14 May 2004

SUBMISSION
of

ANIMALS AUSTRALIA

to the
House of Representatives Standing Committee on Agriculture, Fisheries and Forestry
inquiry into

The Impact of Pest Animals on Agriculture

Introduction:

Animals Australia welcomes the opportunity to provide input to this inquiry. Animals Australia is a peak organisation, advocating the 'animal view' for some 47 animal welfare organisations.

*Please note that **Animals Australia** is the Australian arm of the **Australian and New Zealand Federation of Animal Societies Inc.** and the names are often used interchangeably. Older enclosed documents refer to the federation only as ANZFAS.*

So-called 'feral' or 'pest' animals are no different in their ability to feel pain and to suffer than any other similar animal, though Animals Australia recognises that, through no fault of their own, these animals often come into conflict with alternate human desires for land use. It is for this reason, and because of the negative connotations associated with the label 'feral' or 'pest', we prefer these animals be referred to as '**mislocated**'.

Our primary concerns are that populations of mislocated animals are often 'reduced';

1. with little regard to independent assessment (ethical, ecological, biological, economic) of the justification for such actions,
2. using inhumane and/or ineffective methods, and
3. without adequate follow-up to assess whether the lethal or other control is even effective.

This submission and its enclosures are provided to both explain why we are concerned about the often inhumane and unjustified treatment of mislocated animals, and to provide input on our concerns relevant to the specific and major 'pest control' methods and campaigns.

Representatives of Animals Australia would willingly make themselves available to address the Committee at a hearing if required.

Enclosures:

1) The **Animals Australia** policy expands upon these concerns. An extract of the **Policy Compendium** is attached to this submission.

2) Also enclosed is a paper written jointly by Frankie Seymour (Animals Australia/ANZFAS Introduced Wild Animal Division Representative) and Glenys Oogjes (Animals Australia/ANZFAS Executive Director) for the Australasian Vertebrate Pest Conference in Melbourne in May 2001. The paper, titled **'The Risky Politics of Scape-Goating the Victim'**, discusses growing concerns among welfare organisations and the general public about: the cruelty of most traditional and current methods of 'managing' competitor animals; the scientific legitimacy and ecological soundness of attempting to remove the competitor animals from the post-European Australian environment; and the motives of governments in doing so.

3) A speech by Glenys Oogjes to the **Fertility Control for Wildlife Management** 4th International Conference, Great Keppel Island, in 1996 [and subsequently published in the Journal of Reproduction, Fertility and Development, Vol. 9(1) 1997] is attached and provides a discussion of the way mislocated animals are currently treated in Australia, and questions whether lethal control is always the best control. Despite being delivered some years ago, and proposing the introduction of '**Animal Impact Statements'**, little has changed.

4) A paper delivered by Glenys Oogjes to a workshop on 'Humaneness and vertebrate pest control' held at the Keith Turnbull Research Institute - Vertebrate Pest Research Unit in Victoria in 1996, and entititled *'The ANZFAS View of Vertebrate Pest Control Using Chloropicrin and 1080 Poisoning'* is also provided for more specific views and information on those topics.

5) The Animals Australia submission to the NRA Review of 1080 Poison, August 2002 (Note: that review is still underway - of course now by the authority called Australian Pesticides and Veterinary Medicines Authority)

6) The Communiqué from the RSPCA Australia/AWC/VPC joint workshop – Development of a national strategy towards humane vertebrate pest control', held 4-5 August 2003.

The Inquiry's Terms of Reference.

It is regrettable that there appears no intention in the terms of reference for this Inquiry to address the animal welfare aspects of population manipulation techniques. Our submission will, regardless of this deficiency, address aspects relating to the justification for population control, the ethics of control methods in use, the need for the development and adoption of more humane methods, and the obvious need for a 'national strategy' for humane introduced animal control*.

In regard to the matters the Committee has indicated it will address, Animals Australia's submission will primarily relate to 'approaches to pest animal issues…' including 'eradication of infestations...' and 'reduction of impact of established pest animal populations'.

Finally, in relation to the second last term of reference, 'The scope for industry groups and R & D Corporations to improve their response to landholder concerns about pest animals', I would urge you the Committee to further consider how R & D organisations could increase their emphasis on the development and adoption of more humane methods of control.

* A 2-day workshop was convened by RSPCA Australia, the Animal Welfare Science Centre and the Vertebrate Pest Committee and held in Melbourne in August 2003 and was attended by State, Territory and Federal Government agencies industry groups, farmers, researchers and the peak animal welfare groups, including Animals Australia. All agreed that 'a national approach to humane vertebrate pest control' was required. An extensive discussion paper is soon to be released. I attach the 'Communiqué' for your information.

The Impact of Pest Animals

Our History

There is no current research which suggests that the presence of European animals in pristine native Australian mainland ecosystems has any significant impact. Even when (occasionally) a native species is affected, the impact tends to be highly localised and easily absorbed. Usually, European animals simply cannot survive in such alien ecosystems. Where they do survive, it is because there is a niche into which they can fit with minimal disruption to the existing ecosystem.

Without exception, whenever research suggests that wild introduced animals have been 'implicated' in some environmental problem in mainland Australia, the 'problem' has occurred in a landscape where the habitat has been destroyed or changed by some other human activity (see Environment Australia's *Threat Abatement Plans* for foxes and feral rabbits, cats and goats), including particularly agricultural pursuits.

When European humans began to settle Australia, they were 'hell-bent' on remaking the Australian landscape in the image of Europe. They destroyed the native vegetation wherever they could reach it, and created a liveable environment for themselves and their European animals. Had this not occurred, it is unlikely that many of the introduced animals who have been abandoned in Australia would have survived to build wild populations.

The destruction of the dense coastal vegetation, making way for sheep and cattle pasture, made an ideal habitat for rabbits where rabbits would not otherwise have prospered. The provision of artificial water sources for sheep and cattle in the arid zone also made a survivable habitat for rabbits where they could not otherwise have survived at all. The provision of a plentiful supply of rabbits made an ideal habitat for foxes, who were introduced to satisfy the hunting urge of a few upper class 'hunters', and for cats who were (a) already established throughout northern and western Australia when Europeans first arrived (*Wagner 1995*) (b) brought in as pets and abandoned by irresponsible 'owners' and (c) deliberately released all over the outback to control the rabbits (*Partridge 1994*).

Additionally, many of the introduced domesticated animals themselves (sheep, cattle, goats, pigs and horses) were abandoned and managed to survive in the pseudo-European environment, sometimes competing successfully with native animals whose ideal habitat no longer existed, and sometimes exacerbating elements of the change in the environment which European humans had begun by destroying the native flora and fauna.

In no case is there evidence that an abandoned introduced animal or its descendants have actually been a primary cause of damage to the environment.

National Parks (3rd Term of Reference)

Inasmuch as national parks are intended to provide a kind of living museum of native flora and fauna, there may be an argument for removing non-native animals from national parks, provided this can be done without the use of painful, stressful or lethal measures. However, this argument applies only if all other change agents of European origin are also removed from the national park, and if every effort is made to restore the area to its original condition. Otherwise any attempt to remove non-native animals from the park will not only be ineffective but will be actively counterproductive to the ongoing evolution of the flora and fauna of the park.

Privately and publicly owned land which is not being kept as a museum of native flora and fauna should be permitted to continue its evolution towards a natural balance incorporating both native

and non-native plants and animals. In the absence of any will to restore these areas to their original condition, natural selection should be allowed to take its course. Attempting to hold back the tide of evolutionary process can only ensure that far more native and non-native animals suffer than would suffer if nature was permitted to do what nature does best. Species which cannot survive in the altered environment should be permitted to achieve the peace of extinction. Species which are here to stay because we have made this place such an ideal habitat for them must be permitted to settle into their new niches and stabilise their populations with a minimum of human interference.

The adequacy/effectiveness of current practices and resources for introduced animal control

Current practices and resources dedicated to the control of abandoned introduced animals and their descendants are not merely ineffective; because, in most cases, they involve reduction of a population without any attempt to achieve eradication of the population, and without any attempt to restore the environment to its original condition, all they are capable of doing is removing individuals from an established set of niches. Consequently, those niches are taken over by other individuals of the same species who would otherwise not have survived because there were no niches available for them.

Additionally, because current practices generally involve lethal control, they select forever increasingly control-resistant strains of introduced wild animals.

These lethal (and therefore, by definition, ineffective) control methods include 1080 (sodium monofluoroacetate) and other poisons such as Warfarin, fumigants such as Chloropicrin (tear gas), traps which hold an animal until it can be killed or dies of thirst or starvation, shooting in all its forms, and biological (germ) warfare such as Myxomatosis and Rabbit Calicivirus Disease (RCD).

The latter two are particularly ineffective. **Myxomatosis** is now endemic and attenuated in the Australian rabbit population. Severe outbreaks of the disease still occur spontaneously from time to time, but a general level of immunity has developed in the population, partly as a result of natural selection for naturally immune rabbits and partly as a result of exposure to mild, attenuated versions of the disease which impart immunity to the more severe strains. Australian rabbit populations, like those of other fast-breeding animals, quickly recover from decimation by disease and other methods of mass slaughter, rapidly breeding back to levels which are consistent with the availability of feed and habitat.

RCD has been no more successful in permanently reducing the rabbit population than myxomatosis before it. The natural cycle repeats itself. Dead rabbits leave empty rabbit niches. New rabbits fill those niches and remain there until humans find some new way of wiping them out. They are then, once again replaced by new rabbits.

Improvements of current practices, and alternative solutions for introduced animal control.

European animals have done well in Australia because the natural environment has been modified into one ideally suited to them. In the coastal areas, the dense natural vegetation has been replaced by open pasture and woodlands. In the arid areas, introduced wild animals have been provided with access to artificial water supplies.

Rabbits and larger introduced herbivores such as goats as well as some native herbivores such as kangaroos have all done very well out of the artificial pastures and water supplies. Rabbits, in turn, provide at least 70-90% of the diet of foxes and wild cats (*Coman and Brunner 1972, Bayly 1975, Bayly 1978, Jones and Coman 1980, Catling 1988, Newsome and Coman 1989, Johnson 1991, Newsome 1991, Seabrook 1991, Jones, 1992).* Not surprisingly, old growth forest and other pristine habitat has proven highly resistant to incursion by cats and foxes, largely because of the absence of rabbits *(Cameron 1992).*

Given that where the natural Australian environment remains intact, introduced wild animals are either unable to survive or, where they do find a niche, they appear to have minimal impact on the ecosystem, the obvious way to be rid of wild populations of introduced animals is to gradually restore as much as possible of the landscape to native habitat. Impacts of removing non-native animals on native animals (for examples many native raptors depend on rabbits for up to 90% of their diet), would need to be carefully considered in the course of this restoration. Following the humane removal of an existing population of animals, gradual removal of the outback water supply would prevent virtually all species of introduced wild animals from repopulating the arid zone. Again, the impact on native animals of removing artificial water sources would have to be considered. These populations might also need to be humanely and non-lethally reduced before the excess water is removed.

<u>Accepting the presence of introduced wild animals in altered ecosystems?</u>
Restoration of the natural environment is obviously not a viable option in urban areas and where European agricultural practices are to continue. In these altered ecosystems, natural selection and evolutionary process should be permitted to take their course. Introduced wild animal populations should be permitted to stabilise in balance with introduced plants and whatever remains of the native flora and fauna, consistent with the availability of food and habitat.

Where it is considered necessary to remove any animal, native or non-native, from an environment, fertility control is the only method of doing so that is likely to be either humane or effective. It is humane because it prevents unwanted animals from coming into existence, rather than by killing, hurting or traumatising existing animals. It is effective because, over time, it enables an unwanted population to be eradicated, rather than merely reduced. This is because healthy sterile individuals can hold the niches against fertile individuals, buying time for the control program to reach all the other individuals in the population.

It should be noted that fertility control measures are not without their own animal welfare concerns, but generally speaking, they are unlikely to be worse than the current practices.

Immunocontraception: the principal concern with this method of control is that it may involve releasing modified live pathogens into the environment. Some virologists believe that, even with pathogens which research has, to date, shown to be totally species specific, viruses are volatile and may alter

once released. This is of course no greater a risk that the past and continuing releases of various diseases (biological control such as Myxo).

Chemical fertility control: If suitable chemical agents were developed, fertility suppressants rather than lethal toxins could be delivered using food baits. Cytotoxins are considered to have potential if they can be successfully targeted to specific cells yet safe for other body tissues. Fertility suppressant drugs such as steroid hormones, progestins and androgens are being studied as a method of temporary oral fertility suppression.

Surgical fertility control (i.e. capturing and sterilising free-living animals, then returning them to their environment): This has been used very successfully in Australia and elsewhere for free-living cats (*C.A.T.S. 1995*) and for kangaroos (for example, the successfully sterilisation of kangaroos at Government House in Canberra in 1992). Because it involves the deliberate selection of individuals for sterilisation and can be accompanied by other veterinary procedures such as vaccination, treatment for illness and parasite control, it can be used not only to completely eliminate a population over time, if that is the objective, but, alternatively, to maintain a population at a desired level. It is an ideal form of control for relatively small and isolated populations, particularly of larger animals.

Harbour destruction

Ripping out empty warrens and burrows of rabbits and other burrow dwelling animals can delay re-establishment of a population after a decline. However, if feed, water and suitable habitat remain available, a new population of the introduced wild animal will eventually dig new burrows and warrens. This is a temporary measure, but it is certainly more effective and humane than lethal control.

Natural and unnatural barriers

Australia was so long protected from invasion by the new species of animal that were evolving elsewhere on the planet because it was an island protected by a vast ocean. Similarly, on a smaller scale, artificial barriers such as fencing can provide protection for vulnerable species, or in the case of agriculture valuable crops, from the impacts of introduced predators and competitors.

Providing such areas has proven a successful technique for assisting vulnerable species to build up their numbers. However, the areas protected by such fencing are, in a sense, merely zoos. They protect the vulnerable population not only from predation, competition or degradation by introduced wild animals, but also from other anthropocentric impacts, and from native predators and competitors. Eventually, in the absence of its natural predators and competitors, the vulnerable species will overpopulate the protected environment and a far greater number of individuals will suffer, as nature reduces the population by starvation and disease, than would otherwise have suffered. Enclosed populations would require ongoing management.

Animal welfare aspects of attempts to decrease the impact of 'pest animals'

It is regrettable that the issue of 'animal welfare' was not provided with a discrete 'Term of Reference', nor even mentioned in regard to this inquiry, particularly given the massive suffering caused to mislocated animals. **Animals Australia** sees animal welfare as the most important issue relating to the control of introduced animals to be dealt with by this Inquiry. There is widespread and often extreme cruelty inflicted on individual animals by current practices used for the 'control' of introduced animals and their descendants and across Australia.

The cruel methods are outlined here:

Poisons: 1080 poison (sodium monofluoroacetate) is used in baits for most introduced wild animals. This poison is recorded as causing a range of symptoms including: anxiety, salivation, nausea, vomiting, incontinence, twitching, auditory hallucinations, organ congestion, renal tube degeneration, respiratory problems, spinal pressure, citrate accumulation in the tissues, convulsions, coma , and, of course, death. Animals poisoned with 1080 may take several hours to die (*Animals Australia Introduced Wild Animals Fact Sheet 2000).* **See also** the enclosed speech which expands upon the issue, and also the AA submission to the NRA review of 1080 poison in 2002 (that review is still underway – now by APVMA).

Warfarin is routinely used to kill wild pigs. This poison causes a reduction in food intake, followed by lameness and lethargy (*Animals Australia Introduced Wild Animals Fact Sheet 2000).*

Fumigants are often used to kill animals which use dens, in particular rabbits and foxes. Burrow entrances are sealed and the fumigant pumped or diffused throughout the burrow. Native wildlife such as goannas, other reptiles and small mammals which used burrows for shelter are also at risk from fumigation. Chloropicrin (tear gas) is an extremely painful fumigant used for rabbits. It is a strong sensory irritant which causes profuse watering of the eyes and nasal passage and intense irritation of the respiratory tract. Death is by respiratory failure. Other toxins frequently used are carbon monoxide, carbon dioxide, calcium cyanide and phosphine (*Animals Australia Introduced Wild Animals Fact Sheet 2000).*

Trapping: Steel jaw traps are still legal in many areas, and other traps such as the 'soft' jawed or laminated traps and (treadle) snares still seize and hold the animal's leg or work like a noose, tightening as the animal struggles causing great stress and panic to the animal. Ultimately any trap is inhumane, causing the animal terror while it is trapped and, if not regularly checked, allowing the animal to starve, die of thirst, or be attacked by predators (*Animals Australia Introduced Wild Animals Fact Sheet 2000).*

Shooting: Very few people engaged to shoot introduced wild animals are sufficiently expert marksmen to be able to kill every animal they target without either fatally or non-fatally wounding some of their victims. The routine mass shootings of native competitor animals (eg ducks and kangaroos), which have received considerable exposure over recent years, demonstrate the scale of suffering that can occur through panic and high wounding rates when animals are subjected to mass shooting. The recent aerial shooting of brumbies in Guy Fawkes National Park (NSW) and wild goats on Lord Howe Island caused the suffering of countless individual animals who were wounded and left to die. This suffering was entirely predictable since aerial shooting involves even expert marksmen attempting to hit a moving target from a moving platform. The chances of achieving a 100% instant

kill rate from a helicopter or a truck are negligible (*Animals Australia Introduced Wild Animals Fact Sheet 2000).*

Mustering: Instant death of all animals shot may be accomplished in the case of ex-farm animals such as horses and goats, if the animals are mustered prior to shooting. However, there are other animal welfare concerns arising from the panic and stress caused by the mustering process, and transportation, yarding etc (*Animals Australia Introduced Wild Animals Fact Sheet 2000).*

Myxomatosis, deliberately released in Australia in the 1950s, causes rabbits to die a slow and painful death over a period of weeks. The flu-like symptoms may cause blindness, painful lesions and a lingering death that may can take up to three weeks (*Animals Australia Introduced Wild Animals Fact Sheet 2000).* New, more virulent strains are now systematically released by animal managers.

Rabbit Haemorrhagic Virus Disease (renamed in Australia to Rabbit Calicivirus Disease or RCD), deliberately released in 1996, was known (from overseas research) to be excruciatingly painful causing rabbits to scream and cry through their last minutes of life. The disease kills more quickly than myxomatosis – infection leads to acute clinical disease in 1-3 days and rabbits die 6-12 hours after the onset of the disease. Symptoms include convulsions, ataxia, posterior analysis, pendalage and an increased body temperature and respiratory rate (*Cancelloti,, Colin and Prigent 1989*). No adequate animal welfare research was undertaken (nor intended to be undertaken) prior to the accidental then deliberate further release of RCD in Australia.

In New Zealand where RCD was introduced illegally, a new disease which rots away rabbits' ears, killing them over several months has appeared. Scientific research suggests the new disease is associated with RCD. The extensive use in New Zealand of the live virus on food baits may be associated with the appearance of the new disease *(Clark, Sanson, Donaldson, Motha and Knowles, 1999).*

As well as being inhumane for its target rabbits, RCD has the potential for causing horrific suffering to incalculable numbers of other animals, including humans. When it appeared in China less than two decades ago, there is overwhelming evidence that it had jumped from some other species to the rabbit (as other Caliciviruses are capable of doing). Many international Calicivirus experts are convinced the disease is not species specific, and will jump species again (*Smith 1996, Smith 1998, Matson 1999*).

Conclusion

No civilised society would deliberately inflict this array of appalling suffering on its animals. Where it is considered necessary to remove any animal, native or non-native, from an environment, this should be done by humane and non-lethal measures.

If lethal methods are to be used (after sufficient justification) they must not cause pain or stress. Headshooting, as long as it does by experts and does not involve stress or panic, and poisons or fumigants which cause no pain and render the animal unconscious prior to killing it, are the only lethal options which appear to meet this criterion. However, no method of control which robs a healthy animal of its life can be considered humane, and all such measures should always be avoided.

Additionally, as mentioned above, lethal measures to control introduced wild animals should be abandoned in any case because they are invariably ineffective unless eradication can be achieved, and reintroduction prevented. They may even be actively counter-productive and cause unnecessary suffering to native animals, where they delay the stabilisation of altered ecosystems.

Finally, we again draw your attention to

1) the enclosures which provide more comprehensive arguments to support the statements in this submission,
2) the importance of the current demonstrated support for a 'national strategy towards humane vertebrate pest control' (see attached communiqué), and
3) the availability of Animals Australia representatives to provide oral testimony at a hearing of the Committee, or to respond to any request for clarification of this submission.

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ADDITIONAL INFORMATION HELD BY THE COMMITTEE

ATTACHMENT TO SUBMISSION NO. 32

ATTACHMENTS, APPENDICES AND PHOTOGRAPHS PROVIDED WITH SUBMISSIONS ARE HELD IN THE COMMITTEE OFFICE