Question 1

The revised strategy sets out the roles and responsibilities of all stakeholders in pest animal management and prevention. Are these clear?
They would benefit from inclusion of a reference to animal welfare - please see suggestions below.

Under Roles and Responsibilities, Australian Government: page 13
- encourage and support the development and integration of effective ADD 'and more humane' pest animal management strategies at all levels of land management

Under Roles and Responsibilities, State and territory governments: page 14
- encourage the development of effective ADD 'and more humane' pest animal management strategies at local, regional, state and national scales
- continue to work with other jurisdictions and stakeholders to update ADD 'and mandate adoption of' CoPs and SOPs, and consider the animal welfare impacts of pest animal control.

Under Roles and Responsibilities, Industry and community groups: page 15
- help develop and encourage the adoption of codes, policies and plans that improve the effectiveness ADD 'and humaneness' of pest animal management

Question 2
Are the goals and priorities of the strategy focused in the necessary areas? why / why not?
The goals and priorities are quite general but would benefit from inclusion of animal welfare - Perhaps 2.2 Continue to develop and improve best practice management methods ADD 'particularly humaneness' and increase overall adoption of these practices among landholders

Question 3
The strategy is intended to describe how pest animal management fits into Australia’s biosecurity system. Is the link between Australia’s biosecurity system and pest animal management made clear in the strategy? why / why not?
No comment

Comments / Feedback
Any other comments or feedback?
Document attached

Attach a document
File formats allowable are .doc, .docx or .pdf with a maximum file size of 5 MB.
Submission

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Do you consent for the department to contact you about your submission, if required? (required)

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☐ No
Response to Key Questions:

Suggested additional text highlighted below.

1. The revised strategy sets out the roles and responsibilities of all stakeholders in pest animal management and prevention. Are these clear? Why/why not?

Under Roles and Responsibilities, Australian Government: page 13

- encourage and support the development and integration of effective and more humane pest animal management strategies at all levels of land management

Under Roles and Responsibilities, State and territory governments: page 14

- encourage the development of effective and more humane pest animal management strategies at local, regional, state and national scales
- continue to work with other jurisdictions and stakeholders to update and mandate adoption of CoPs and SOPs, and consider the animal welfare impacts of pest animal control.

Under Roles and Responsibilities, Industry and community groups: page 15

- help develop and encourage the adoption of codes, policies and plans that improve the effectiveness and humaneness of pest animal management

2. Are the goals and priorities of the strategy focused in the necessary areas? Why/why not?

The goals and priorities are quite general but would benefit from inclusion of animal welfare - Perhaps 2.2 Continue to develop and improve best practice management methods particularly humaneness and increase overall adoption of these practices among landholders

3. The strategy is intended to describe how pest animal management fits into Australia’s biosecurity system. Is the link between Australia’s biosecurity system and pest animal management made clear in the strategy? Why/why not?

No comment

General comments:

The RSPCA reminds all stakeholders involved in vertebrate pest management that pest animals are sentient, in that they are capable of experiencing pain, distress and suffering and therefore, it is paramount that in all instances, the most humane control methods are used and that justification for using less humane methods should be demonstrated. In addition, ongoing funding must be
provided to develop humane methods as the majority of current control methods used, including trapping, poisoning and biocontrol, are not humane.

It is pleasing that the Australian Pest Animal Strategy (the Strategy) has cited the ‘Principles of effective pest animal management’, where animal welfare is acknowledged in Principles 6 and 7.

6) Best practice pest animal management balances efficacy, target specificity, safety, humaneness, community perceptions, efficiency, logistics and emergency needs.

7) Best practice pest animal management integrates a range of control techniques (including commercial use where appropriate), considers interactions between species (such as rabbits and foxes) and accounts for seasonal conditions (for example, to take advantage of pest animal congregations during drought) and animal welfare.

However, the Strategy lacks sufficient emphasis on animal welfare throughout the document. Recommendations and suggestions have been provided to help rectify this oversight.

Specific comments:

<table>
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<th>Pest Animals in Australia’ page 6, 4th paragraph</th>
<th>Suggest adding the following highlighted text:</th>
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<td></td>
<td>While our knowledge of, and control methods for, preventing and managing the negative impacts of pest animals have improved markedly, significant challenges remain, especially as methods must also meet ethical and welfare expectations.</td>
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On page 10, Figure 2 Reference to the Australian Animal Welfare Strategy (AAWS) Suggest removing AAWS from the diagram as it is no longer functional as a national initiative coordinated by the federal government.

On page 12 under ‘Pest animal management in practice’, Reference to AAWS should be removed except where mentioned in a historical context.

The RSPCA acknowledges the invaluable work undertaken through AAWS to help raise awareness and assist in on the ground improvements in pest animal management. To this end, it is strongly recommended that key stakeholders involved in pest animal management actively support the re-establishment of national leadership in animal welfare as significant benefits can be gained.

On page 12 It is recommended to briefly describe the Model for assessing the relative humaneness of pest animal control methods which was developed by NSW Department of Primary Industry in this section.

Suggest adding the following text: The Model for Humaneness developed by the NSW Department of Primary Industry is an essential tool for pest animal management, as it helps decision makers to choose the most humane methods available. It assesses and ranks pest control methods based on the welfare impact prior to death and the effectiveness to achieve a humane death - instant loss of consciousness and rapid death without consciousness being regained (Sharp and Saunders, 2011). Work continues to be supported to use the model to assess and review as many control methods for different species as possible.
On page 12

It is recommended to add the ‘Principles of humane pest animal management’ as agreed to at a national workshop jointly hosted by the RSPCA, Animal Welfare Science Centre and the Vertebrate Pest Committee, involving a range of stakeholders in 2003 (RSPCA Australia 2004). These principles provide a valuable framework for strategies, plans and work programs relating to welfare considerations pertaining to pest animal management. Incorporating these principles into discussions and planning will help ensure that appropriate aspects are considered to clearly demonstrate that welfare is an important priority.

1. **The aims or benefits and the harms of each control program must be clear. Control should only be undertaken if the benefits outweigh the harms.**

   Control must definitely be necessary, and the benefits must be clearly identified so that they can be maximised and any anticipated harms minimised.

   This requires a sound understanding of the impacts of the pest in each case. It must be decided whether the aim is to reduce or avoid impacts or eradicate the pests, as the control method may be different or conflicting in each case.

2. **Control should only be undertaken if there is a likelihood that the aims can be achieved.**

   If the proposed benefits are not achievable the control program cannot be justified. The probability of benefit needs to be assessed and even if the harms are low, control should not be undertaken if the likelihood of benefit is low.

3. **The most humane methods that will achieve the control program’s aims must be used.**

4. **The methods that most effectively and feasibly achieve the aims of the control program must be used.**

   The method must have the most effective impact on target pests with the least harm to non-target animals, people and the environment. This means that the methods must be appropriate for the species and the situation. The choice will therefore depend on knowledge of which methods can best achieve the aims with the target-species in their particular locations.

5. **The methods must be applied in the best possible way.**

   This is achieved by good quality control applied to, for example, the manufacture, selection, operation, placement, maintenance and effective use of devices, poisons and other components of each control method.
6. **Whether or not each control program actually achieved its aim must be assessed.**

In reality, control programs do not always achieve their aims. Whether or not this is the case must be determined, so that if necessary, methods can be changed to those that are more likely to achieve the desired aims. The real measure of success is whether a pest control program reduces the negative impacts of pests, not merely whether the number of pests is reduced following control.

7. **Once the desired aims or benefits have been achieved, steps must be taken to maintain the beneficial state.**

If that were not done, the control program and any suffering it causes would be purposeless.

8. **Where there is a choice of methods, there needs to be a balance between humaneness, community perception, feasibility, emergency needs and efficacy.**


<table>
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<th>Case study 2</th>
<th>Biological control of the European rabbit (Oryctolagus cuniculus)—the importance of ongoing research and development</th>
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<td>The RSPCA is very cautious regarding past and current biological control agents. For example, this case study in the Strategy promotes the myxoma virus as being a success story, which is true in terms of temporary reduction in rabbit numbers. However, it causes significant suffering and with heightened community awareness and concern regarding animal welfare, it is unlikely that the use of this virus, if presented as a new tool, would be supported today. Similarly, the Rabbit Haemorrhagic Disease Virus (RHDV), although arguably more humane than the myxoma virus, assessment of the impact of RHDV K5 has reported moderate to severe suffering for hours to days of infected rabbits. Therefore, this method should not be relied on for continued rabbit control.</td>
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<td>Other aspects of concern with RHDV, but also of disease-causing biocontrol agents in general, include development of immunity, biosecurity risks, and impact on non-target species:</td>
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<td>• Whilst biocontrol agents can offer effective, short-term control, the inevitable development of immunity by target species severely limits sustainable long-term impacts being maintained. This requires ongoing investment in these control methods where the medium to long-term likelihood of success is unknown.</td>
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<td>• With regard to biosecurity, the original Czech strain of RHDV was accidentally released in 1995 from Wardang Island. In addition, no explanation has been provided for the mystery appearance of RHDV2 in a wild rabbit in the ACT in 2015 which has now spread to NSW, Victoria, Tasmania, South Australia and Western Australia. Even more concerning is that a formal investigation or a review of biosecurity protocols at the CSIRO laboratories where strains for potential release were held has not been conducted. Despite reassurances that the strain of RHDV2 identified was not the same as any of the strains</td>
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imported for evaluation by the CSIRO, it is known that RHDVs can mutate relatively quickly in the field. The RSPCA is very disappointed that the close proximity of the only known location of RHDV2 did not prompt authorities to conduct an investigation to provide evidence confirming that the original incursion of RHDV2 did not originate from the testing laboratory. As this has not occurred, it is not unreasonable that speculation will remain that the possible source of RHDV2 is the CSIRO.

Another concern regarding the use of RHDVs is the high risk posed to valuable rabbits. These agents must not be released until an effective vaccine is available to provide protection to domestic rabbits. Currently, there is concern regarding the claims that the Cylap® vaccine will provide protection against the new K5 strain, due to be released, on the basis of a small pilot study conducted by the NSW Department of Primary Industry. The RSPCA and others are concerned that the pilot study has not been validated and that the methodology would not be considered sufficient to meet vaccine registration requirements. Given that K5 differs from the original Czech strain to which Cylap® is effective, it is not unreasonable to seek full evaluation to confirm the level of protection conferred by Cylap® against K5 before it is released. In addition, despite the understanding that RHDV2 is being evaluated for potential use for biocontrol, there is no evidence that work has commenced on a locally developed vaccine.

For the reasons outlined above, the RSPCA recommends that RHDV is not pursued as an ongoing control method for the future but that alternative, humane methods are developed including investment in research on fertility control.

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<th>Case study 4</th>
<th>PAPP - a new complimentary tool in the fight against pest animals</th>
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<td>For decades, the RSPCA has urged the development of more humane methods for controlling pest animals and has been encouraged by the release of PAPP. However, despite the existence of the antidote, methylene blue, it is disappointing that the limitations of its use were not more clearly stated during the development phase of this new bait. In practical terms, these limitations mean that reversal of poisoning in non-target dogs or cats will be extremely difficult to achieve. It is feared that this will severely limit the uptake of PAPP.</td>
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<td>In addition, it is understood that 1080 will remain the main toxin used for wild dog and fox control, which from an animal welfare perspective is unacceptable. As with other baits where more humane options are available, strict control to ensure that minimal use and/or prohibition of inhumane baits should be pursued. This has not happened and requires urgent attention by authorities.</td>
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