

Australian Pest Animal Strategy 2017-2027

Submission from the Australian Veterinary Association Ltd



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The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our 8500 members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, farm animals, such as cattle and sheep, and wildlife. Government veterinarians work with our animal health, public health and quarantine systems while other members work in industry and commercial enterprises. We have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the Association.

Summary

The document, "Australian Pest Animal Strategy 2017-2027" is a high-level overview of the Australian Government's 10 year plan for pest animal management. However, the AVA has concerns about the lack of detail included in the strategy and whether it will achieve its objectives for the following reasons:

- The document is too long to be a simple summary, but too short to be a comprehensive strategy; it gives little detail of the key problems, their relative economic and environmental importance, and resources available to achieve the strategy's objectives;
- The document contains general statements of sharing responsibilities however is unclear as to how this will play out;
- Other than brief mentions of the relevant animal welfare Codes of Practice, there is a lack of emphasis and detail around the animal welfare principles of humane pest animal management, and how best practice will be achieved for this important aspect of the strategy.

Australia's pest animal problems have existed for more than 150 years. More emphasis needs to be placed on the history of success and failure in addressing these problems so that we continually build on our accumulated knowledge. It is only in this way we will avoid repeating failures of the past and wasting resources in areas which are unlikely to be successful.

Since 2003 a great deal of work was done on the development of [Vertebrate Pest Codes](#) for each species, as well as a [Model for assessing the relative humaneness of pest animal control methods](#)¹. This to ensure that, where pest animal control is undertaken, the most humane method available is used. The strategy needs to more clearly detail how implementation of best practice will be achieved, and also how research into more humane methods will be supported going forward.

Recommendations

1. The document needs to provide greater detail of current issues, their economic and environmental cost, resources available, monitoring of progress and any deficiencies in its implementation. This would allow determination of future resource requirements based on considerations of what has/has not worked, and why, as well as appropriate allocation of resources.
2. The document should devote a section to addressing the animal welfare implications of pest animal management: how the relevant *Vertebrate Pest Codes* and *Relative Humaneness Assessment Tool* will be used in management decisions; how to achieve national adoption of these codes; how to drive research into continuous improvement in available methods; and how best practice will be implemented going forward.

Specific Comments

p5. *"The strategy defines a pest animal as those animals that cause more damage than benefits to human valued resources and social wellbeing".*

Comment: The strategy has a predominant human-centric view and provides insufficient 'value' to protection of environmental assets.

p6. *"The cost of pest animal management should be borne by those who create the risk and those who benefit from its management. Governments may co-invest where there is a net public benefit from any such intervention"*

Comment: The concept of shared responsibility may shift responsibility away from Government to the detriment of the strategy's goals. As incursions spread responsibility is shifted to State Governments and other stakeholders. Yet pre-border and border control are largely the direct responsibility of the Commonwealth Government.

p6. Environment - The impact of feral pests on native wildlife is not mentioned.

p7. *"Activity is undertaken and investment is allocated according to a cost-effective, science-based and risk-management approach, prioritising the allocation of resources to the areas of greatest return"*

Comment: Allocating resources to areas of greatest return is flawed because the costs of incursions are often not recognised until many years later. Because of this, a high priority must be allocated to new and nascent incursions.

p8. *"Risk creators and beneficiaries contribute to the cost of risk management measures in proportion to the risks created and/or benefits gained subject to the efficiency of doing so."*

Comment: Poor systems or failures of biosecurity at the border are one such risk creator. The document could more clearly indicate the structure for cost-sharing between governments, industry, and individuals.

p8. *"This policy approach recognises the need to maximise the return on investment in pest animal management and consider who predominantly benefits from potential investments."*

Comment: All Australians benefit from biosecurity with lower costs of production, export advantages and improved animal welfare outcomes.

p13. *"Understand the need for multiple species approaches and the cause-and-effect relationships that apply to pest animal problems."*

Comment: this is an excellent approach. Multiple species approaches including habitat modification, reforestation and control of water sources are supported.

p18. Monitoring outcomes objectively - the strategy mentions "FeralScan" however has this program been monitored and proven to be effective?

The strategy would be improved by inclusion of additional detail about acceptable outcomes as determined by a reduction in negative impacts from the pest involved. Monitoring the number of dead animals or those trapped and removed from an area, or number of poison baits remaining, is not sufficient in most environments. Understanding outcomes will require greater discussion around monitoring, measuring and recording parameters that truly indicate effectiveness of the procedures employed.

Pest Animal Control Methods – Animal Welfare Implications

The draft strategy fails to adequately address the very significant issue of humaneness of pest animal control methods. There is a brief mention of the Vertebrate Pest Codes of Practice in a couple of sections of the document, and a mention of the Australian Animal Welfare Strategy which ended in 2013. However a 10 year national strategy of such importance should include a section devoted to addressing the animal welfare principles of humane pest control, including how the relevant Vertebrate Pest Codes and Relative Humaneness Assessment tools will be used in management decisions, how to achieve national adoption of these codes, how to drive continuous improvement in available methods, and how best practice will be implemented going forward.

Even though certain species are considered pests, society still has an ethical obligation to minimise suffering of sentient animals. Consideration of animal suffering should occur regardless of the pest status or the extent of damage created by the pest.

For most people in today's society the management of pest animals is acceptable provided that such management is humane and justified.²

However, many of the methods used to control pest animals in Australia are far from humane. There is a pressing need to improve the humaneness of existing control programs – and ban some unacceptable methods.

In 2003, a joint workshop by the Vertebrate Pest Committee, RSPCA and the Animal Welfare Science Centre requested a **Model for assessing the relative humaneness of pest animal control methods**¹ be developed - this was subsequently developed by Trudy Sharp and Glen Saunders of NSW DPI in 2008.

- Part A examines the **impact** of each method on overall welfare, and the **duration** of this impact, by looking at the impact in each of five 'domains' originally described by Mellor and Reid (1994).³
- Part B examines the **intensity** of suffering caused by the killing technique and the **duration** of suffering based on the time to insensibility criteria described by Broom (1999).⁴

The relative humaneness of different techniques can be compared based on the score obtained. The outcome of this work was the development of Vertebrate Pest Codes by the NSW DPI Vertebrate Pest Research Unit.

These Codes were not fully adopted by the Australian Agricultural Ministers (AGMIN) as hoped, following their development. This strategy should seek to have **nationally harmonised adoption of these Codes**, including phasing out of those methods identified as unacceptable from an animal welfare point of view (eg serrated-jaw leg-hold traps, phosphorus, warfarin, chloropicrin, strychnine), and adherence to principles which require use of the most humane method possible in each situation.

As examples: soft-catch foot-hold traps (padded, laminated or off-set) are significantly more humane than serrated jaw traps or leg-hold traps, and are equally efficacious, so these should be used, and serrated jaw traps banned; where poisons are used, the most humane options should be used, eg Para-aminopropiophenone (PAPP) in place of 1080 where possible.

Animal Welfare Principles for Pest Animal Control:

1. Control must be justified, and aims must be clear. Controllers must understand the ecology of the pest species and the impact created by it (eg it is pointless to eliminate pest cats in an area if this will allow another pest, such as rats, to dominate)
2. Must be effective, achievable - control must only be undertaken if aims can be achieved

3. Choice of method:
 - a. Identify the available alternatives
 - b. Target specificity - use methods appropriate to the pest species to kill as many as possible
 - c. Kill as few non-target species as possible
 - d. Relative humaneness - use the method which causes least suffering
4. There must be follow up assessment – must assess if the method worked, and modify or change if not
5. Steps must be taken to maintain the benefits, otherwise the suffering was not justified.

Research on more humane alternatives

The strategy should also promote ongoing research into development of more humane alternatives for pest animal management. As examples:

- Ideal poisons would be anaesthetics that put the target animal into an irreversible sleep, such as α -chloralose, PAPP, carbon monoxide, nitrogen gas.
- Addition of PAPP to foot-hold traps in place of 1080, and research to determine the best mechanism of delivery (eg ejector mechanisms, or addition to meat baits).
- Ongoing research into fertility control which is seen as potentially the most humane and efficacious way to control populations long-term.

References

1. Sharp, T and Saunders, G (2008). A model for assessing the relative humaneness of pest animal control methods. Australian Government Department of Agriculture, Fisheries and Forestry, Canberra, ACT.
2. Mellor, D. J., and Littin, K. E. (2004). Using science to support ethical decisions promoting humane livestock slaughter and vertebrate pest control. *Animal Welfare* 13, S127-132.
3. Mellor, D. J., and Reid, C. S. W. (1994). Concepts of animal well-being and predicting the impact of procedures on experimental animals. In 'Improving the Well-Being of Animals in the Research Environment. Proceedings of a conference held at the Marriott Hotel, Sydney, October, 1993'. (Eds R. M. Baker, G. Jenkin and D. J. Mellor) pp, 3-18. Australian and New Zealand Council for the Care of Animals in Research and Teaching (ANZCCART): Glen Osmond, South Australia).
4. Broom, D. M. (1999). The welfare of vertebrate pests in relation to their management. In 'Advances in vertebrate pest management'. (Eds. D. P. Cowand, C. J. Feare) pp. 309-329. (Filander Verlag: Fürth.)