



COMMONWEALTH OF AUSTRALIA

Official Committee Hansard

**HOUSE OF  
REPRESENTATIVES**

STANDING COMMITTEE ON AGRICULTURE, FISHERIES AND  
FORESTRY

**Reference: Impact on agriculture of pest animals**

WEDNESDAY, 1 JUNE 2005

CANBERRA

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**HOUSE OF REPRESENTATIVES**  
**STANDING COMMITTEE ON AGRICULTURE, FISHERIES AND FORESTRY**

**Wednesday, 1 June 2005**

**Members:** Mr Schultz (*Chair*), Mr Adams (*Deputy Chair*), Mr Martin Ferguson, Mr Michael Ferguson, Mr Forrest, Mr Lindsay, Mr Gavan O'Connor, Mr Secker, Mr Tuckey and Mr Windsor

**Members in attendance:** Mr Adams, Mr Michael Ferguson, Mr Forrest, Mr Lindsay, Mr Gavan O'Connor, Mr Schultz, Mr Secker and Mr Windsor

**Terms of reference for the inquiry:**

To inquire into and report on:

The impact on agriculture of pest animals particularly:

To identify nationally significant pest animal issues and consider how existing Australian and State government processes can be better linked for more coordinated management of these issues across State boundaries.

To consider the approaches to pest animal issues across all relevant jurisdictions, including

- (i) prevention of new pest animals becoming established;
- (ii) detection and reporting systems for new and established pest animals;
- (iii) eradication of infestations (particularly newly established species or 'sleeper' populations of species which are considered to be high risk) where feasible and appropriate; and
- (iv) reduction of the impact of established pest animal populations.

Consider the adequacy of State Government expenditure on pest animal control in the context of other conservation and natural resource management priorities, with particular reference to National Parks.

Consider the scope for industry groups and R & D Corporations to improve their response to landholder concerns about pest animals.

Consider ways to promote community understanding of and involvement in pest animals and their management.

**WITNESSES**

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**Committee met at 5.07 pm**

**STEENSBY, Mrs Cindy, Acting Director, Sustainable Wildlife Industries, Department of the Environment and Heritage**

**TRIMMER, Mr Mick, Acting Assistant Secretary, Wildlife Trade and Sustainable Fisheries Branch, Department of the Environment and Heritage**

**CHAIR (Mr Schultz)**—Welcome. I declare open this public hearing of the House of Representatives Standing Committee on Agriculture, Fisheries and Forestry inquiry into the impact on agriculture of pest animals. Today's hearing is the third in a series of five public hearings taking place in Canberra. Today we are hearing from the Department of the Environment and Heritage—Sustainable Wildlife Industries and Wildlife Trade—and the Australian Pesticides and Veterinary Medicines Authority. In addition to further public hearings, the committee will visit Perth and Broome in July prior to drafting its report.

Although the committee does not require you to give evidence under oath, I should advise you that these hearings are formal proceedings of the parliament, and consequently they warrant the same respect as proceedings of the House itself. It is customary to remind witnesses that giving false or misleading evidence is a serious matter and may be regarded as a contempt of parliament. The committee has asked you to attend today to provide us with information about wildlife trade management plans that are required for the commercial export of wildlife products. The committee notes that these plans can be used to allow the commercial export of some native species considered to be pests. Would each of you care to make an introductory statement?

**Mr Trimmer**—I am happy to make an introductory statement, if you like.

**CHAIR**—Please feel free to do so.

**Mr Trimmer**—I would like to preface my remarks by saying that the subject of this inquiry, feral pests, is not a matter that is within the program that I am responsible for, mainly because we consider our native wildlife as a renewable sustainable resource, not as a pest.

The functions I am responsible for within the wildlife trade branch are along three main lines. The first is to regulate the import and export of species which are listed under the Convention on International Trade in Endangered Species of Wild Flora and Fauna. The second is to regulate the import of live animals and plants that come into Australia. The third is the export of Australian native species. It is the latter activity that I will address here today.

The Australian government's role in managing our native wildlife is a responsibility that is shared with the state and territory governments. It is to ensure that the wildlife that is traded overseas is used sustainably and, where animals are involved, humanely. The international movement of wildlife and wildlife products is regulated under part 13A of the Environment Protection and Biodiversity Conservation Act 1999, otherwise known as the EPBC Act. Under the act the commercial export of products derived from wild harvested native animals can occur only if sourced from a wildlife trade management plan or a wildlife trade operation. A wildlife trade management plan is generally used for large broadscale harvests such as crocodiles,

kangaroos and possums, and is typically submitted by a state or territory agency responsible for managing the species.

The management plan sets out the arrangements for ensuring that the species are used on an ecologically sustainable basis and, for animals, humanely. These arrangements include monitoring, licensing, tagging and determining quotas and providing background information on relevant legislation, biology and conservation status of the species, and the likely impact of the proposed harvest on the species and ecosystems they inhabit. The department has developed a model management plan to assist the state and territory agencies with the development of their plans. Currently there are management plans approved for kangaroos and crocodiles and for flora generally. Wallaby management plans for Flinders and King Islands in Tasmania have recently been submitted and are currently being assessed. The department expects the Tasmanian government to submit a possum management plan in the near future.

For animal related wildlife trade management plans, the animal can be killed in the field, trapped live and transported to a farm or abattoir or harvested as eggs and raised on farms to a marketable size. For example, kangaroos are killed in the field; possums are shot in the field or trapped and transported to an abattoir; and crocodiles may be harvested in the field, trapped live and transported to farms or harvested as eggs which are hatched and raised to marketable size. To be approved, a wildlife trade management plan must assess the environmental impact on its conservation status, its habitat and ecosystem, and the impact of harvesting the species. It must have management controls in place to ensure that the impact of the harvest upon the species and the ecosystem is ecologically sustainable, that the harvest is non detrimental to the survival of the species and ecosystem, that monitoring is implemented to identify, mitigate and minimise environmental change that impacts on the species and ecosystem and that, in the case of animals, welfare requirements are met.

In regard to animal welfare, a wildlife trade management plan cannot be approved unless the conditions specified under the regulations are likely to be complied with. The regulations limit welfare considerations to mammals, reptiles, birds and amphibians, and require that the animal be taken, transported and held in a way that is known to result in minimal stress and injury or risk of injury to the animal and that, when the animal is killed, it is done in a way that is generally accepted to minimise pain and suffering.

Animal welfare committees and endorsed codes of practice are used in determining appropriate methods for taking, transporting, holding and killing animals. In the case of kangaroos, the accepted standard for killing kangaroos is the national code of practice for the humane shooting of kangaroos. In the case of live trapping of possums, it is the code of practice for the capture, handling, transport and slaughter of brush possums developed by the Tasmanian Animal Welfare Advisory Committee. As the management plan can be approved only if these conditions are likely to be complied with, the management plan must include provisions dealing with compliance. For example, kangaroo management plans include random inspections of chillers and processors, require shooters to undergo training and pass a shooting accuracy test, include compliance with the national code as a condition of the licence and ensure carcasses are sequentially tagged enabling the carcass to be traced back to the shooter.

In the case of a wildlife trade operation, this is used for fisheries and smaller operations for market testing for a small-scale activity or for a developmental operation. Small-scale and



market-testing wildlife trade operations are small and likely to have a low impact. A developmental wildlife trade operation is designed to collect data and develop monitoring programs for the development of a wildlife trade management plan. For a non-fishery wildlife trade operation, the applicant is usually an individual or a company, although a developmental wildlife trade operation may be submitted by a governmental agency. Currently approved wildlife trade operations exist for invertebrates like insects and for flora. There are no wildlife trade operations approved for terrestrial vertebrates.

Guidelines for applying for a wildlife trade operation are included on the department's web site. The applicant must provide a proposal in a form suitable for publishing on the web site which includes sufficient information to enable informed public comment on it and to assess it against the relevant legislative criteria. Requirements for approving a wildlife trade operation include requirements that the harvest must be non detrimental to the survival of the species and the ecosystem and, in the case of animals again, that animal welfare requirements are met.

The general procedures under which we operate for both a wildlife trade operation and a wildlife trade management plan are as follows. The applicant applies for approval of either plan. The department does a preliminary assessment to see if a proposal or a plan meets the legislative requirements. The department liaises with the applicant over any necessary changes to the plan. The plan is placed on the department's web site for public comment for a minimum period of 20 business days. Comments are received and allocated and a list of comments is provided to the applicant to consider and, if appropriate, revise the proposal or the plan. The applicant provides responses to the comments and, if necessary, a revised plan. The department considers final assessment and provides advice to the minister or the delegate. The minister or the delegate makes a decision on whether to approve the plan. They then sign the declaration if the decision is to approve. If it is approved, the declaration is gazetted in the Commonwealth *Gazette*. Exporters can apply for and be issued with export permits based upon the approved plans.

**CHAIR**—Thank you very much for that. Mrs Steensby, do you want to make a contribution?

**Mrs Steensby**—No.

**CHAIR**—I will lead off by saying to you that in the evidence we have taken so far we have had people say to us that they believe native pest animals in particular are a sustainable resource for them to use. So there are a lot of people out there who have a like-minded attitude to it to you. We visited the small-game abattoir in Tasmania. One of the problems we noticed is that there seemed to be no allowance for the processing of the by-products of those animals, such as skins, offal for pate and those sorts of by-product elements that can have a very positive impact in creating an industry and, more importantly, creating work. What products produced from native vertebrate animals are currently exported under approved wildlife trade management plans?

**Mr Trimmer**—My understanding is that skins, furs and meat are exported. These animals cannot be exported live because there is a general prohibition, as you are probably aware, on the export of live native species. But they are exported for their products which are, generally speaking, their meat, skins or furs.

**Mr LINDSAY**—Is that our prohibition or a worldwide prohibition?

**Mr Trimmer**—No. Within the context of Australian legislation, there is a prohibition on the export of live native species for commercial purposes. They are allowed for export for non-commercial purposes.

**Mr LINDSAY**—Like a zoo.

**Mr Trimmer**—Yes, for zoological exhibition or for research purposes.

**Mr LINDSAY**—Any idea why?

**Mr Trimmer**—It is a historical thing. It is an application that has been longstanding and I think it is based upon the general community view that Australian animals should not be exported live for commercial purposes. Every time there is an inquiry into the legislation, there is an overwhelming contribution from animal welfare groups, animal rights groups and the general public opposing such a move. Governments from time to time when they have reviewed the legislation have not found it suitable to change the policy.

**Mr LINDSAY**—They have not been game to change it.

**CHAIR**—I do not want to put you in a difficult position, but wouldn't that attitude by governments of all political persuasions, with regard to native animals not being exported, be one of the reasons why we have such a booming trade in the illegal capture and exporting of these sorts of animals? That sadly results in the death of those animals because of the way it has changed. Do you think that that attitude is creating a serious problem in terms of promoting the illegal trade that occurs?

**Mr Trimmer**—It is hard to say. Governments of the day, including at the last review when Senator Hill was minister, have decided not to change the law. But that view has certainly been put strongly to governments and to various inquiries over a substantial period of time.

**CHAIR**—By whom?

**Mr Trimmer**—By a range of stakeholders interested in both animal welfare and the animal export industry.

**Mr SECKER**—How long ago was that review?

**Mr Trimmer**—It was in 2001, wasn't it?

**Mrs Steensby**—It was a Senate inquiry into the sustainable use of wildlife.

**Mr Trimmer**—Yes. It was 1998 or 1999, from memory.

**Mr SECKER**—It is about time we had another one, I reckon.

**CHAIR**—I will leave it open for questions. Patrick, have you asked your questions?

**Mr SECKER**—Pretty well. I was leading into the same sort of thing. We have huge numbers of cockatoos in Australia, and it would be quite sustainable to use them as a live export under certain conditions. We do not do it because of this rule. I had not realised that that was part of the law. How long does the process take to get the management plans from the state level to the federal level? If a state does not want to do it, there is no way a federal government can say, 'We'll do a management plan,' is there?

**Mr Trimmer**—The time it takes really depends on the quality of the application and whether it meets the federal legislative criteria. It is a bit like asking, 'How long is a piece of string?' It depends on—

**Mr SECKER**—All things being right—

**Mr Trimmer**—If it is done very effectively and efficiently, we are talking about a few months.

**Mrs Steensby**—We would generally say three to four months.

**Mr Trimmer**—If a state does not produce a management plan, it can be done by other means. A private individual or a company can make an application to have a plan approved if they do the required work and meet the legislative criteria. For example, wildlife trade operations, which tend to be the smaller plans based upon smaller wildlife activity, generally speaking are done by private individuals.

**Mr SECKER**—So an individual could bypass a state government?

**Mr Trimmer**—Yes. There is nothing to stop a company or a person introducing or submitting to us a larger plan, a wildlife trade management plan covering a whole state. But generally speaking you just do not get that sort of approach coming from the private sector, mainly because private people tend to be focusing on a particular area or localised industry, whereas the state produces the plan in order to cover all activities within its jurisdiction to allow the industry or industries within its jurisdiction to develop and prosper.

**Mr SECKER**—So, in effect, that makes it almost impossible for an individual, unless they had heaps of money behind them and were prepared to do all the work, to actually bypass the state government?

**Mrs Steensby**—It depends on what the species is and what the government controls are in the states. The current wildlife trade operations that we have approved have been for, as Mick was saying, invertebrates, which are beetles and things like that, which is where the states are not regulating. Therefore, the individual will apply for the harvest on their property or a property they have access to. They will apply and we can approve that.

If somebody in Victoria wanted to harvest kangaroos or somebody in South Australia wanted to harvest cockatoos for meat, it would be harder to do because those animals are protected under state legislation and, therefore, you would have to have that state licence to be able to do it. So a state might not want to do a management plan but, in the case of an animal that is

protected in that state which requires a permit to be able to kill, injure or take, they would have to demonstrate that they have got that state approval.

You cannot totally bypass the state, but you can bypass it in that you can do the management plan as long as they are willing to tick off under their legislation the use of that animal. In some cases, which tend to be the smaller insects, it is because they are not regulating that animal and in other cases they might say, 'We'll licence you to do that harvest, but we're not going to submit the plan.' That is why there are no vertebrates at the moment.

**CHAIR**—Can I come in on that point. The reason why I asked the initial question was because in Tasmania recently this committee heard evidence from a man from Lenah Game Meats about problems he was having with the export of wallaby skins and fur. We understand that this was due to the absence of a wildlife trade management plan approved by the Tasmanian government. So he was processing wallabies and he was processing possums and exporting them to Asia and to Europe, but at the same time he could not process the skins or the offal because of that particular impediment. That is why I asked the original question. Have you any knowledge of any of that sort of thing happening? How can it be overcome?

**Mrs Steensby**—When the management plan was approved, there was nothing in the management plan that said the offal and the skins could not be utilised as well. I think the reason they cannot use the offal might have to do with—

**CHAIR**—Inspection.

**Mrs Steensby**—inspection and health types of things.

**CHAIR**—That should not be applicable to the skin, though. I am out of the meat processing industry so I can understand the offal needing inspection, but I cannot understand why you would be restricting the skin.

**Mrs Steensby**—The reason he could not export the skins is because there was not an approved plan. If there was an approved plan—and there had been an approved plan for wallabies up until 2002 on Flinders and King Islands—then that expired in 2002. Since then, he has not been able to do the skins of the wallabies. To my knowledge, he has not wanted to export the skins of the possums.

**CHAIR**—That is not true. It is the fur.

**Mr MICHAEL FERGUSON**—I think we are getting our processes mixed up there.

**Mrs Steensby**—There is somebody else who wanted to do the possums.

**Mr ADAMS**—Lenah—

**CHAIR**—It is mainly the wallabies.

**Mr ADAMS**—It is the fur from the skin. The possums are not skinned; they take the fur off.

**CHAIR**—Sleeve skinned.

**Mrs Steensby**—That is not saying that, once the plan is approved, you can export the skin or you can export that. It is just a matter of having it approved.

**Mr ADAMS**—It depends on whether you have a management plan.

**Mrs Steensby**—Or a wildlife trade operation.

**Mr ADAMS**—There was not one on King or Flinders because it had run out of time and it needed to be redone.

**Mr Trimmer**—That is right. We know the people involved with Lenah and we have generally had a long and happy relationship with them. In order to facilitate his business and so that he could export where there was demand for his product, we provided exceptional circumstance permits to allow Mr Kelly to export over a six-month period, at his request. Even in the absence of a plan, we have the ability to do that where we make a finding that it will not adversely affect the species and so forth. But my understanding is that, even though we provided that opportunity, he did not take it to export to where he thought he might want to.

**CHAIR**—He may have been confused. Perhaps you might take it on notice to go back and tell him what his rights are with that, because that is not the impression we got when we were there.

**Mr LINDSAY**—In your opening comments you said that you considered native animals a sustainable resource, but I think deep down you would concede and know that there are some native animals in some places that are pests.

**Mr Trimmer**—They are considered pests; that is right.

**Mr LINDSAY**—You do not have any difficulty with that, because it is just a fact of life. These management plans and these little places all around the country dealing with all of that sort of stuff—is there another way to deal with that? We also have to deal with the fact that each state has different regulations. Is that right?

**Mr Trimmer**—Yes.

**Mr LINDSAY**—Is there another way of dealing with that? Could you as an overarching federal department say, ‘Look, we know that wallabies and possums are a problem and we want to do something; we want to facilitate the export of these things in a sustainable way’? Could you produce a draft management plan so that all the little people around the place could say, ‘There is a draft; now I’ll fill in the blanks, get it approved and it’ll be really quick and easy’? Could you do that?

**Mr Trimmer**—Yes, we could. In fact, we have done it to a certain extent, because we have what we call a draft model management plan. We have done that for both flora and fauna.

**Mr LINDSAY**—Would that work across the states?

**Mr Trimmer**—Yes. They are plans which are quite generic in their nature because, as you say, each state is responsible for the management of its own wildlife. We only come into play because people wish or the state wishes to export. Each state may have a separate set of rules or regulations to another state. But our basic criteria require that it be ecologically sustainable and that, with animals, it be humane. So, broadly speaking, we take into account the requirements of each state, but each state must comply with those two basic requirements: that it be sustainable and that it be humane. They are not difficult. What the states need to do is ensure that they have the mechanisms in place or that the individuals have the mechanisms or the ability to meet those criteria of sustainability.

**Mr LINDSAY**—Moving on from there: as the years go on, there is this constant concern from people trying to make a dollar—properly—that it just gets harder and harder and there are all these extra controls. I will give an example. We had a dogger in Leonora. He said, ‘For decades I’ve been shooting dogs. Now I have to go and prove I can actually shoot a dog.’ That is just a little example of how it goes on and on. What I am leading to is: can you see a way that perhaps in your industry, in your area of responsibility, we could reduce all this red tape to make it easier for people to do what they want to do but within the criteria you are required to consider? Do you think there is too much red tape there at the moment? Why does it take months to get a permit? I know that is pretty wide ranging.

**Mr Trimmer**—It depends whether you are talking about a permit or a management plan—

**Mr LINDSAY**—A management plan or whatever it is.

**Mr Trimmer**—because they are two different steps in the process.

**Mr LINDSAY**—I understand that. But do you ever think to yourself, ‘Gee, can we reduce all these requirements but still get the outcome we need?’

**Mr Trimmer**—We have done it over time. There was a review. You might recall that the previous legislation was called the wildlife protection act, and that was in force between 1984 and 2001. The Environment Protection and Biodiversity Conservation Act came into being in 2000. There was a subsequent review in 2001 and amendments were passed to the EPBC Act which incorporated the wildlife protection act, which essentially covered all the wildlife trade provisions and our obligations under CITES. Those legislative provisions became effective in January 2002, but that process included a review where we streamlined many of the provisions. We think we made some contribution towards—

**Mr LINDSAY**—So you are mindful of that.

**Mr Trimmer**—We are very mindful of it because we have a dual objective of ensuring that the use of animals and plants is done sustainably, and humanely where animals are involved, in the context of having well-run, profitable and thriving regional communities.

**Mr LINDSAY**—How long is the usual process for development of a management plan at state level and approval by the federal minister?

**Mr Trimmer**—Again, it is very hard because it depends on when it starts. It depends on the state government. For example, with the Tasmanian government, it has been a rather extended process of getting the management plans for Flinders and King islands approved. We were ready to assess them a long time ago, but that was not possible, for reasons beyond our control. In other circumstances, for example, in Queensland and New South Wales, we tend to turn them around very quickly because the state agencies in those jurisdictions have well-established operations for the development of management plans, they have a strong relationship with us and we tend to get them out the door very quickly. They are quite large operations, actually. We are talking about millions of kangaroos being approved for harvest over a huge area of land.

**Mr LINDSAY**—Can you suggest to this committee anything we might recommend to speed up the process where it is slow?

**Mr Trimmer**—I can take that on board and come back to you on it.

**CHAIR**—That might be beneficial. I am conscious of the fact that, when you have to go through a management plan and seek approval, if somebody only wants to get into the game export business, whether it is indigenous game or whatever, they may already have a processing plant in their state that is capable of taking the carcasses. But, if somebody is starting from scratch and has to build a new facility in a state, it can obviously take a long time. I suppose that contributes to the complexity of the answer. Take it on board. It would be great if we could get that answer.

**Mr LINDSAY**—Thank you.

**Mr MICHAEL FERGUSON**—My question is in relation to the Tasmanian situation. You have mentioned King and Flinders, but I am interested specifically in Flinders at the moment. I believe that, in the process of the federal approval for the game management plan for the macropods, there was a problem at one point with the use of firearms and whether rim fire was good enough or perhaps the weapon of choice had to be centre fire. Was that a sticking point? Where is that now and what reflections might you make on preventing that sort of hang-up in the future?

**Mr Trimmer**—It was an issue that we had to discuss with our Tasmanian colleagues in the Department of Primary Industries, Water and Environment down there. The controls on rifles for the shooting of kangaroos or macropods for export purposes are determined through a national code for the humane shooting of kangaroos. That code has been agreed on by all wildlife agencies, through the states, territories and the Commonwealth, as the applicable code for the shooting of kangaroos for commercial purposes. That code specifies that centre fire rifles be used.

**Mr MICHAEL FERGUSON**—Is that a nationwide code?

**Mr Trimmer**—Yes, that is right. We tend to apply that, and successive ministers have endorsed that approach. It is reflected in the legislation and the regulations by reference to a note to the regulation. It does not mean it has to be used. The note really is a mechanism to give an indication as to what is acceptable in terms of meeting the welfare requirements, as I understand it. We negotiated with the Tasmanians and they have applied the centre fire rifle requirement in

relation to previous plans on Flinders Island. They have been using that, but it has been a sticking point in relation to whether or not the Tasmanian government wants to develop a management plan for the commercial use and export of wallabies and so forth on the mainland.

A review of the national code is happening at the present time under the Natural Resource Management Ministerial Council. A working group has been formed comprising all state and territory wildlife agencies and some relevant non-government people, including the RSPCA, the shooters association, the kangaroo industry and so on. That is being chaired by the Western Australian Department of Conservation and Land Management and we are midway through that review. It is taking a bit too long but, as Western Australia is chairing it, it is a bit beyond our control at the moment. We are hoping that review will be finished by the end of the year.

In negotiating with the Tasmanian government for the development of management plans on Flinders and King Islands, at the end of the day we were willing to compromise on that point. The federal Department of the Environment and Heritage took the initiative in saying, 'We are willing to compromise on that point by allowing those management plans to be approved, with the condition that the rim fire rifle may be used in the Flinders Island and King Island context for the period remaining that the review is in place.' At the end of that review period, once the Natural Resource Management Ministerial Council has made a determination on that code of practice, the Tasmanian management plan will then comply with that final decision. Whether that means they have to revert back to centre fire or they may continue using rim fire obviously I cannot say until the ministers make a decision. But we were very conscious of that issue and we were willing to make a compromise in order to facilitate the development of those plans so that people could start harvesting the wallabies and make sure the export industry was not in any way prevented or handicapped.

**Mr MICHAEL FERGUSON**—You have said who will have an input into that review, but who makes the decision?

**Mr Trimmer**—The Natural Resource Management Ministerial Council.

**Mr MICHAEL FERGUSON**—So the state and territory environment ministers and the federal environment minister?

**Mr Trimmer**—Yes. It will be Senator Campbell and Minister Truss at the federal level.

**Mr WINDSOR**—You mentioned earlier that for game meat in Tasmania the Commonwealth issued a licence or a permit to operate outside the state jurisdiction. Is that possible to do with live birds?

**Mr Trimmer**—No.

**Mr WINDSOR**—Why is it possible to do it—

**Mr Trimmer**—Because there is a prohibition. The legislation gives you—

**Mr WINDSOR**—But how can you operate outside the state? How could you issue that licence?



**Mr Trimmer**—Because the legislation provides for exceptional circumstances at section 303GB of the EPBC Act.

**Mr WINDSOR**—But the animal has to be dead.

**Mr Trimmer**—Yes, that is right. But it allows us to permit an export outside the framework of a management plan, subject to a range of specified conditions. So effectively the main principles embodied in the legislation are still covered.

**Mr WINDSOR**—So to arrange the export of live white cockatoos, for instance, that Mr Secker was talking about, the state would have to concur.

**Mr Trimmer**—No.

**Mrs Steensby**—The federal legislation would have to be changed.

**Mr Trimmer**—You would have to persuade your colleagues in the parliament to amend the legislation to enable that to happen.

**Mr WINDSOR**—Mr Secker would have to persuade his colleagues.

**Mr Trimmer**—I meant your parliamentary colleagues, yes. You would need a majority in the House of Representatives.

**CHAIR**—It is a reasonable question. That was basically the thought behind my comments about the illegal trade and how it is killing birds and mammals and other species that could be used, through a legitimate export trade, to put some money into the economy of Australia.

**Mr WINDSOR**—It would require a change in the act at the Commonwealth level.

**Mr Trimmer**—Yes.

**Mr WINDSOR**—If the act has changed at the Commonwealth level, what other hurdles have to be jumped then?

**Mr Trimmer**—Basically the Commonwealth legislation and possibly state legislation, depending on what the legislation provides there. I am not aware of any prohibition. Victoria probably would not allow it at the moment, but I am not aware of what the other states have on that specific provision. We have never had to worry about it because there has always been a limitation on the federal legislation, which is what we are responsible for.

**CHAIR**—Who has carriage of that: the minister for the environment and the minister for agriculture?

**Mr Trimmer**—That issue would be predominantly with Senator Campbell.

**CHAIR**—We might have to get Senator Campbell in and ask the question.

**Mr ADAMS**—Recently I went to New Zealand. They sell a lot of fur through their tourist outlets. There are gloves made of possum fur mixed with merino wool. There are furs that you can buy just as furs. It seems to be an enormous trade. Is there anything in Australia that prohibits, from a federal department point of view, that skin trade? Other than what we have talked about here, there is no prohibition on furs being sold or exported?

**Mr Trimmer**—No. You can export any fur, skin or whatever from an exotic species. There are no federal regulations preventing that from an environmental perspective.

**Mrs Steensby**—You are talking about possums, right?

**Mr ADAMS**—Possums and wallabies.

**Mr Trimmer**—With natives you are allowed to do it subject to management plans.

**Mrs Steensby**—They had a possum management plan up until the end of 2004 and it expired then. There was nothing stopping anybody from developing their fur market, skin market or carcase market. Any one of those things could have happened under that management plan. Historically, initially most of the possums that were being killed for commercial purposes were for the fur market and then the fur market crashed, so they just have not got back into it—although some people are doing it now.

**Mr ADAMS**—It was big. It used to be very big in Tasmania. It has now crashed. I do not think it was only the market; it was the market driven by other circumstances. The department does not have any brief to encourage or look at opportunities for exporting wildlife products?

**Mr Trimmer**—Not in terms of industry development. That tends to be a state responsibility. If it were a federal responsibility, you would be looking at the Department of Foreign Affairs and Trade perhaps or the Department of Industry, Tourism and Resources. But from the environmental perspective, we have the ability to facilitate it through our environmental legislation but we are not market promoting it, if you like.

**Mr ADAMS**—You are happy that it meets federal obligations of sustainability—through tagging and keeping check on what numbers are being knocked down—and that it is done in a humane way, reaching the standards set by federal legislation or regulation?

**Mr Trimmer**—That is right. The main two criteria are ecological sustainability and humane killing.

**CHAIR**—I am conscious of the time and we have to call other witnesses. I thank you, Mr Trimmer and Mrs Steensby, for the open and frank way you have given evidence here today. It is very important from this committee's point of view that we hear it openly and frankly. We appreciate the time you have given here to put some evidence into this inquiry. Thank you.

**Mr Trimmer**—If anyone wants to contact us about any follow-up questions, we are always available to talk on any question in relation to this and provide information, or just seek help, whether it be you or your constituents.

**CHAIR**—Thank you.

[5.49 pm]

**BENNET-JENKINS, Dr Eva, Program Manager, Pesticides, Australian Pesticides and Veterinary Medicines Authority**

**SMITH, Dr Roland Joseph (Joe), Chief Executive Officer, Australian Pesticides and Veterinary Medicines Authority**

**PITT, Dr Ian George, Assessor, Chemical Assessment Section, Environment Protection Branch, Department of the Environment and Heritage**

**CHAIR**—Welcome. Would you like to give the committee any additional information about the capacity in which you appear?

**Dr Pitt**—I work in the Department of the Environment and Heritage, but most of my work is done under contract to the APVMA and that includes the present hearing. My job is to provide environmental advice to them.

**CHAIR**—Although the committee does not require you to give evidence under oath, I advise you that these proceedings are formal proceedings of the parliament and consequently they warrant the same respect as proceedings of the House itself. It is customary to remind witnesses that giving false or misleading evidence is a serious matter and may be regarded as a contempt of parliament. The committee has asked you to attend today to provide information about the recently released preliminary findings of the APVMA's review of 1080 poison. The committee is also interested to hear about the registration process for agricultural chemicals, particularly baits and other products used for pest animal control. Would you like to make an introductory statement?

**Dr Smith**—Yes, I will make some brief introductory comments. I am sure you are familiar with the role of the APVMA. We are the Australian government authority that is responsible for the regulation of both agricultural and veterinary chemicals. We regulate them up to the point of retail supply. We operate in a partnership under the national registration scheme with the states and territories, which have responsibility for control of use. We do not have a policy role within government; we have a role of acting within the agricultural and veterinary chemicals legislation.

All pesticides and veterinary medicines supplied in Australia must be registered or permitted by the APVMA and, to do this, our legislation specifies very clear criteria that we must be satisfied on before we can allow that to happen. Those criteria relate to the fact that they work, they are efficacious, and they pose no undue risk to human health, the environment, crops and animals or trade and agricultural produce with other countries. In undertaking our evaluations, we receive expert advice from the Department of Health and Ageing on matters relating to health risks and occupational health and safety, and from the Department of the Environment and Heritage in relation to environmental assessment and environmental risk. Dr Pitt is here in that regard today. We also receive expert advice from the states in relation to the efficacy evaluation of products that we register.

We have an ongoing chemical review program, and this is where we come to the 1080 review. Our chemical review program is aimed at reviewing older chemicals that have been on the market for some time. We review them in the light of experience with their use or issues that might have become apparent through experience or through changing international scientific standards to see that they still meet contemporary registration standards. The review process is very public and very open.

The 1080 review commenced in 2002 with a scoping document. There was a very high level of interest in this review—in fact, it is fair to say that it registered the highest level of interest of any chemical review that the APVMA has ever done. There were over 260 submissions in response to the scoping document. Most of those submissions related to farmers and farmer organisations who were concerned about the potential loss of access to 1080, but a number of submissions related to concerns about off target animal harm and animal welfare concerns.

As well as those submissions, we had extensive material submitted to the review—over 150 scientific studies. All of those have been assessed, primarily by the Department of the Environment and Heritage. Our review is focused on the legislative criteria under which the APVMA operates. Those criteria do not include animal welfare considerations. The key issues evaluated in the review include the potential for harm to off target animals and the environment and questions about whether existing frameworks, instructions and labels were adequate for safe and effective use of 1080.

We sought input from the national Vertebrate Pests Committee which advises the Natural Resource Management Ministerial Council, which is chaired jointly by the Commonwealth ministers for agriculture, fisheries and forestry and the environment and heritage. We liaised with them throughout the review. We have now released a preliminary review findings report for a period of three months for public comment. The process is that we will consider the comments and release the final findings of the review after that. It is a very public process. As you have indicated, members of the committee are obviously aware of the report and its general content.

Perhaps I could address you for five minutes and make a few specific comments on 1080. The supply and use of 1080 is regulated by a combination of Commonwealth and state legislation, so there are already a number of controls in place: 1080 is a schedule 7 poison and it is also a restricted chemical product under our legislation. That essentially means that it can only be used or supplied to authorised people. We can talk about the detail of that authorisation if are you interested. The review findings essentially conclude that significant contamination of air, soil and water by 1080 is not an issue, as the applications are relatively low and it is readily degraded in surface soil, waters and living organisms. Assessment of adverse incidents and field observations concluded that non-target animal impacts are limited to individual animals and do not result in significant impact on the species' population levels. That is an important criterion for environmental assessment, and perhaps Dr Pitt might be able to expand on that if the committee wishes.

However, the review did conclude that appropriate bait materials, optimum dose of 1080 in baits, correct bait placement and timing are essential to minimise the impact on non-target animals. The review found that the current labels for 1080, many of which have been around for many years, do not contain adequate instructions. The review recommends that labels be varied to include comprehensive instructions for use, such as clearly specifying target pests, 1080 dose

rates, bait materials and size, bait preparation, the storage and transportation of baits, neighbour notification about imminent baiting, minimum distance requirements for bait placement and the requirement for signage. It also noted that ecosystems in which the products are used vary in different regions and that it is important that use practices are tailored to each ecosystem to optimise the target selectivity and to minimise off-target effects.

Current supporting materials available to users of 1080, such as codes of practice, manuals or standard operating procedures as developed by relevant state departments, cater for the specific needs of individual state systems but are not currently part of the approved label. The review is recommending at this stage that these very specific instructions should continue to be provided in the form of state based documents but that their content and availability—and this is part of the tightening up of the controls—is made a specific condition of the product registration. So it is a way of making sure that all of these information tools are made available to people who are using 1080. That was what I was going to say by way of introduction, and we would be more than happy to answer any questions.

**CHAIR**—Thank you very much, Dr Smith. Can I say to you at the outset that the committee heard evidence from Dr Tony Peacock of the Pest Animal Control Cooperative Research Centre that the registration process for new chemical products is very time consuming and should be truncated. For example, the calicivirus bait has been with the APVMA for five years but has not yet been approved. How do you respond to that?

**Dr Smith**—I will respond to it generally and perhaps in relation to the calicivirus. Generally, the registration process has time frames which are set in legislation—in schedules 6 and 7 of the regulations to the Agricultural and Veterinary Chemicals Code Act. The evaluation time ranges from three months to a maximum of 15 months—the 15 months being if it is a brand new chemical or product. That is the actual time for the registration process. During that process, though, applications are quite often deficient for one reason or another. They do not have sufficient data or information provided with them, so we have to go back to the applicant and seek further information. That is quite often a reason for the elapsed time for an evaluation expanding further than the 15 months.

**Mr ADAMS**—How much information do you give the person who is applying for the registration prior to them submitting it to you? If you give them the information on what they have to supply you with and they do not supply it, I can understand; but if they do not know what they have to give you—

**Dr Smith**—I have a couple of comments on that. We have very extensive manuals of requirements and guidelines, which we are currently revising extensively to line up with the introduction of the new cost recovery framework for the APVMA, which I am sure members of the committee will be aware of. There is that. We also willingly and readily meet with applicants or potential applicants for registration before they submit their application to go through the requirements and to clarify any details. Having said that, there are quite often questions about or deficiencies in the information that is provided to us.

**Mr ADAMS**—The evidence we have received is that it takes a bloody long time to get it done.

**Dr Smith**—All I can say in general terms is that our time frame performance historically has been that in excess of 90 per cent of our applications are completed within the legislative time frames. That performance benchmarks very well—I am currently in the middle of a benchmarking exercise with overseas agencies.

**Mr ADAMS**—The audit people have done you, have they?

**Dr Smith**—The ANAO will look at those sorts of aspects. Of course, it is up to the ANAO to decide what they will look at, but I would imagine they would look at time frame performance.

In terms of rabbit calicivirus, we have had the injectable form of the rabbit calicivirus poison registered for some years. We are talking about applying the rabbit calicivirus in bait form. It is a very complex exercise. As you might imagine, rabbit calicivirus is of high-level public interest and we have had a lot of information provided to the registration. One of the things we think is very important in the registration of rabbit calicivirus baits is that, to ensure they are going to be effective and to ensure that any OH&S issues are addressed, they are applied only by suitably trained, competent people. The process by which we achieve that is to have them declared restricted chemical products, as 1080 is, for example. The key issue at the moment that is being resolved, which is causing some of the delays that Tony Peacock would have referred to, I am sure, is that the process by which people are authorised in the states is a state matter. We have to liaise with the states in relation to the authorisation and we are currently in the process of doing that.

**CHAIR**—Are you saying that the states are one of the reasons why there has been a time frame of five years to approve a calicivirus bait?

**Dr Smith**—I am not saying that is the only reason, but it is a contributing factor, yes.

**CHAIR**—You are saying that is part of the reason. I can understand people's frustration when the baits themselves have taken a significant period of time to put together in the interests of all of the concerns that people might have about harm to other animals and to human beings and then they present the bait, make application to have it registered and it takes another five years. That is just not good enough. Can I suggest you rigorously look at that?

**Mr FORREST**—Does that mean you stop the clock and start again on the statutory requirement process?

**Dr Smith**—No. If data is required from the applicant to demonstrate that the product is safe or effective and they have not provided that, yes, the clock is stopped. Sometimes when you make a request for necessary information which has not been provided the applicant can take many months to provide it. As the regulator we cannot be assessing information that we do not have.

**CHAIR**—You said in your lead-up comments—correct me if I am wrong—that the contamination of soil by 1080 and the contamination of plants and water was not an issue. Would you like to elaborate on that? Those are arguments that are used from time to time to justify the phasing out of 1080. That is my first question. Did your organisation have any say at all in the announcement by both the state government of Tasmania and the federal government about the phasing out and the time frame set for 1080 use in Tasmania?

**Dr Smith**—Perhaps I will answer the second question first and Dr Pitt might assist with the first question. The answer to the second question is no, nor would we normally have a say in such matters. Our role is to assess products to determine whether they are safe for use and effective. Determining how they are used or whether they are going to be used in particular jurisdictions is a matter for other people. So the answer is no, and we would not expect to.

I will make a general comment in terms of the degradation and Ian might add to it. My understanding is that the chemistry of fluoroacetate is such that it is not very stable, it degrades fairly readily and it is rapidly degraded by bio-organisms in the soil.

**Dr Pitt**—The important thing is that there is not very much 1080 in a bait and you do not need to apply that many baits to control an animal. A bait may fall into water and 1080 may leach out, but you are talking about very small amounts. When you look at how much water you might have to drink, for example, or an animal might have to drink to suffer harm from 1080, it is just an unrealistic amount. It is obviously a useful issue to raise because people are afraid of contamination. But from a scientific perspective the risk is essentially—

**CHAIR**—So the scientific evidence says that, because of the way it is used and the small quantities that are used, it is not a chemical that people need to be fearful of in terms of poisoning.

**Dr Pitt**—That is correct. The only fear they may have is that a bit of 1080 hangs around in the carcass and that is dangerous for their dogs. But as far as other animals go—it is really just that dogs are exquisitely sensitive, and that is where the problem arises.

**Mr ADAMS**—Can I bring that to birds. Birds would not be that much endangered then, other than if they fed off a carcass.

**Dr Pitt**—I do not think birds are at much risk even from feeding from a carcass because they are more tolerant than mammals. They may be at risk from picking up a bait, but only certain baits—the stronger ones.

**Mr ADAMS**—Most state regimes now have pick-up carcass—the carcasses need to be picked up after they have been knocked down anyway.

**Dr Pitt**—And I agree that is a good idea because, if you leave carcasses lying around, you attract feral animals and it looks bad in terms of the public perception. But the risk is actually quite low. There have been theories for secondary poisoning from carcasses for some time, but they have been based on an old analytical method which exaggerated the residues that are there. So there has been a bit of scientific misunderstanding but that has been clarified in recent years.

**Mr ADAMS**—What do you know about other parts of the world using poisons to keep wild native animals in check, similar to what we do?

**Dr Pitt**—We control a number of native animals in Australia. We control dingoes, for example, on the mainland with 1080, we use it to control native rodents in hoop pine plantations in Queensland and we use other poisons against native rodents. But it is the use in Tasmania for wallabies and possums that is very conspicuous.



**Mr ADAMS**—I am well aware of that.

**Dr Pitt**—I am not aware of any similar examples.

**Mr ADAMS**—I am interested in other parts of the world, if you know.

**Dr Pitt**—I am not aware of any, but I am not an expert. I do know that in the US, for example, they still use 1080 to control coyotes, which are a native species, but it is a much more targeted form of application.

**Mr ADAMS**—What about rabbits and things like that in the States?

**Dr Pitt**—I do not know that they have a problem with rabbits as much there; I think they probably have more predators.

**Mr ADAMS**—What about South America?

**Dr Pitt**—I have to plead ignorance on that. New Zealand is the obvious example; they use a lot there, but not for their natives.

**Mr ADAMS**—Yes, I have been there. They use 2,000 kilos a year in New Zealand.

**Dr Smith**—New Zealand has the highest use of it.

**Mr ADAMS**—They are tightening up their use in relation to carcasses. I think they have had a couple of bad experiences with dogs and things like that getting poisoned.

**Dr Pitt**—Yes, understandably.

**Dr Smith**—I can add a little from the review. Ian has mentioned the use of 1080 in the USA, but it is also used in Mexico and Israel. But the bulk of world usage, as you have said, occurs in New Zealand and, to a lesser extent, in Australia.

**CHAIR**—Do you have any figures there about the amount used in Australia? I think our figures show five to 10 kilos across Australia.

**Mr ADAMS**—I think we have them in our papers here.

**Dr Smith**—They are certainly in the review. Those figures, certainly in Tasmania, have been diminishing since the figures we have in here.

**Mr ADAMS**—We talk about 10 kilos or less a year, and it will be a lot less if we take out the forestry department for the future. I think you answered the non-target species. The main argument in Tasmania is that, if you knock down wallabies and possums, you are also knocking down the occasional bandicoot. But your evidence to us is that it does not—that, although it affects an individual animal non-target species, it does not affect the overall pattern of that species generally.

**Dr Pitt**—This is based on the survey data generated in Tasmania. They show that populations of target species and many non-target species that they look at are stable. They are not that accurate, maybe plus or minus 20 per cent, but they are good enough to show across the state.

**Mr ADAMS**—In the sense of looking at poisons, if you are going to use that as a way of knocking down native animals or wild animals, where does 1080 come in the cycle of other poisons?

**Dr Pitt**—I would not like to rank them one against another. You heard from Tony Peacock three weeks ago. His belief is that 1080 is an excellent poison. As a regulator, I should not be quite so effusive because I may not sound objective, but I have no disagreement with what he says.

**Mr MICHAEL FERGUSON**—Could you indicate approximately when you expect that your report on 1080 will be completed and made public?

**Dr Smith**—The preliminary findings report was made public last week, so it and the detailed evaluation are on our web site. So it is out there for a period of three months for public comment. At the end of August, people have to give us their comments. I guess it all depends on whether there is new scientific information that comes in, but we would anticipate finalising it certainly by the end of this year.

**Mr GAVAN O'CONNOR**—This issue of resourcing is a perennial one, I suppose. What are your staffing levels and what sorts of skills do you employ? How difficult is it for you to acquire and retain those skills?

**Dr Smith**—Our staffing level at the moment—a combination of full time and part time, ongoing and non ongoing—is about 130 people within the organisation. It is not particularly difficult for us to acquire the right sorts of skills but we rely very much on expert advice—for example, from people like Dr Pitt in the Department of the Environment and Heritage for environmental matters. We acquire that advice on a fee-for-service basis.

**Mr GAVAN O'CONNOR**—So your task is to assess all chemicals used in agriculture or for agricultural purposes?

**Dr Smith**—Yes.

**Mr GAVAN O'CONNOR**—For production purposes as well as for control of pest animals and that sort of thing?

**Dr Smith**—Yes. The ag vet code, the legislation that we operate under, defines an agricultural chemical product and a veterinary chemical product, so basically it is anything that fits that definition. It is pretty broad ranging sometimes. It actually picks up things like swimming pool products, and one would wonder how sometimes but it does.

**Mr GAVAN O'CONNOR**—Could you explain to the committee how you are resourced.

**Dr Smith**—We are essentially totally cost recovered from the industry that we regulate. This, as I understand it, is a fairly normal model these days with government regulatory agencies. Perhaps I should talk in terms of the new cost recovery framework which is coming into place from 1 July, which is a significant modification on the old cost recovery framework, which has been reviewed by the Productivity Commission. Our revenue comes from two primary sources and a number of minor sources. We receive application fees for applications to register agricultural or veterinary chemical products. The framework that has been set is that they should be 40 per cent of the actual cost of doing the evaluation—this is a Productivity Commission led finding. Then we receive revenue on the basis of a levy on sales of chemical products. That levy in the new cost recovery framework is a tiered levy structure which starts at 0.9 per cent and reduces to 0.55 per cent and then to 0.4 per cent, depending on the level of chemical sales.

**Mr GAVAN O’CONNOR**—So the drought would have knocked you around?

**Dr Smith**—It had a significant impact.

**Mr GAVAN O’CONNOR**—How did you cope?

**Dr Smith**—During that period the APVMA, or the NRA, as its predecessor was known, has not increased its fees at all—not since 1996 or 1997, before my time there. During that period the APVMA built up a reserve to deal with circumstances such as droughts when there was not adequate revenue available to fund the regulatory activities of the organisation. The shortfall between revenue and cost was essentially made up by the reserve plus other efficiencies in the way we were operating.

**Mr GAVAN O’CONNOR**—In the particular area that we are dealing with, smaller companies have developed innovative products that they are seeking to have applied and used. How does your fee structure affect the possibility that these smaller companies can bring their products into the marketplace? Do you have an inhibitive fee structure? Have you found that? Are people whingeing about it?

**Dr Smith**—People have made that comment. But I guess I would say that the range of fees that we charge—and I will go again from 1 July because that is where we will be—ranges from nothing for a simple administrative change to a label of an existing product through to about \$49,000 for a major application for a major category 1 new chemical, new product. That can be compared, just as an example, with the same type of application to the United States EPA, who are a much bigger organisation with a much bigger market et cetera, but they essentially assess the same data as we do. Their time frame for that is between 24 and 32 months and their fee is \$US475,000. So, while I can understand concerns about the costs of registration, I think we compare fairly well internationally. In that regard, we are trying to link up more closely with agencies in other countries.

**Mr GAVAN O’CONNOR**—I was going to ask you about that.

**Dr Smith**—For example, I recently signed memoranda of understanding with the Canadian Pest Management Regulatory Agency and the Canadian Veterinary Drugs Directorate with a view to cooperating more and sharing technical expertise so that we can both introduce quality and efficiency improvements.

**Mr LINDSAY**—Just to extend on what Mr O'Connor has asked you, are you aware of any manufacturer, discoverer or organisation that has looked at bringing a chemical onto the market but has then looked at your process or your costs and just said that this is too hard, too long or too costly? Are you aware of anybody who has done that?

**Dr Smith**—Not specifically, no. I have heard of people who have made general comments that it is too hard and that the barrier is too high or whatever.

**Mr LINDSAY**—Do you then get complaints from perhaps a person who wants to produce a product that is for only a limited or small market—

**Dr Smith**—Yes.

**Mr LINDSAY**—who is dealt with in exactly the same way under your system as a person who has a very wide distribution of whatever chemical he wants to register; and does that cause an impediment?

**Dr Smith**—It can be an issue. We have a number of ways of trying to address those sorts of concerns. One is that we have a provision for a minor use permit, for example, where people want to treat a particular disease or a pest for which there is no adequately registered product. So we have an ability to issue a minor use permit. We still have to be satisfied in terms of those risks to health and safety and the environment. But because these permits quite often relate to an application which is limited in geography or time or whatever, you can perhaps be satisfied in relation to those risks without having to have as much detailed data. So we try to do that.

In relation to lower risk products, there were some changes to our legislation in October 2003 which introduced a provision for listed registration or reservation for lower regulatory requirement products. We are currently going through a process in consultation with the industry associations at the moment for developing some standards for some of those sorts of products which may then be suitable for listed registration, which would be a more streamlined way of addressing that concern.

**CHAIR**—I will just go back to the issue of 1080, for obvious reasons. Based on scientific studies and the significant exercise undertaken by the NRA, can you comment on the risk of 1080? We hear a lot of emotive reactions to the use of 1080 and we do not hear much about the scientific reality of the use of 1080. Your evidence today has indicated that, because of the quantity used and the way it is managed by the people using it and the controls that you and other agencies have on it, it is not an issue that affects health, safety and the environment. Would I be correct in saying that?

**Dr Smith**—That is right. We believe that, based on the scientific assessment, if it is used according to the requirements we have outlined in the preliminary review findings report, is within the framework we already have—and I have mentioned the restricted chemical product that already exists within that framework—and is part of well-planned baiting programs that are in place, we can be satisfied that the risks to health, safety, the environment, off-target damage et cetera are being adequately managed.

**CHAIR**—So we could safely say that that could be reinforced by the significant number of submissions—250 in total—that came to the NRA when they did their investigation. The evidence contained in those submissions would indicate, firstly, that the 1080 poison—and please do not think I am putting words into your mouth; I am not—is a suitable poison for the control methods it was designed for and, secondly, that it has no impact on public health and safety or the environment. Would you like to make a comment about what other suitable chemical is available in the world today that would take the place of 1080 and do the job as effectively with the low risk that 1080 has in all those areas? It is a longwinded question but a very important one.

**Dr Smith**—I will make a general comment and then Ian might comment.

**Dr Pitt**—I will make some qualifications.

**Dr Smith**—Yes. We try never to use the word ‘no’ but, basically, it is based on the scientific evaluation of the scientific data that was submitted to us. As I said, there were 260 submissions by people making comments, but there were about 150 scientific studies which were assessed and they were what we gave weight to when we made our regulatory decisions. We are mindful of the information that comes in the submissions, but our regulatory decisions have to be based on science and objectivity, so they are not usually part of the criteria.

**CHAIR**—But you have based that assumption on 150 scientific submissions?

**Dr Smith**—Yes. Some of those were very extensive and some were not so extensive. Perhaps Ian might be able to comment on that. In terms of what other chemicals there might be which would do a better job than 1080, I know there is research going on into a number of alternatives. My conclusion, after looking at the review and the review report, is that it is very effective at doing the job it is designed to do.

**CHAIR**—In closing, for the record and for the benefit of those who may read this evidence, could you openly describe what NRA stands for?

**Dr Smith**—It has nothing to do with Charlton Heston! We have changed our name. It used to be the National Registration Authority for Agricultural and Veterinary Chemicals, but we are now called the Australian Pesticides and Veterinary Medicines Authority.

**CHAIR**—I just wanted to make that point because people might get confused about the relationship of NRA with APVMA.

**Dr Smith**—Surprisingly enough, in the past we did get a few emails misdirected from Charlton Heston.

**Dr Pitt**—I would like to add a couple of brief qualifications, if I may. In general, 1080 has intrinsic selectivity and if it is used carefully and appropriately the non-target impact is very low. But sometimes in the public perception one dead animal can be too many. That is the general picture but there are still some areas of uncertainty. One is the issue of the spotted tailed quoll and dog baits. It does not look likely that dog baits are having a major impact but they probably

have a contributing impact. I think you heard from Tony Peacock last week that there are other toxins being looked at which would improve the safety profile.

The other issue is the baiting of pigs in North Queensland with 1080 in meat. It is very hard to tell what happens when you drop bait with a lot of 1080 out of an aeroplane. You do not really know what happens to it. But I have spoken to people who describe birds following the bait layer along from the ground and picking up the baits. What happens to the birds is anybody's guess, but it is unlikely to be a good outcome. You would have also heard from Tony Peacock last week that there are approaches to getting around this problem. It involves 1080 but it includes making the bait medium more specific. So there are still some areas of uncertainty, but they are being addressed. In general, the non-target impact is very low. Personally, I came to this review fairly ignorant and suspicious, but looking at all the information, which is an impressive volume of work—in Australia especially—it is hard to think of another poison which would do a better job.

**CHAIR**—Thank you very much. We appreciate your evidence.

Resolved (on motion by **Mr Adams**):

That this committee authorises publication of the transcript of the evidence given before it at public hearing this day.

**Committee adjourned at 6.29 pm**