



# Authority to Control Wildlife (ATCW) system review

**Submission from the Australian Veterinary  
Association**

**June 2018**



## The AVA

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our 9,500 members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, livestock and wildlife. Government veterinarians work with animal health, public health and quarantine systems while other members work in conservation, welfare, industry for pharmaceutical and other commercial enterprises. We also have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the Association. The AVA has a range of special interest groups (SIGs), allowing members with shared interests or expertise to develop their practice and skills in a specific area. For the purposes of reviewing *The Authority to Control Wildlife (ATCW) system review*, two of the special interest groups – *Conservation and Biology and Animal Welfare and Ethics* – have been consulted for their expertise and knowledge to produce this submission.

## General

The AVA concurs that control of over abundant animals, both native and introduced, may be justified to prevent and address adverse impacts on agriculture or the environment. Methods can involve harvesting, culling, poisoned baits or biological control, or combinations of these, provided they are highly effective and humane. We recommend that use of non-lethal control methods are exhausted before considering lethal controls.

Non-lethal options should include guardian dogs for kangaroo control, managing vegetation type and appropriate selection of agricultural activities in those areas that pests and wildlife frequent – for example – in some areas of Australia, cattle have been run where wild dogs are troublesome and the loss of sheep excessive. This represents a balanced outcome to live with wildlife and not exterminate all wildlife which impacts on rural activity. Control programs should aim to identify and minimise the unwanted impact of the pest species rather than simply controlling the species itself.

A more coordinated proactive approach of wildlife population control is required – currently it is more reactive. Kangaroos are the obvious species that require extensive research applied to arrive at solutions. Adverse animal welfare impacts that present in large numbers (such as starvation) is a factor that should also be factored in to decision making.



## The Application Process

The AVA does not support proactive applications that allow for permits to be granted before damage is done except where a definite pattern of damage can be established over many years. In these instances, a wildlife management plan should be produced in conjunction with DELWP to find more effective methods of control.

We believe shooting competency training should be mandatory for any lethal control. The ACT Kangaroo Management Plan notes that shooter competency and knowledge of humane killing methods is lower in the non-commercial sector than the commercial sector and that this has raised ongoing animal welfare concerns. The ACT has the strictest requirements for licensing of non-commercial kangaroo shooting in Australia. Kangaroo culling requires a special shooter's licence under the *Firearms Act 1996*. Holders are required to pass an accuracy test every two years as well as a macropod identification test. We support the recommendation of the RSPCA that all non-commercial licence holders be required to successfully undertake the section of the game meat harvesting course covering humane killing, as well as firearms competency course that includes a shooting accuracy test.

The AVA also believes that public education campaigns on wildlife control permits via television, radio and social media are necessary to assist the public in understanding the process. In a multi-cultural state such as Victoria, it is imperative that the public are educated on wildlife control and most importantly – the importance of wildlife and how the various species must be treated in respect to animal welfare standards. The public need to be aware that aggressive responses from wildlife may occur in response to humans infringing upon the territory of the wild animal. Education is important to ensure that people avoid particular situations of encroachment.

## Decision Making

The AVA has concerns that many applications are only subjected to desktop assessments and that property inspections are not carried out. Site inspections should ideally be conducted on those properties using lethal control or those involving large amounts of animals. It is possible that sufficient resources are not available to DELWP for this to happen but for the best outcome for animal welfare, site inspections are recommended.



We acknowledge that an Independent Panel of Expert (IPE) reviews and provides advice to wildlife officers on complex ATCW applications or wildlife management matters. It should be legislated that the Minister is required to take advice from the IPE on wildlife matters and decisions not in accordance with their advice must be justified.

The competency of an applicant to carry out a particular control method must be closely examined and verified before being approved so as to ensure good animal welfare outcomes.

A damage estimate calculator (as used in other states) may be useful as a tool for modelling to estimate damage caused by wildlife if it can be satisfactorily adapted to Victoria.

### **Compliance Monitoring and Enforcement**

The AVA does not fully understand how DELWP ensures compliance of conditions of the permit and that permit holders are not breaching *POCTAA*. We would welcome further information on this issue.

The AVA supports that ATCW holders should be required to submit returns to DELWP which state how many animals were controlled – this should be mandatory. This data should be collated and publicly available.

We recommend that random inspections be sanctioned for to enable verification of reporting and that infringement notices and on-the-spot fines be available tools for breaches. Agents acting on behalf of applicants must also be listed on the application to verify competency.

The AVA does not support that Governor in Council Orders should be issued to allow the disturbance (non-lethal control) of common wildlife species such as Eastern Grey Kangaroos and Musk Lorikeets, subject to conditions, without the need for individual authorisations because an Order would likely result in appropriate reporting.

### **Traditional Owner involvement in the ATCW system**

The AVA supports in principle to improve Traditional Owner access to Country and its resources but “access to wildlife for cultural purposes” must be clearly defined and comply with current animal welfare standards. While it is true that Aboriginal people have a long standing and deep cultural connection with the land and wildlife, the current status of wildlife and habitat in



Australia has vastly changed since European settlement. Because the management and agricultural systems are very different from pre-European times, traditional methods need to be viewed in the current context. Unregulated practices of wildlife management by traditional owners need very careful consideration and must comply with both animal welfare and public health legislation.

### **Information provision**

The AVA believes it would be very beneficial for DELWP to work with landholders across multiple properties to produce a coordinated wildlife management plan. We are also supportive that in areas where there are differing views about wildlife issues and the need for control, that DELWP should encourage meetings between all stakeholders to discuss the issues and the approach.

We are pleased that DELWP is moving to a new online wildlife licencing system which will have a greater reporting capacity, allowing DEWP to publish additional information about the ATCW system.

For safety reasons, we would recommend that Immediate neighbours of landholders that have successfully been granted a control authority be notified by DELWP, advising of the planned control method and when it will happen – especially when baiting, trapping or shooting is occurring.

The AVA is supportive of transparency of data regarding how many animals are controlled under ATCWs and also to the release of data relating to non-compliance and prosecutions providing it does not identify the personal details or location of the offender.

### **Broader issues**

The AVA would like to see DELWP collate road collision data involving wildlife from all car insurance agencies (not just RACV) so we have a more accurate data that can be thoroughly analysed. This would assist in identifying problem areas where remedies may be able to be implemented, ie wildlife-proof fencing.

We are pleased that DELWP is developing an online wildlife incident reporting tool to assist members of the public contact someone who can assist if they come across sick, injured or orphaned wildlife. Those rescue resources, although must be verified as adequate and reporting of rescues and details of rehabilitations should be documented.



We don't believe there should be a need for buffer zones around wildlife shelters as wildlife should only be released where they were originally found.

A broad and extensive consultation on rehabilitation of common species based on evidence needs to occur to enable strategies to be developed for best practice animal welfare and the AVA would welcome being involved in this. Ground-truth data must be analysed for purposes of both measuring the success of rehabilitated animals (with tracking technology) and for purposes of population control. If this data is not available, steps to undertaking the research must be a high priority.

The AVA can see no reasonable explanation as to the exemption from *POCTAA* which applies under the *Wildlife Act 1975*. The same adherence to animal welfare standards should apply universally. All forms of control, lethal and non-lethal should comply with *POCTAA* or a code of practice incorporated under the Act. We believe this issue should be addressed.

### AVA Contacts

- Dr David Middleton – President, AVA Victorian Division  
M: 0448 224 004 E: [david@mountmary.com.au](mailto:david@mountmary.com.au)
- Ms Susan Chandler - Executive Officer, AVA Victorian Division  
P: (03) 9600 2930 M: 0418 990 338 E: [execvic@ava.com.au](mailto:execvic@ava.com.au)

### References

[AVA Policy - Control of native and introduced animals causing damage to agriculture or habitat](#)

[AVA Policy - Kangaroo and wallaby population control](#)

[AVA Policy – Harvesting and Culling of Native Fauna](#)

[ACT Kangaroo Management Plan](#)