

# NSW Pest Animal Management Review March 2016

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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 for pharmaceutical and other 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 AVA supports the improvement of control methods for introduced terrestrial and freshwater vertebrate species in NSW to potentiate economic, environmental and social benefits. However, the success of this change will depend upon all relevant stakeholders recognising and embracing the changed environment, especially in rural and regional New South Wales. Regulations will have to be robust and clearly defined and written with the input of all appropriate parties – government, industry, the veterinary profession, producers and land and water managers.

The key points of concern we have with the implementation of this reviews recommendations can be summarised as follows:

- The review enshrines a new arrangement of shared responsibility for matters of pest management, with landholders and other primary producers taking more responsibility than in the past. The AVA feels pest management is not only a responsibility of these key stakeholders but all members of the community as pest animals affect rural, regional and metropolitan communities.
- If shared responsibility is to be a better way of managing the pest animal risks faced by our agricultural industries, it is imperative that all stakeholders including individual producers, National Parks and Wildlife Service (NPWS), Local Councils, Local Land Services (LLS) and industry bodies are thoroughly advised and understand their new responsibilities. To do this properly it will require an effective extension and education program which will initially require more, not less, government resources in order to create true efficiencies over time. It will also be imperative that control methods are managed by persons with knowledge in the area, such as the Local Land Services Invasive Species and Plant Health Teams.
- The AVA does not agree with pest animal management being facilitated by Regional Pest Animal Committees as we believe there is the potential for people without knowledge in this area, or vested interests, to be managing programs. This would lead to major inefficiencies, ineffective control and potential animal welfare concerns. The AVA believes the LLS needs to be employed in the role of management facilitator and have support through robust and well considered legislation and regulations.
- The review mentions “animal welfare” and “welfare” 22 times but there is no definition provided for either term. The AVA finds this concerning as, without definition, the term can be open to ambiguity and individual interpretation. “Pest” animals are sentient creatures and their welfare should be genuinely considered in any policy. The AVA is well positioned to assist the Natural Resources Commission (NRC) in providing clear definitions for “animal welfare” and “welfare” to avoid a situation where necessary control is hampered by public outcry in relation to methods employed.
- Maximum ‘buy-in’ and thereby successful uptake of the increased shared responsibilities will be enhanced with an increase in shared ownership by stakeholders. The regulations should contain a mechanism for setting and agreeing on key performance indicators for pest animal management and greater transparency in the reporting of the outcomes achieved against

- the indicators.
- The process of compiling the regulations is underway, yet it is unclear who is engaged to complete this task. Due to their significant training and expertise in matters of animal welfare, animal behavior and disease spread (epidemiology) both public and private veterinarians should be represented in the process of writing the regulations. AVA can assist with this task.
- There are some specific suggestions below on pest animal management identified in our review of the draft report.

## Points of concern

### Welfare

#### 1. *Definition*

Terms such as “animal welfare” and “welfare” are not defined. . This is concerning given this policy has the potential to impact on the welfare directly of pest species but indirectly on the welfare of other species. Given that animal welfare impacts, animal welfare groups, welfare concerns, welfare considerations, animal welfare outcomes, welfare-based codes of practice and animal welfare perceptions are mentioned, it seems absurd that this document makes no attempt to define animal welfare. It is thus open to the criticism that animal welfare has not been considered a key issue in this review.

#### 2. *Control Methods*

Animal welfare, even for pest animals, needs to be considered in the employment of control methods. To ensure this the AVA would recommend that continuing research is conducted in to the behaviour and distribution of each pest animal so the most suitable and effective control methods can be employed.

Recreational hunting has numerous welfare issues associated with it (see below) it as it is an uncontrolled activity and should not be employed as part of pest animal management planning. There is a role for professional, licensed shooters to be used in aerial shooting and on-ground residual work that is part of a broader control/eradication plan, and where the methods are regulated and monitored to ensure best animal welfare outcomes.

#### 3. *Non-target Animals*

The welfare of non-target animal species needs to be considered in any pest animal management program. Control methods could impact upon both domesticated and native animals and their welfare could be compromised if planning not adequate. The AVA recommends that the LLS are the lead body in pest animal management and LLS Biosecurity Officers devise, supervise and help facilitate control/eradication programs to limit impacts on domesticated and native animals.

### Pest Animals

#### *Definition*

The AVA recommends clear definition of the “pest animals” to minimise misinterpretation of the term. The definition of “pest” used in the document is very broad and fails to acknowledge that the “term” pest is a relative term. Thus “For the purposes of this review, the Commission adopts the pest definitions provided by the National Biosecurity Committee (2015):

- a pest animal is any animal with the potential to have a negative effect
- an established pest animal is a pest animal that has self-sustaining populations in Australia and is not considered eradicable. It may be distributed widely across NSW or only regionally. A regionally-distributed established pest may be the subject of containment measures to mitigate further spread (p14 of 130). This is concerning as *any* animal has the potential to have a negative effect (on other animals, on people, on the environment, for example). It is also concerning as once under labelled a pest, eradication of that animal is condoned and even promoted. We recommend that the definition of pest should be revisited and the fact that pest status directly

relates to human interests must be made clear and transparent.

This is particularly critical for peri-urban and urban areas where an animal could be considered a pest by one individual and a pet by another. Clear definition of the animals and the impact that is deemed indicative of pest animals needs to be written in the regulations so all stakeholders are aware of their position and obligations.

The definition of these “pests” must be clear so certain species that are impacting negatively on our environment or agricultural industries can be controlled without public backlash. This is certainly the case for animals such as cats, rabbits, horses, deer, dogs and fish. To avoid misinterpretation clear definition of what is deemed a “pest animal” needs to be established. This includes pet animals involved in the attack of wildlife or livestock, especially in the peri-urban environment.

#### *Principles of pest control*

The principles on which the current review has been based are not clear. We suggest that ethically sound vertebrate pest control frameworks should be based on sound principles, notably:

- 1) The aims or benefits and harms of each control program must be clear;
- 2) Control must only be undertaken if the aims can be achieved;
- 3) The methods that most effectively achieve the aims of the control program must be used;
- 4) The methods must be applied in the best possible way;
- 5) Whether or not each control program actually achieved its precise aim must be assessed;
- 6) Once the desired aims or benefits have been achieved, steps must be taken to maintain the beneficial state (Littin, Mellor et al 2004).

### **Regional Pest Animal Management Committees**

The AVA is concerned about the establishment of regional Committees as the lead bodies for each area in relation to pest animal management. Our concerns are:

- I. Lack of suitable people for committees in a number of areas – population issue
- II. Lack of knowledge on control methods and what constitutes effective control
- III. Members of the committee prioritizing pest animal species due to the impact on their own enterprise.
- IV. Inability for numerous individuals to work together on a common issue. Various priorities, differing enterprises, logistical issues, belief systems and personalities.
- V. Addition of another tier of “management” in controlling pest animals so taking funds to facilitate another committee rather than investment in on-ground works.

The AVA believes LLS Biosecurity Officers are better qualified to carry out this role.

### **LLS Biosecurity Officers**

The AVA recommends that the LLS Biosecurity Officers already currently employed to manage Pest Animals are given the mandate to:

- I. Prioritise areas for pest animal management based on their knowledge and expertise
- II. Plan integrated control programs for which there is compulsory involvement by land managers in that area – landholders, NPWS, local council
- III. Oversee operational activities by land managers or contractors employed to carry out on-ground works.

The LLS needs strong and clear regulations to be written to ensure the officers have the power to achieve effective control/eradication of pest animals. This includes defining what control methods are not deemed suitable, best practice in relation to each control method and powers to enforce participation. Effective control is underpinned by the participation of all land managers and the LLS Officers need the powers to ensure this happens.

The LLS Biosecurity Officers already employed to deal with pest animals are adequate for facilitating the programs and there is no need for another person to be employed in each area as a facilitator.

# Recommendations

## **Provide transparent state level leadership and accountability**

The AVA wants clarification on how “objectives and priorities, measurable targets, roles and responsibilities and timeframes for delivering prevention and control of pest animals” will be achieved and who will be involved in establishing these parameters.

As scientists, veterinarians believe decisions should be based on clear scientific evidence and not on perceptions, public opinion and short term cost saving measures.

To ensure the above points are achieved the AVA recommends Government experts, research scientists and LLS Biosecurity officers are consulted on the matter. It is imperative that the logistics involved in pest animal control are considered, especially when so much onus is being transferred to landholders.

## **Landholder Responsibilities**

The AVA agrees that landholders, and other land managers such as NPWS and Local Councils, need to be actively involved in the control methods. For effective control all land managers in an area need to work on the program together.

For many landholders there are issues with adequate manpower to carry out certain control methods effectively. The employment landscape in rural and regional New South Wales has changed significantly in the last 20-30 years and many agricultural enterprises are now grossly undermanned.

It must be acknowledged that physically some landholders would be incapable of carrying out effective control at the assigned time. In the most part this would be due to a lack of man power when there are concurrent enterprise priorities at that time such as sowing, hand feeding livestock or harvest.

This issue is real and must be considered in the overall establishment of Pest Animal Management legislation and regulations.

## **On-ground Staff or Contractors**

The AVA recommends the consideration of the employment of on-ground LLS staff or the use of contractors for pest animal management. The LLS already have well qualified and experienced staff to establish and maintain control programs but there is a lack of people to carry out the work especially for absentee and aged landholders, and those that are undermanned.

The AVA recommends the consideration of on-ground LLS staff whom could carry out the management work at a cost to the landholder or the use of approved contractors to do the work at the cost of the landholder.

The AVA believes more effective control could be achieved through this and it would in the long term prove to be more economically efficient.

## **Recreational Hunters**

Recreational hunting is not an effective method of control of pest animals. This fact is proven by considerable research and should be acknowledged in the establishment of regulations around pest animal management. Culling by shooting, carried out by professional, licensed shooters, and using approved techniques monitored for their animal welfare impact, can be used in an integrated control program where individual animals need to be targeted or aerial shooting needs to be employed.

Recreational hunters can include those using firearms, cross-bows and knives and there is little or no regulation of their activities. This raises significant animal welfare issues in relation to the animals being targeted, non-target animals being “collateral damage” and the welfare of their own animals such as hunting dogs which are frequently injured by the activities. Also there is the potential for hunting dogs to become “lost” and then become part of the wild dog problem.

There is strong scientific data from the USA that definitively showed the introduction of “hog hunting”

actually spread the range feral pigs instead of reducing their range and numbers.

Thus recreational hunters should not be used as part of the control methods. Also their activities should not influence how control/eradication programs are run as the environmental, economic and social impacts of feral animals are exponentially more important than the pursuit of hunting for fun.

### **Economic Impacts and Relative Importance of Pest Animals**

The AVA recommends that absolute costs and the relative importance of each pest animal needs to be clearly defined. This will allow for priorities to be set and realistic goals to be outlined and achieved.

The AVA believes the economic impact of pest animals cannot be based solely on current economic impact but must also include the potential economic impact if that pest animal increases in number or is involved in the spread of a disease of significant economic importance, such as Foot and Mouth disease (FMD). Prevention costs may seem high but relative to the control costs and associated economic fall-out of a disease, such as FMD, prevention is by far the most economically viable option.

### **Surveillance and Research**

The AVA recommends that surveillance techniques should be employed based on the significant data that can be gained and not on a cost effective base. Investment in surveillance is imperative in being able to obtain data that will help develop effective control methods through improved knowledge around pest numbers, behaviour, habitat, social groupings and impact.

The AVA supports the continuation of the CRC to provide data through effective research projects. The AVA also recommends the NSW Government supports research projects in local areas, conducted by LLS, Department of Primary Industries (DPI) or Landcare, to gain relevant and locally significant data for that area to facilitate appropriate management programs.