘cats’ and also the trial of a new ‘cat poison’ ‘Curiosity’ with the surprising findings and recommendation from both.

1. **‘Australia’s Biodiversity Conservation Strategy 2010-2030’ prepared by the Invasive Animals Cooperative Research Centre (IACRC) undertaken at University of Sydney in February 2010.**
2. **The Field efficacy of ‘Curiosity Bait’ at Roxby Downs 2014 (Arthur Rylah Institute for Environmental Research Technical Report No 253) recent study into ‘Curiosity’ (encapsulated PAPP)**

Yours sincerely,



Pamela Gillot, [REDACTED]

**POISONS ARE TO AUSTRALIA AS GUNS ARE TO AMERICA –
NOW ‘CURIOSITY’BAITS FOR CATS - COUNTER-POISONING OF THE REST –
IS IT ALL JUSTIFIED?**

A national ‘Threatened Species Summit’ was held on 16 July 2015 where Ministers agreed to review arrangements within their respective jurisdictions and where necessary, remove unnecessary barriers to effective (and humane) control of ‘feral cats’.

A \$6.6 million Eradication of Stray Cats Programme was announced in July 2015 by Prime Minister Tony Abbott and the Federal Coalition Government – presenting a public target of 2 million dead cats. ‘Stray cats’ differ to ‘feral cats’ in physical characteristics and behaviour . Strays are cats found outside of private property without microchip or details of ownership.

The resulting programme to target ‘stray cats’ was planned without any public debate or sound consideration of the following important study findings:

1. ***‘Australia’s Biodiversity Conservation Strategy 2010-2030’ prepared by the Invasive Animals Cooperative Research Centre (IACRC) at University of Sydney February 2010.*** This would be arguably the most recent major study into both stray and feral cats in Australia: evaluating their location, prevalence, differences, effects on wildlife and control of other pests and the most effective and humane means of control where required. This is an 84 page document, 28 pages referencing its many contributing studies and its findings are surprising.
2. ***‘The Field efficacy of Curiosity Bait at Roxby Downs 2014 (Arthur Rylah Institute for Environmental Research Technical Report No 253) recent study into ‘Curiosity’ (encapsulated PAPP) solution.*** The results and limitations of this field trial need to be evaluated in terms of cost/effectiveness of such a poison programme in actually protecting threatened species. These findings may also surprise.

Firstly ‘the \$6.6 million budget to target 2 million stray or unidentified cats could easily succeed. However the findings of the IACRC study of all cats and the trial of Curiosity on feral cats would indicate that neither the major cat eradication programme nor the practical distribution of Curiosity Baits would result in saving threatened species.

It would however generate public outcry no steps have been taken nationally to even enforce responsible companion animal ownership and prevent stray and feral cat development and reproduction. There is no federal legislation or unified legal requirements in place throughout all the Australian States and Territories to identify and follow up on the cat population.

This requires federal legislation to be in place enforcing the micro chipping, identifying, issuing of licences and the requirement to neuter cats or other companion animals, unless registered for intention to breed. This would ensure owners are educated, take their responsibilities seriously

and can be followed up so that no cats or companion animals escape the radar, become strays and reproduce. Fees and penalties could cover the cost of the programme and its uptake.

The first priority is to thus unify the requirements of all states and territories under one single comprehensive federal legislation before any 'National Stray Cat (Kill) Programme' be considered and best actions determined concerning 'Threatened Species'.

The IACRC study concluded that undertaking this unified national legislation would provide the single major preventative force to stop at source any further feral and stray cat development. This must be in place if our Government is to be taken seriously and considered fair in use of taxpayer funding to launch any such wide scale cat eradication programme and poison regime.

The announcement of the cat (kill) programme has so far only sensationalised and ignited national mood for random head hunting, targeting or poisoning of innocent cats and perhaps other companion animals. It is likely to simply trigger an increase in 'creative killing' by many already so-inclined humans on basis of meeting such targets. This is already evidenced in rescue centres (such as Blacktown, Renbury Park NSW and the random bow and arrow hunting of cats on Kangaroo Island, which is also considered to have no 'feral' cats). Those who are skilled in handling cats are witnessing such results and have been excluded from any consultation.

The Australian Government will also attract world attention if it ignores the experts' findings and simply proceeds to implement more knee jerk poison programmes which could also threaten or end up removing companion animals from our country and way of life, which would be conspicuously unique amongst all other advanced western nations.

The federal government needs to set as its very first priority the introduction of unified nationwide legislation for the responsible licensed ownership and registered breeding of all pets and companion animals with penalties for non compliance.

Findings from the IACRC study

Excess is NOT endangered

It is recognised that cats, as foxes, dogs or any animal which survives by predation will target animals or insects which are in excess and not rare. This is reinforced throughout the IACRC study of cat behaviour and from the analysis of cat stomach contents.

This natural fact motivated the deliberate releasing of cats into the wild in WA after year 2000 which is raised in the study. It then later triggered a turnaround decision to poison bait, cull or eradicate the resulting stray numbers and development of feral cats. This was then further followed by a perceived need to embark on poison programmes to then deal with the coinciding increase in the rabbit and rodent population. There is balance in nature and 'meddle with at your peril' as David Attenborough and many biologists warn, and further to the repeated Australian experience, there is every reason to now proceed with caution.

Cat numbers and locations examined

Accurate assessment of cat numbers by evidence is difficult and relies on photography and DNA analysis.

'Arid areas' and not temperate areas were reported to provide the only accurately measured evidence of the presence of wild or 'feral cats'. Cats are desert animals by origin and can exist on little water and a diet of insects. The IACRC studies showed that feral cat presence was low in most other habitats.

'Stray cats' were only found highly present in proximity to:

1) towns 2) farms 3) rubbish tips and 4) or on islands, isolated or fenced land areas.

Diet of cats examined

In the areas where cats were found more predominant the IACRC study found they were *not* eating wildlife nor threatened wild life, their overriding prey was determined to be insects, pests and rodents of around 200g. (While well fed domestic cats in residential areas may turn to chasing lizards or rodents, cats in the wild tend to be preoccupied and motivated by survival and food consumption).

Repeat analysis of scats and stomach contents on wider land areas established little evidence to connect wildlife or endangered species, to the major diet of 'stray' or 'feral' cats *except* within isolated, fenced areas or islands and where rabbits and rodents had been exterminated.

The study established that the major prey component found in the scats and stomachs of 'feral cats' and 'stray cats' are overwhelmingly; insects, rabbits and rodents and thus pests.

Scavenging for food scraps, insects or rodents at the common dump sites, in towns or near farms, was found to form the major diet with respect to 'stray cats'.

Scavenging for food was also found to be a high provider of food to 'feral cats' and to contribute up to 57 percent of their overall diet in the NSW state.

Where animal prey is scarce or conditions arid, feral cats are common, insects formed almost 100 percent of their diet. Even in dump sites insects provided 40 percent (insects and moths being very nutritious).

In order to become prey to cats, animals or birds would also need to be of such very small size, on the ground or flightless and nocturnal (which unlike New Zealand, is not common in Australia) which other than those sick or abandoned were rodents.

The IACRC studies on native species were completed at only limited locations, however both the above studies found little if any evidence by stomach contents that wildlife and certainly threatened species was a primary dietary source for cats.

Poison Baiting examined

It is clear from the wide findings of the IACRC study that if the Government has a plan to poison and eradicate 'stray' and 'feral' cats across Australia it will need to be very wide scale *and* simultaneously instigated with an equally wide scale programme to poison rabbits and rodents which would increase. There would also be need to embark on a wide scale poisoning of dingoes, wild dogs and foxes which are found to largely feed on rabbits and rodents.

A comprehensive multiple poisoning offensive and funding would be required and the consequences seriously considered. The wider general public would find that situation and its evidence to be highly confronting, offensive and inhumane.

In New Zealand, where non flight birds are common, the land is viewed to have become over-saturated with all manner of poisons and the survivors of any species considered to have been adversely affected, become scarce or sparse.

In the case of the common populations of 'strays', i.e. around towns, farms or dump sites, the IACRC study reported that trapping was found effective and preferred.

Suitability of Poisons and other options examined (ref: IACRC page 46)

- **1080 (Sodium monofluoroacetate)** poison baiting was not found successful by comparison with shooting *other* than in isolated areas such as islands or areas fenced over 1.1metre, floppy topped or electric, and which also excluded foxes.

1080 was banned in USA over 30 years ago (since 1983) and also in other western nations and is long considered to be a cruel merciless poison and

very inhumane. Death is believed to occur in up to 12 hours but can take much longer and after the animals often travel considerable distances. It does not meet the standard of humane poisoning internationally unless analgesia could be added and this is not workable nor being done.

Aerial baits are dropped for practicality. This cannot target particular species and carcasses are also not retrievable. Species of birds and reptiles are found vulnerable to the poison pellets which are also ingested by carrion reliant or meat-eating animals and birds, (noted to be corvids, raptors, kestrels, wedge-tailed eagles, brown falcons, butcher birds and owls), lizards and invertebrates.

1080 is also found to be commonly ingested by larger non-pest mammals or native animals: companion animals, tiger quolls, long nosed potoroos, certain wallabies, and kangaroo, as in Tasmanian studies.

Test of poison pellets and their size on beagle dogs has been ongoing but this research is now viewed unethical and inhumane.

Only a combination of shooting, trapping *with* poisoning and when this is restricted to isolated areas or islands and *after* eradication of rabbits and rodents, was found effective.

- **Cyanide**: as used in New Zealand on the possums is considered inhumane
- **PAPP (Para-aminopropiophenone)** is being examined as it is thought to bring on lethargy and offer a speedier death.
- **'CURIOSITY' (encapsulated PAPP)** Field efficacy of Curiosity Bait at Roxby Downs 2014 (Arthur Rylah Inst.for Environ. Research Tech.Report No 253). Encapsulation was considered to decrease take up by non feral animals, with the findings being:
 1. Take up of poison by bird species and non pest animals were noted. Risks to birds was reported and showing the negative effect on bird numbers was greater in baited areas *than* in non-baited areas (ref table 8, P.24), and affected corvids, raptors, wedge tailed eagles, brown falcons, butcher birds, potentially lizards and non pest animals.
 2. Without individual tracking and the recovery of carcasses, as in the study, this would pose direct risk to scavenging native animals, birds, lizards or non target species .
 3. Increased rabbit, rodents and other pest populations need to be countered .
 4. In 'non-arid' areas where rainwater was present and live prey prevalent, stomach contents showed live prey was preferred and the poison pellet effectiveness was limited.

5. In the 'arid' area of study where live prey was consumed, stomach contents showed the preferred food to be: insects, rabbits (pest) and lizards (climate survivors and common) and not threatened species.
6. It was determined from the Roxby Downs Curiosity bait trials that any positive results on wildlife would be inapplicable or unsuccessful at 'non-arid' locations. The baiting also showed a negative effect on numbers of native species and predator birds in the baited areas, which confirmed their uptake of the poison and would be much higher without the individual tracking collars and high recovery of the poisoned carcasses.

- **Trap-Neuter-Return**

Is used successfully in USA to effectively cut reproduction rates in main centres of stray and feral population.

- **Releasing diseases such as feline leukaemia and immunodeficiency disease** is viewed unethical and with potential for non specific spread.
- **VVIC (Viral Vectored Immunocontraception)**.

This is either naturally transmitted or bait-delivered to target specific species and is considered to be far more efficient and longer term for reducing pest numbers and also far more ethical than poisoning. It may only be limited by the eventual changing immune function. Development VVIC needs to be heavily stepped up and funded.

CONCLUSIONS

- All poisons offer significant risks to non-target species and showed increased general uptake when food is scarce, water limited or in arid areas.
- Wide scale repetitive poison programmes and counter-poison programmes would be required in order to control other interrelated pest species, in order to also control rabbits and to remove dogs and foxes, which also feed on rabbits and would seek other prey.
- Such wide scale programmes need to be fully monitored and repetitive as they do not work long term.
- Allowing each species to increase in numbers over and over before wide scale poison baiting is counter-productive and also cruel and inhumane.
- Electronic monitoring and high rate of carcass removal, as in the Roxby Downs 'Curiosity' trials is impossible in the open population, as with all poisons. Scattered carcasses are then consumed by the non-target or protected species.

- Cats can only consume surface baits which make for higher uptake by non-pests.
- Baiting uptake by cats is low *unless* the area is 'arid', other food and water is scarce or rabbits, rodents and other prey are also poisoned.
- Since 1080 was banned thirty years ago in USA and other western nations, its use is viewed as unethical for cats or other animals.
- Poison baiting is found only suitable for fenced, isolated areas or islands and *combined* with shooting, trapping and eradication of rabbits, rodents, and other prey.
- Contagious diseases in cats are already prevalent in wildlife

RECOMMENDED STRATEGY FOR PROTECTION OF THREATENED SPECIES

1. A 'national strategy' is urgently required in all Australian States and Territories to stop the ongoing invasion of nature by potential predators through education and introducing and enforcing uniform federal legislation to all states and territories. All companion animals need to be micro chipped, identified, and neutered or the owners registered for intention to breed. Pet owners would then be licensed for follow up their responsibilities, issuing fines and penalties.
This programme would be ongoing, preventative and could be self funding.
2. The major depletion of wildlife and threatened species is widely accepted to be perpetrated by humans through heedless development, living in proximity, and with the associated car traffic resulting in road kill. This requires a major offensive and far more strictly controlled development approvals and to be preceded by effective native animal resettlement programmes. The State Governments have primary interest stakes and an ongoing relationship with development/developer activity and fail badly in accepting responsibility and addressing its recognised major effect on wildlife depletion particularly due to human inhabitation of coastal and river lands.
3. Growing incidence of extensive bushfires and unstoppable fire storms which are commonly instigated through human activity must be heavily combated. The focus should be on serious research, containment strategies and more active creation of breaks within *all* extensive areas of bushland, and in harnessing dams and water

courses to prevent the most wide and complete death and carnage to wildlife and endangered species.

- 4. The stepping up of vital research and funding into immunocontraception (VVIC)in target species, cats rodents, foxes etc, also through the Universities e.g. Newcastle.**
- 5. The release of captive-reared endangered wildlife into isolated predator-free, development- free, safe environments.**

**Pamela Gillot (B. Eco & Comm.Uni Melb. 1971)
24 May 2016**

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