

Senate Environment and Communications References Committee

Inquiry into the impacts of feral deer, pigs and goats in Australia

RSPCA Australia Response to written questions on notice from Senator Urquhart

1. On 23 August the NSW Government announced that from 6 September deer could be shot on private property without needing a game licence. Are actions required following this announcement in terms of addressing animal welfare concerns?

Response:

RSPCA Australia is concerned that there are no competency requirements for shooting deer nor compliance with mandatory animal welfare standards. The recommended action is for any operator shooting feral deer to be competency assessed for shooting accuracy and for mandatory compliance with the nationally applicable [Standard Operating Procedure for Ground Shooting Deer](#). There are concerns that shooters will use chest shots rather than head shots which are not considered as humane due to the risk of immediate death not being achieved. Shooters should be required to head shoot deer unless there is substantial justification to use a chest shot. The RSPCA is also concerned that some methods commonly used by hunters cause unnecessary stress or suffering to deer and should be prohibited; these include the use of dogs and crossbows.

2. In your submission you raise the concern that listing feral deer as a pest species would effectively remove any protection under animal welfare legislation. Would you expand on that please? Do you say that because there is no model code of practice for deer and only one SoP for ground shooting?

Response:

While we acknowledge that listing feral deer as a pest species provides a mechanism for more effective management of the adverse impacts of deer, it also means that their level of protection under animal welfare legislation is effectively reduced. For example, under the WA Animal Welfare Act 2002, Part 3 Division 3 S24, it is a defence against a charge of cruelty if the person can prove that the alleged offence was committed whilst attempting to kill pests, that the method used was usual and reasonable and that reasonable steps were taken to ensure animals other than pests would not be harmed.

Furthermore, although animal welfare Codes of Practice and Standard Operating Procedures (SOP) exist for many declared pest species, compliance with these is not mandatory in most circumstances. In relation to deer, only one SOP exists and this is for ground shooting and there is no overarching model welfare code of practice (CoP) for feral deer. RSPCA Australia recommends that mandatory compliance with recognised CoPs and SOPs would help ensure improved welfare outcomes for feral deer through proclaiming these standards under welfare legislation in a similar way that livestock CoPs are enacted. An effective monitoring regime with appropriate penalties would also be required to help ensure compliance.

RSPCA Australia recommends that all control methods are assessed for humaneness and decisions made to prohibit the use of methods which pose an unacceptable risk to animal welfare. No [assessment of the relative humaneness of different methods](#) for deer control has yet been published, which makes it difficult for decision makers to easily identify the most humane method available.

- 3. The committee has received evidence from commercial hunters who argue they can contribute to control measures. Do you have any particular views on commercial hunting?**

Response:

Commercial hunters, who operate under government supervised programs which include mandatory compliance with recognised standard operating procedures, competency assessment of all shooters and independent in-field monitoring for compliance with welfare standards may assist with control measures in some circumstances. It should be noted that some commercial hunters may not shoot specified target animals unless this meets commercial imperatives and/or there may be a tendency to preserve some animals to ensure future availability to maintain the viability of their operations.

- 4. The National Farmers' Federation has recently stated (as part of its drought policy) that: "As a result of consultation with its members, the NFF has proposed the following immediate measures, for consideration by Government: ... 5. An increased federal-state focus on the eradication of feral pigs which are a biosecurity risk and a highly destructive pest, particularly in drought."**

Do you support the NFF's recent call for an increased federal-state focus on the eradication of feral pigs? Please explain why or why not.

Response:

RSPCA Australia recognises the threats posed by feral pigs and advocates that any control program must be justified, effective and humane. This requires government supervised programs which are planned strategically and conducted humanely and effectively. Allowing broad-scale hunting of feral pigs is to be discouraged due to the inhumane methods used, including use of dogs. Random killing of feral pigs is not considered to be effective but rather localised well planned, monitored and evaluated programs should be implemented with adequate oversight. Furthermore, eradication is unlikely to be achievable due to a number of factors including very high numbers of feral pigs, reproductive rate, adaptability to suitable locations, broad geographical distribution including remote areas and lack of reliable, cost-effective eradication methods.

- 5. On 8 November 2019 the Minister for Agriculture announced the establishment of a National Feral Pig Coordinator, with Commonwealth funding of \$1.4 million over the next three and a half years to support this role. Do you have any views on this announcement, and how the Coordinator should undertake their activities?**

Response:

RSPCA Australia recommends that the new coordinator ensures that animal welfare aspects are considered as part of a national feral pig control program. This includes implementing requirements to ensure humane practices are conducted and inhumane practices are prohibited under state legislation. Based on the [Relative humaneness matrix for feral pigs](#), the RSPCA recommends that the use of warfarin and CSSP are prohibited. In addition, where baiting is carried out, that sodium nitrate is used wherever possible to avoid the use of 1080. Furthermore, specific practices such as bow hunting, killing with knives and use of dogs should be prohibited on welfare grounds as well as the potential heightened risk of spread of infectious agents due to blood spilling.

- 6. Please provide information on any other relevant developments you believe the committee should be aware of since providing your submission.**

Response:

N/a

END