CHAPTER 5

CURRENT METHODS OF CONTROL

Introduction

5.1 Several methods of control are used to control large feral animals. These methods of control include muster and transport to slaughter or domestication, ground shooting and helicopter shooting.

5.2 Of all the issues raised in evidence, the methods employed to control large feral animals attracted the most concern. Over recent years, this concern has prompted national and international protests about the perceived cruelty of control methods used in Australia, particularly the shooting of feral horses and buffalo from helicopters.

5.3 The Committee recognises that sections of the Australian community are concerned about control methods used in this country. The Commonwealth Department of Primary Industries and Energy also advised the Committee that international concerns have the capacity to damage Australia’s international image and the potential to affect adversely the tourist industry and export trade.¹

5.4 In this chapter, the Committee considers the following matters:

- implementation of methods of control;
- muster and transport of feral animals; and
- helicopter shooting.

Implementation of Methods of Control

5.5 Although the procedures adopted to control large feral animals depend on the species involved, methods used to control horses and buffalo follow a similar pattern.

5.6 Firstly, commercial use of feral animals is encouraged. Some animals are mustered and trapped for domestication or introduction into controlled herds. Most, however, are mustered, yarded and transported to abattoirs for slaughter, processing and sale. Buffalo and horse-meat from the Top End have been supplied to local and overseas markets for human consumption and pet meat. Horse-meat from central Australia is exported for human consumption. Commercial use is viable when animals are abundant and readily accessible.²

5.7 The submission of the Australian National Parks and Wildlife Service confirmed that the preferred option of ANPWS is for feral cattle and buffalo to be mustered for sale or slaughter at an abattoir.³
5.8 Usually, mustering of feral horses is done by helicopters. Trapping is centred around natural or artificial waterholes and therefore is more effective during dry periods when there are fewer watering points and better ground access for transport.

5.9 Commercial use of large feral animals is not always possible. For example, the numbers of feral animals may make the operation uneconomic. Rough and inaccessible terrain also makes mustering from the ground and air difficult. Additionally, not all feral animals have an economic use. For example, the Committee was advised that feral horses from central Australia cannot be used for pet meat. A toxin from indigofera plants, which grow in the area and are eaten by feral horses, accumulates in horse-meat and is poisonous to dogs.4

5.10 Secondly, when harvesting is uneconomic, lethal methods of control are applied. Lethal methods include “shooting to waste” from the ground and from helicopters.

5.11 Shooting from the ground is “often considered the most effective and often the only method for humanely destroying feral animals”5. This view, expressed by the Northern Territory Government, is supported by animal welfare groups such as RSPCA Australia. Based on its work with ANPWS in relation to the culling of kangaroos, the Society considers that one bullet placed in the brain of an animal where it stands can only be considered a humane death.6

5.12 Information papers on the control of feral animals prepared by the Commonwealth Department of Primary Industries and Energy also recognise that shooting from the ground is the most humane method of culling, especially when the marksman and target are both stationary.7 The Committee concurs with these views.

5.13 According to the Northern Territory Government, shooting from the ground is implemented when foot or vehicle access is good, the control area is small and the temperament of the animal allows a close approach.8 It is impractical where large-scale control is required, access is difficult and rapid pursuit by vehicle is impossible. The Territory Government maintains that shooting from the ground is “only applicable to very restricted areas in the Northern Territory”. Therefore, control by shooting from helicopters is necessary.8

5.14 According to the Territory Government, shooting from helicopters “is the end of the queue in terms of the choice of methods used”.9 The submission from the Northern Territory Government identified three prerequisites for shooting from helicopters. These are:

- commercial possibilities have been exhausted;
- mustering and trapping methods fail or are not possible because terrain is inaccessible except from the air; and
- suitably trained pilots and shooters are available.10
5.15 Mr Graeme Davis from the Territory’s Conservation Commission stressed that a significant proportion of feral horses and buffalo have been mustered for commercial use. He added:

Killing from helicopters is certainly not the only option. Unfortunately, it is the only method that remains once commercial utilisation has been completed ... If we are to effect reasonable reductions in numbers, helicopter culling is the only method we currently have at our disposal.\textsuperscript{12}

![Rugged and inaccessible terrain west of Hermannsburg, Northern Territory.](image)

“Shooting from the ground is impractical in most instances where large scale control is required, where access is difficult and rapid pursuit by foot or vehicle is impossible”. Evidence, Northern Territory Government, p. 65.

5.16 The Northern Territory Government maintains that culling of large feral animals is carried out with due regard for the welfare of animals involved. According to the Government, the control methods involve the lowest level of suffering which current technology can provide, consistent with effective control.\textsuperscript{13}

5.17 The Government maintains that the transporting of feral animals, particularly horses, or their instantaneous death by gunshot from the field is relatively humane when compared with death by starvation or thirst.\textsuperscript{14}
5.18 Officers of the Territory Government advised the Committee that personnel involved in the control of feral animals adhere to the Model Code Of Practice on the Welfare of Feral Animals adopted by the Australian Agricultural Council in 1989.15

5.19 Animal welfare groups raised significant concerns about current control methods. For example, ANZFAS maintains that all methods currently used to control feral animals have severe problems and reliance on them hinders the development of humane, non-lethal, long-term strategies.16

5.20 In response to questions from the Committee on the relative merits of current control methods, representatives of the animal welfare organisation indicated that it was not possible to choose between them “because we reject them”.17 Ms Oogjes added, however, that if feral animals were mustered as part of a control operation “my opinion is that they should be yarded and shot [with a silencer] rather than subjected to the rigours of transportation”.18 Dr John Auty, Honorary Technical Adviser, ANZFAS, offered the following comment:

I am a simplistic fellow. I say, shoot them in the head, on the ground, when you have an opportunity shot, and keep on doing it and keep on doing it.19

5.21 The Federation registered its opposition on animal welfare grounds to the transport of feral animals, particularly feral horses, and helicopter shooting. These matters are considered in the following sections of this chapter.

Muster and Transport of Feral Animals

5.22 As indicated previously, feral buffalo and horses are mustered, yarded and transported to abattoirs by commercial operators.

Buffalo

5.23 Officers of the Northern Territory Government explained the basis of the buffalo harvesting industry. Mr Bryce stated:

Traditionally, ... the buffalo industry has been based not on farming of livestock but on harvesting of feral livestock. The simple principle is that you go out once a year ... and take out the animals that you can catch and that are marketable and the remaining animals become your breeding population.20

5.24 Although helicopters are used at times, feral buffalo are usually rounded up by bull catchers — stripped down four-wheel-drive vehicles.

5.25 As a result of the BTEC program, the buffalo harvesting industry is currently in a “dormant phase”.21 Officers of the Territory Government, however, predicted that the industry would be re-established.22
5.26 The Committee questioned officers of the Territory Government on the animal welfare aspects of the buffalo harvesting industry. Mr Bryce observed that economics and self-regulation play a role in safeguarding animal welfare. He explained:

Economics obviously comes into it. It is not useful to muster animals if you get them into a yard and find it is impossible to get them to an abattoir, for example. That is the general aim, so a good stockman is going to get a better return from his operation by treating animals in a humane manner ... Often they are contractors who are doing a job and they are not going to be employed if they have a bad reputation for the way they present animals once they have been mustered.23

5.27 He also advised the Committee that the Model Code of Practice relating to feral animals applies to private commercial operators in the buffalo harvesting industry as well as government personnel. It was suggested that when the harvesting industry resumes the code should be distributed and its importance promoted to the industry.24 The Committee has addressed this matter in Chapter 2 of the report.

5.28 The Committee also questioned officers of the Australian National Parks and Wildlife Service about the removal of buffalo from Kakadu National Park.

5.29 Officers of the Service advised that contracts are let by public tender for the live capture and removal of stock from the Park by private contractors. The Northern Territory Department of Primary Industry and Fisheries usually supervises these procedures.25

5.30 An example of one of these contracts, tabled in evidence to the Committee, contains the following conditions:

- stock shall be handled or destroyed in a humane manner;
- as soon as practicable after capture, all stock shall be transported to the abattoir; and
- while stock are awaiting transport or slaughter, proper and adequate food and water shall be provided.26

5.31 Although contracts for the removal of stock address animal welfare considerations, ANPWS raised concerns about procedures associated with the muster and transport of buffalo. For example, the submission of ANPWS contained the following description of mustering operations in Kakadu.

Mustered operations entail the running up of stock by helicopters with sirens. These animals are concentrated towards a trap, where they are herded into a yard by four-wheel-drive vehicles. From the yard, animals may be loaded and transported directly to the abattoir or to another holding yard. In some situations, stock have endured holding in yards for up to seven days before reaching the abattoirs. During the operation, animals are often stressed as they
may be rammed by vehicles, prodded with electronic shocks, branded and held in yards where at times conditions are unsuitable.²⁷

5.32 ANPWS also indicated that stock officers have observed losses due to poor condition, constriction, dehydration, injuries incurred during capture and heat stress.²⁸

Conclusions

5.33 The Committee recognises that the Australian National Parks and Wildlife Service places considerable importance on animal welfare considerations. Nevertheless, the Committee is of the view that the Service must take a more positive role to safeguard the welfare of feral animals and, in particular, buffalo removed by private contractors from Kakadu National Park.

5.34 The Committee recommends that the Australian National Parks and Wildlife Service let contracts for removal of feral animals only to those private contractors who can satisfy the Service that they pay due attention to the welfare of animals. Additionally, contracts for the removal of feral animals should contain provisions for immediate termination if there is evidence of maltreatment or inattention to the welfare of stock.

Horses

5.35 Feral horses in the region of Alice Springs are mustered and transported to an abattoir at Peterborough in South Australia. The horse-meat is exported for human consumption. The Committee addresses issues relating to the transport of livestock, including feral horses, in a forthcoming report.

5.36 Several witnesses who appeared before the Committee were opposed to the muster and transport of horses. For example, the Australian Equine Veterinary Association maintains that the transport of captured feral horses over distances of up to 3,000 kilometres to abattoirs for the horse-meat trade “is untenable and inhumane”.²⁹ The Association explained its view on this matter in the following terms:

This experience would be a significant stress for a domestic horse used to travelling but must be quite horrific for a trapped wild horse.³⁰

5.37 The Association considers that the inherent problems in the handling, shipping and holding of feral horses are sufficient to stop the use of feral horses in the export horse-meat trade.³¹

5.38 According to the Association, the percentage of the export horse-meat trade that is supplied by feral horses has fallen from about 80 per cent to about 25 per cent.³² Representatives of the Association told the Committee that the
domestic horse population, “so many of which are neglected, undernourished or foul
tered”, could supply this market. The use of domesticated horses for this purpose was also supported by RSPCA Australia.

5.39 Although recognising the need to control feral animals, ANZFAS is opposed to the commercial utilisation of wildlife, particularly the transport and slaugher of feral equines. The Federation stated that “there is much opportunity for abuse — deliberate or inadvertent — of transported animals”. According to ANZFAS, economic or resource-based arguments should not take precedence over the welfare of feral animals. Transport to distant slaughter facilities is not consistent with due regard to animal welfare and therefore cannot be supported. Ms Oogjes of ANZFAS expressed concern about transport methods and the long distances involved and described the whole process as “quite horrific”.

5.40 This view is not shared by other animal welfare organisations, such as the Australian Federation for the Welfare of Animals, which considers that problems with feral animals would be reduced “if the feral animal has a cash value for its meat and an industry can be built around the culling of these animals”.

5.41 Although it supports the commercial utilisation of feral animals, the Northern Territory Government recognised that the transport of horses “appears cruel” and “conditions for horses during transport should be looked at to identify where improvements could be made”.

5.42 The Committee notes that the Bureau of Rural Resources has conducted a study on this matter entitled Welfare of Horses being Transported. Although information from particular abattoirs shows that between 0.5 and 3.00 per cent of horses die or are injured significantly, direct observation of consignments to abattoirs indicate that this figure may be as high as 18 per cent.

5.43 The report concludes that improvements in the welfare of transported horses are necessary. The report identifies five major areas of reform including:

- vehicle design;
- rationalisation of State legislation;
- licensing of transporters with penalties for breaches of animal welfare guidelines;
- new abattoirs close to areas of mustering; and
- further research, including research into double-decked transport of horses.

5.44 The report of the Bureau of Rural Resources identifies several concerns that were also raised with the Committee during its inquiry.
5.45 Firstly, the use of double-decked trucks is seen by many as inhumane as horses on the lower deck cannot raise their heads above wither height. This results in higher levels of stress and injuries. Proponents of double-deckers argue that injuries occur on the top deck no more frequently than on single-deckers where conditions are similar. It is also maintained that horses selected for size can be transported in double-deckers without any increased injury problems. These views are supported by a study conducted in 1987 by Mr John Lapworth, an officer of the Queensland Department of Primary Industries.41

5.46 The Committee notes that double-deck transport of horses was banned in New South Wales in 1987 and that an on-going review is being conducted in Queensland.

5.47 Secondly, welfare problems occur as a result of the long distances that horses must travel. The report of the BRR indicates that horses from the Gulf of Carpenteria are transported by train to Brisbane and by truck to Peterborough in South Australia. They are also transported to Peterborough from the Northern Territory and Western Australia.42

5.48 The South Australian Government advised the Committee that Peterborough is likely to be the only horse abattoir left in Australia and that feral horses are likely to be transported hours in excess of the current guidelines contained in the Model Code of Practice. It was suggested that a network of rest or emergency stops on major transport routes, rostering of two drivers on long trips to eliminate driver rest stops and further education programs would contribute to improved treatment of animals.43

5.49 Thirdly, although there seems to be a degree of self-regulation in the industry, particularly on the part of the management of abattoirs, “certain people employed in the horse transport industry do not place a high degree of importance on the welfare of the animals they are transporting”.44

5.50 As part of its inquiry into the transport of livestock within Australia, the Committee went to Adelaide to hear evidence from State Government officials. It also went to Peterborough to inspect the abattoir and to hear evidence from a representative of Metro Meats Limited, the proprietor of the abattoir. During the course of the public hearings, evidence was given on the use of feral horses in the export horse-meat trade.

5.51 Dr Mary Barton, Chairperson of the South Australian Animal Welfare Advisory Committee expressed strong concerns about the transport of feral horses. She commented that “there are pretty disastrous animal welfare issues in trying to transport wild horses, especially if Peterborough is going to be the one place that is going to be slaughtering them”.45 In advocating the elimination of feral animals, Dr Neumann, an officer of the South Australian Government observed that “it is important that we do not make an industry out of the culling of feral animals”.46
5.52 Mr Peter Hubbard, the Manager of the Metro Meats’ abattoir at Peterborough, rejected claims that the transport of feral horses over long distances was inhumane. He advised the Committee that “if there were a serious problem with the transportation of animals over long distances, there would have been a lot more action a lot sooner”. According to Mr Hubbard, the Peterborough abattoir has encouraged the highest standards in transportation, holding, feeding and managerial control of feral horses. These standards are supervised by a Commonwealth veterinarian at the abattoir. Mr Hubbard stated:

I believe that the results we are achieving today are far superior to those being achieved currently for beef, sheep or, indeed pigs. Having achieved those results I therefore feel that the industry is exhibiting that it can self-regulate.48

5.53 Of the 30,000 domestic and feral horses slaughtered at Peterborough annually, approximately 60 are dead on arrival. Mr Hubbard observed that this rate compared more than favourably with the attrition rate of other livestock being transported to slaughter.49

5.54 When questioned on the stress and trauma associated with the transport of feral horses, Mr Hubbard replied that the horses are slaughtered in sound condition and that the dressing of meat does not show signs of stress resulting from long journeys.50

Conclusions

5.55 On the basis of evidence presented during the inquiry, the Committee registers strong concerns about the welfare of feral horses being transported, particularly over long distances. The Committee considers that the prolonged stress and trauma associated with this practice is unconscionable and cannot be condoned. The inherent welfare problems involved in handling, transporting and holding feral horses are sufficient to raise serious questions about their continuing use in the export horse-meat trade.

5.56 The Committee recommends that the Minister for Primary Industries and Energy, in consultation with other members of the Australian Agricultural Council, review the continuing use of feral horses in the export horse-meat industry, with particular regard to animal welfare issues associated with this industry.

5.57 If feral horses continue to be transported and used for commercial purposes, the Committee considers that the study by the Bureau of Rural Resources entitled Welfare of Horses Being Transported contains positive recommendations on improvements to the welfare of feral horses being transported.

5.58 The Committee recommends that the Minister for Primary Industries and Energy, in consultation with other members of the Australian Agricultural Council, consider, and where appropriate, implement the recommendations contained in the working paper by the Bureau of Rural Resources on the Welfare of Horses Being Transported.
5.59 If feral horses continue to be transported and used for commercial purposes, the Committee reaffirms its view that the Model Code of Practice for the Welfare of Animals: Destruction or Capture, Handling and Marketing of Feral Livestock Animals should be published in an authoritative format and made readily available.

5.60 The Committee places on record its strong concerns about the use of double-decked vehicles to transport feral horses. The Committee intends to address this matter in greater detail in its forthcoming report on Transport of Livestock within Australia.

Helicopter shooting

5.61 During the inquiry, the most contentious issue related to the shooting of feral animals from helicopters. This method of control has also been perceived by overseas animal welfare groups as cruel and inhumane. The Committee, therefore, considers that it is important to record in some detail the evidence on this difficult and emotive issue.

5.62 According to the Territory Government, shooting from helicopters “can be quick, effective and relatively humane method” of controlling large feral animals”. Helicopters can approach feral animals closely, facilitating a clearer and more accurate shot than may be possible from the ground. Helicopters also allow speedy follow-up and dispatch when animals are wounded. Similar comments on helicopter shooting were expressed by the Australian National Parks and Wildlife Service.

5.63 The Territory Government considers that culling operations conducted by Government personnel from helicopters are “of a very high standard” and “result in a quick, humane death”. Remoteness and difficult terrain make helicopter shooting, in most instances, the only practical and cost-effective method of control. The Northern Territory is of the view that helicopter shooting must remain available to authorities as an option in feral animal control.

5.64 The Department of Primary Industries and Energy also recognises that, in certain instances, helicopter culling is the “preferred and humane method” of controlling large species, such as horses, donkeys, buffalo and pigs, when they congregate in remote, rugged and inaccessible terrain. To be humane, helicopter shooting must be correctly planned and conducted by well-trained and competent government or government-supervised personnel.

5.65 In relation to Kakadu National Park, which is managed by a Commonwealth Government agency, officers of ANPWS confirmed the approach noted in previous paragraphs. When questioned by the Committee on the need for helicopter shooting in the Park, Mr Hill replied:

We do not believe, at this stage, given the extent of the area we have to cover and the distribution of buffalo, that there is any real alternative to [helicopter shooting] in the foreseeable future.
“During dry times, I have seen up to 300 feral horses waiting to get a drink at one waterhole ... when that water hole dries up the horses die if they know no other water hole.” Evidence, CCNT, p. 126.

5.66 During the inquiry, the Committee travelled to the Northern Territory and took evidence from several witnesses involved in practical, day-to-day aspects of feral animal control, including helicopter shooting.

5.67 The Committee spent an afternoon with Mr David Lindner, an officer of the Gagudju Association in Kakadu and a person with many years’ experience with feral animals. When questioned about control methods, Mr Lindner observed:

If I were a buffalo and I had to go out by the whim of man, I would prefer to go out being shot from a helicopter.58
5.68 Mr Ross Bryan, an officer of the Conservation Commission of the Northern Territory, is a “horse lover”, races horses and has been associated with horses all his life. He told the Committee that his job is to shoot feral horses.\(^{58}\)

5.69 When questioned about the relative merits of control methods, Mr Bryan concurred with the proposition that shooting from helicopters is “the quickest and most efficient” control method currently available.\(^{60}\)

5.70 Mr David Berman, an officer of the Territory’s Conservation Commission and the author of several studies on feral horses in central Australia, impressed the Committee with his concern for the welfare of these animals. Mr Berman found it difficult to assess, on animal welfare grounds, the relative merits of shooting horses from helicopters and mustering. In relation to helicopter shooting, he observed that “it would be a very quick [death] for most of them”.\(^{61}\) He stressed, however, that the trauma associated with these methods of control did not compare with the agony associated with horses dying from thirst or disease during periods of drought.\(^{62}\)

5.71 Members of the Committee were impressed with the sincerity and the unanimity of views expressed independently by these witnesses.

5.72 RSPCA Australia recognised that there are “positive and negative” aspects to current methods of control but indicated that the Society is adamantly opposed to the killing of animals from moving platforms and, in particular, helicopters.\(^{63}\) When questioned on this view, however, Dr Wirth replied:

> There are a number of cases where eradication of feral animals from, say, a helicopter, might be condoned by the RSPCA. That, first and foremost, would be where there is no other method currently available. Secondly, where the people who are the shooters from the moving platform are properly trained with respect to the difficulties of shooting from that moving platform. Thirdly, where the weapons that are used are the correct weapons, ballistically speaking, for the job in hand. I have to say that the RSPCA’s experience ... has usually been that the people involved are not trained for the job at hand. In other words, their accuracy as sharpshooters leaves much to be desired, they have chosen the wrong weapons for the job in hand and they have not taken into account the variable problems of a moving platform.\(^{64}\)

5.73 When questioned further on the position of RSPCA Australia, Dr Wirth elaborated in the following terms:

> Perhaps I have not phrased it correctly. The RSPCA is of the opinion that moving platforms, as a general rule, should never be used, rather than just a blanket disallowance. But in certain circumstances where there is no other alternative, and provided all safeguards are in place, such as I have described, we would not stand in the way of that.\(^{65}\)
5.74 RSPCA Australia emphasised that endorsement of helicopter shooting encourages the “quick fix” response rather than co-ordinated, planned and supervised programs based on the welfare of the animals.\textsuperscript{66}

5.75 The issue of helicopter shooting was also raised with representatives of the Australian and New Zealand Federation of Animal Societies. When questioned on evidence concerning helicopter shooting and whether “it had its place” as a control method, Ms Oogjes responded:

Not a long-term place, no. If there is reliance on that method to the exclusion of trying to develop new methods, we do not accept it; we do not believe that all animals are going to be killed humanely. Obviously, it is true that in some areas that is the only way to make access. But that is only the reason it has developed; that does not mean that it is a good way to do things. We certainly cannot accept it on a long-term basis.\textsuperscript{67}

5.76 When questioned further on the Federation’s view on how an immediate and perceived feral animal problem should be addressed, Ms Oogjes responded:

What we are saying is that if a government, or any organisation that authorised feral animal reductions, is going to rely on these inhumane methods, then it must also make active contributions to looking for long-term solutions [such as fertility control]. It is in its own interest as well as the animal welfare interest.\textsuperscript{68}

5.77 The Federation concluded that current methods are “fatally flawed”\textsuperscript{69} and that political commitment and meaningful research support should be given to humane, non-lethal methods of feral animal population control and in particular fertility control. The Committee addresses alternative control methods in the following chapter.

5.78 The Australian Veterinary Association, incorporating the Australian Equine Veterinary Association, expressed the view that, on the balance of current evidence, strictly controlled helicopter shooting presents the most humane technique for a large-scale culling program of feral horses.\textsuperscript{70}

Conclusions

5.79 The Committee has recorded in detail the evidence it received on the shooting from helicopter of large feral animals, particularly in the Northern Territory. This evidence highlights the difficult, complex and emotive issues associated with this method of control. The Committee commends those who presented this evidence and in particular the animal welfare groups for their candid and considered responses.

5.80 Clearly, helicopter shooting is repugnant to both RSPCA Australia and ANZFAS. The Committee, however, gained the clear impression that representatives of both bodies who appeared at public hearings accepted, with
considerable reluctance, that professional and responsible helicopter culling operations may be necessary as a last resort where no other method is available.

5.81 Having observed the rugged and inaccessible terrain that feral animals inhabit in the Northern Territory, the Committee recognises that the preferred and most humane method of shooting from the ground is seldom a feasible method of controlling large populations of feral animals. Under these circumstances, the Committee considers that shooting from helicopters is the only practical method of control. In the Committee’s view, helicopter shooting represents the most humane method of controlling feral animals in inaccessible locations.

5.82 This conclusion weighs heavily with the Committee, as several witnesses recognised that helicopter shooting will invariably result in the inhumane death of some animals. This reality, however, must be weighed against the threat feral animals pose to native flora and fauna, the environment and public health. It must also be balanced against the distressing and agonising death of thousands of feral animals occasioned by drought and starvation.

5.83 Having considered all the evidence, the Committee is convinced that helicopter shooting of feral animals should continue. Nevertheless, it recognises, as was suggested in evidence, that “it is the best of a bad lot”.

5.84 It is the Committee’s view that procedures associated with helicopter shooting must be improved. These improvements will ensure a professional, responsible approach to helicopter shooting and in turn reduce the possibility of animals suffering. These matters are addressed in detail in the following chapter.
ENDNOTES

1. Evidence, Department of Primary Industries and Energy, p. 477.
4. Evidence, Northern Territory Government, pp. 63-64.
5. ibid.
7. Correspondence, Department of Primary Industries and Energy, 8 January 1991, p. 9.
9. ibid., p. 72.
10. ibid., p. 9.
11. ibid., p. 65.
12. ibid., p. 9.
13. ibid., p. 72.
14. ibid., p. 65.
15. ibid., p. 67.
17. ibid., p. 387.
18. ibid.
19. ibid., p. 388.
21. ibid.
22. ibid., p. 16.
23. ibid., p. 21.
24. ibid., p. 16.
27. ibid., p. 522.
28. ibid., p. 523.
30. ibid.
31. ibid.
32. ibid., p. 223.
33. ibid., p. 217.
34. Evidence, RSPCA Australia, p. 328.
35. Evidence, Australian and New Zealand Federation of Animal Societies, pp. 358-359.
36. ibid., p. 376.
37. Submission, Australian Federation for the Welfare of Animals, p. 3.
40. ibid., pp. 4-5.
42. ibid., p. 12.
46. ibid.
48. ibid., p. 678.
49. ibid., p. 686.
50. ibid., p. 694.
54. ibid.
55. Correspondence, Department of Primary Industries and Energy, 8 January 1991, p. 1.
56. ibid.
58. *Confirmed statement to Committee*, Mr D. Lindner, 19 November 1990.
60. *ibid.*, p. 144.
64. *ibid.*, p. 323.
65. *ibid.*
68. *ibid.*, p. 394.