

25 May 2016

Pest Animal Review
Natural Resources Commission
GPO Box 5341
Sydney NSW 2001

Via email: nrc@nrc.nsw.gov.au

Dear Sir/Madam

Shared Problem, Shared Solutions: Pest Animal Management Review - Draft Report

Thank you for the opportunity for to comment on the draft report of the Pest Animal Management Review (the Review). This letter and accompanying comments represent a joint submission from RSPCA Australia and RSPCA New South Wales.

RSPCA Australia notes the importance of clearly describing the roles and responsibilities for pest animal management at both the state and regional level as well as gaining whole of community support, with the latter being particularly important regarding using acceptable and humane pest animal control methods.

It is pleasing that the Commission has consulted widely with various stakeholders including those concerned with animal welfare issues and that animal welfare is referred to in the report. However, this reference is limited and there are several aspects of concern relating to animal welfare which were overlooked but are detailed in this submission. Despite animal welfare being identified as an important principle for effective pest animal management and a priority at the main stakeholder workshop, this sentiment is not reflected in the report. Disappointingly, animal welfare is not listed as one of the six principles for effective pest animal management in the report.

Our detailed comments on these and other issues are attached.

Thank you for considering our comments. Please do not hesitate to contact our office should you wish to discuss any of these matters further.

Yours sincerely



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RSPCA Comments on:

NSW Natural Resources Commission

***Shared Problem, Shared Solutions: Pest Animal Management Review
Draft Report March 2016***

General comments

The RSPCA is thankful for the opportunity to comment on the Pest Animal Management Review draft report. It is quite comprehensive, covering many issues that we consider to be very important with regard to the management of pest animals but it does not sufficiently focus on key animal welfare issues. These include steps to prioritise and justify control programs, measuring the effectiveness of control methods, and minimising animal welfare impacts (i.e. increasing humaneness) on target and non-target species through an emphasis on the adoption of welfare codes of practice and standard operating procedures. To this end, it is essential that inhumane practices are no longer promoted or available when more humane alternatives can be used. RSPCA Australia strongly urges investment in researching more humane methods including fertility control methods due to the inherent adverse effects of all current poison and biocontrol methods.

Specific comments

Issue	Comments
<p>1.1.1 Principles of pest animal management Page 2</p>	<p>The final dot point on this list is: Ethical - making sure procedures follow guidelines and maintain social licence. Animal welfare is taken into account.</p> <p>Animal welfare is a critical consideration given that pest animal control involves the mass killing of animals. Animal welfare was identified as an important principle for effective pest animal management and a priority in the stakeholder workshop held in Sydney, Sept 2015 (see Appendix 2 of the Review). There are opportunities to increase reference to animal welfare/humaneness throughout the Review. It should be moved up this list and reworded as follows: Ethical - making sure procedures <i>are ethically justified and cause the least possible harm to animals.</i></p>
<p>Table 1.1 Principles for effective pest management Page 20</p>	<p>See above.</p> <p>Recommend adding the following to Table 1.1: <i>Animal Welfare - pest animal management must recognise the sentience of target and non-target animals, use the most humane and effective methods and minimise animal welfare impacts through the application of best practice methods</i></p>
<p>Strong promotion of COPs and SOPs for all pest species</p>	<p>The NSW government has already taken a lead in the development of best practice Codes of Practice and Standard Operating Procedures for pest animal management. This Review provides an opportunity to promote and develop this approach and ensure it covers all new</p>

	<p>methods. Where appropriate, the Review should refer to relevant COPs and SOPs (these are currently mentioned with regard to feral horse control but not for other species).</p> <p>The RSPCA recommends:</p> <ul style="list-style-type: none"> • Strong promotion of the Codes of Practice and Standard Operating Procedures for all species declared under the NSW Invasive Species Plan • Priority development of Welfare Codes of Practice for all species where none exist • Priority development of Standard Operating Procedures for all species where none exist • Review of <p>Existing COPs: Wild dogs, Foxes, Rabbits, Feral pigs, Feral cats, Feral goats, Feral horses, Feral donkeys, Feral camels</p> <p>COPs needed:</p> <ul style="list-style-type: none"> • Feral deer • Carp - fish are included under the NSW <i>Prevention of Cruelty to Animals Act 1979</i> and research shows that fish are capable of feeling pain <p>SOPs needed: There is also a need to develop new SOPs for specific control methods currently being used, e.g. 1080 use for rabbits, PAPP for wild dogs, foxes and feral cats, so that best practice standards are available for all methods advocated/registered, and these methods can be assessed for their humaneness.</p>
<p>Phase-out unacceptable methods</p>	<p>The RSPCA believes that the Review provides a unique opportunity to identify and recommend control measures which are not acceptable on welfare grounds and where more humane alternatives exist. There is no justification in promoting or indeed permitting the ongoing use of compounds/methods which are known to cause significant suffering. The NSW Codes of Practice & Standard Operating Procedures for key pest species call for the phasing out of five unacceptable techniques: steel-jawed traps for rabbits, foxes, wild dogs and feral cats; strychnine baits for foxes and wild dogs; chloropicrin fumigation for rabbits; warfarin baits for feral pigs; and yellow phosphorous for feral pigs. The current status of these methods in NSW is that steel-jawed traps, warfarin and yellow phosphorous have already been phased out. Strychnine is used under a minor use permit for application to the jaws of traps for wild dogs. Chloropicrin is still used for pressure fumigation of rabbit warrens by trained operators.</p> <p>See: http://www.dpi.nsw.gov.au/content/agriculture/pests-weeds/vertebrate-pests/publications/model-codes-of-practice</p> <p>The relative humaneness model for pest animal control methods (Sharp et al 201) should be used to assess all methods covered in the COPs and SOP and identify unacceptable methods.</p>
<p>Prohibit recreational hunting as a method for pest animal control</p>	<p>It is noted on page 79 of the Review that recreational hunting is not considered an effective method for feral animal population control. Based on this and the significant animal welfare concerns, the RSPCA strongly recommends that recreational hunting not be considered as a</p>

	<p>form of pest animal control.</p> <p>In our view, the only circumstances under which amateur shooters could be included in pest animal management programs should be when under government supervision, when assessed as competent for shooting accuracy and when formal monitoring is conducted to assess efficiency and animal welfare aspects.</p> <p>Under no circumstances should bow hunting be permitted as a means of controlling pest animals. Bow hunting has inherent risks to animal welfare resulting in pain and suffering. Further details are provided in the RSPCA Knowledgebase article What is the RSPCA's view on bow hunting?</p>
COMMENTS ON THE REPORT'S RECOMMENDATIONS	
Recommendation 1	Adoption of core components for state planning
1v. Reduce red tape to improve control of pests	The RSPCA does not support the concept of 'red tap reduction' as a principle - rules and regulations should be considered on the basis of their merit, not in terms of their overall number. We have concerns that 'reducing red tape' is often done to the detriment of animal welfare, e.g. the removal of processes to ensure that shooters are competent.
New recommendation	<p>The NSW government has led the development of best practice Codes of Practice and Standard Operating Procedures for pest animal management, as well as conducting research into more humane control methods. We recommend that this work be supported and built on with the addition of a new clause to the core components of the NSW Invasive Species Plan 2015-2022:</p> <p><i>ix. Utilise the most humane methods available and support research to develop more humane methods.</i></p>
Recommendation 2	Provide transparent state level leadership and accountability
i.d. NSW Invasive Species Plan 2015-2022 - objectives and priorities	In addition to delivering prevention and control, pest animal management programs should also adopt a standard approach to justify the need for control through monitoring the abundance of pest species and their impact, and ensure that ongoing and post-control measurements are taken, recorded and analysed to assess effectiveness.
Recommendations 5-10	Better risk management
	The RSPCA supports these recommendations to better inform, predict and respond to the risks posed by new incursions of pest animals. Early invention will help reduce the numbers of animals targeted and the overall animal welfare impact of control.
Recommendation 16	Manage deer as a pest animals
	<p>We support the removal of deer listed as 'game' animals to allow effective management using best practice humane methods under government control.</p> <p>Recommend adding the following;</p> <p><i>Ensure any mandatory measures requiring ground shooting are consistent with the Standard Operating Procedure DEE001 Ground shooting of wild deer</i></p>

Recommendation 17	Manage feral cats as a pest animal
	<p>We support addition of feral cats under the NSW <i>Biosecurity Act 2015</i> to allow effective management using best practice humane methods under government control.</p> <p>We support all clauses and in particular:</p> <ul style="list-style-type: none"> • Clause (ii) to ensure any mandatory measures are consistent with the model code of practice for the humane control of feral cats • Clause (iv) regarding amendments to the NSW <i>Companion Animal Act 1998</i> to require compulsory desexing under 4 months, breeder registration, cat registration and cat confinement where appropriate <p>We also support the concept of a partnership between the RSPCA and NSW Government to deliver a targeted public awareness campaign, providing such a campaign is appropriately resourced.</p>
Recommendation 19	Prioritise the implementation of biocontrol options for carp
	<p>The RSPCA is concerned about the welfare impact of disease-causing biocontrol agents. Fish are covered by the <i>NSW Prevention of Cruelty to Animals Act</i>. The available evidence is that fish can experience pain and therefore any disease-causing agent must not cause prolonged and high levels of suffering and measures should be taken to ensure that affected fish are dealt with as humanely as possible.</p>
Recommendation 20	Reduce the impact of feral horses
	<p>The RSPCA supports the recommendation to consider the outcomes of the OEH's Independent Technical Reference Group. In particular, the NSW government should ensure that decisions on the choice of control methods be based on objective assessment of their humaneness. The NSW Government should consider implementing measures, such as audits or inspections, to measure compliance with best practice requirements for all large-scale feral animal control programs.</p> <p>Note - the ITRG is referred to in the report as a 'group' and a 'panel'. For clarity the report should clarify the exact group that is being referenced.</p>
Recommendation 22	Actively engage recreational hunting groups in regional pest animal management
	<p>The RSPCA does not support this recommendation which is contrary to the advice provided elsewhere in the Review. Recreational hunting is not considered an effective approach for pest animal control (see page 79). It also poses many risks in terms of animal welfare as outlined in the document Recreational hunting - RSPCA Australia information paper March 2013.pdf</p> <p>The only circumstances under which amateur shooters should be included in pest animal management programs should be when under government supervision, when assessed as competent for shooting accuracy under field conditions and when formal monitoring is conducted to assess efficiency and animal welfare aspects. Compliance with relevant SOPs should be made a licence condition.</p>
Recommendation 23	Reduce red tape surrounding recreational hunting on private land

	The RSPCA does not support the reduction of licencing requirements for shooters on private land. Licenses should require that shooters are assessed as competent for shooting accuracy under field conditions and formal monitoring is conducted to assess efficiency and animal welfare aspects. Compliance with relevant SOPs should be made a licence condition.
Recommendation 24	Maintain access to markets for pest animals
	We recommend that the ‘zero tolerance’ head-shot only requirements for chillers and processors applied in the commercial kangaroo industry be applied to all other commercial field shooting operations such as deer and boar. In addition, all shooters should be required to be competency tested and that adherence to best practice SOPs be made a condition of licencing.
Recommendation 25	Increase non-commercial use of kangaroo carcasses
	Use of non-commercial kangaroo meat for approved baiting programs The RSPCA strongly recommends that requirements for all operators licenced to shoot kangaroos for non-commercial purposes include competency assessment for shooting accuracy and that all welfare related aspects and incentives for commercial kangaroo harvesting are applied to non-commercial shooting of kangaroos.
Recommendation 26	Expand research capabilities
	The RSPCA strongly supports research to develop and evaluate cost-effective and humane control techniques as stated. Suggest adding; <ul style="list-style-type: none"> • <i>Phase-out the use of inhumane methods</i> • <i>Strongly promote the use of the most humane methods</i> • <i>Promote and encourage compliance with codes of practice and standard operating procedures</i>