

3rd May 2019

Director
Environmental Biosecurity Section
Department of the Environment
GPO Box 787
Canberra ACT 2601

Via mail: exotic.species@environment.gov.au

Dear Director

Re: Application to amend the live import list to include Puma for zoo display

RSPCA Australia is pleased to have the opportunity to provide a submission on this proposal. RSPCA Australia acknowledges that the focus of the assessment is to evaluate the suitability of this species for import into Australia primarily with regards to potential biosecurity and environmental impacts. The initial part of this submission addresses these two aspects in consideration of the justification for importing pumas into Australia, whilst the remainder focuses on important animal welfare concerns. Our submission primarily responds to the information and assumptions made in the draft terms of reference document provided by the application, Zambi Wildlife Retreat.

1. Biosecurity risks

Although the draft terms of reference suggest minimal disease risk, live imported pumas may still pose a risk in relation to different strains or pathogenicity of zoonotic diseases such as toxoplasmosis or species specific diseases, especially those caused by viruses, which may mutate to affect other felid species, including domestic cats.

2. Environmental risks

Pumas are native to North and South America, occupying a large proportion of the landscape indicating that they are not constrained to one particular area but survive in different ecological regions where prey animals exist. They hunt and consume different size and type of prey including small mammals. Based on stringent security measures for zoos holding large felids, the risk of escape may be considered low. However, the potential impact of a breeding pair existing in a regional area would be devastating to our native wildlife, especially as puma would not have a natural predator in Australia. Although very unlikely, there is a need to consider the possibility of hybridisation with feral cats, which would be devastating to our native wildlife.

3. Justification

RSPCA Australia believes the reasons cited in the application to include puma on the live import list are neither valid nor robust. Serious consideration must be given to the importation of live animals destined for captivity, given heightened community expectations regarding ethical and welfare aspects. Zoos today are required to defend their collections and practices to maintain social licence. Any relevant government processes should also consider key social concerns. An important basis for zoos to continue operating is that they play an important role in education and conservation of exotic animal species. In relation to puma, this justification is not valid.

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Puma are not considered threatened or endangered. It is also difficult to determine how puma could be considered an important focus of educational activities when they are not under threat.

The other reason cited for importing one or more puma to the facility operated by the proponent is to provide company for the existing 17 year old female. This is perplexing given that puma are by nature solitary animals and the journal article (Elbroch et al 2017) provided in the terms of reference as supporting evidence, describes tolerance between conspecifics in some free-roaming groups, which has dubious relevance to this situation. Case studies demonstrating successful co-habitation would provide some assurance regarding the likelihood of the existing female bonding with any introduced pumas. The facility suggests that there is sufficient space for 3 puma but does not describe any contingencies should incompatibility between the resident and introduced puma(s) occur. There is also no evidence suggesting that the existing female is suffering from lack of interaction with member(s) of her species.

4. Animal welfare

RSPCA Australia understands that animal welfare is not part of this initial assessment process but we have identified several animal welfare concerns including;

- Dimensions of the enclosure seems to be quite small especially for three individuals in terms of individual space availability including an area to retreat (without using night quarters or holding area) as well as opportunities for varied environmental enrichment
- Enclosure space is very limited when compared to reported home range for wild counterparts
- Enclosure space very limited when compared to travel distances of wild counterparts
- Concerns regarding the safety and effectiveness of reproductive control agents, especially as segregation may not be an option given the limited space
- Concerns regarding limited space should offspring be born

In conclusion, RSPCA Australia opposes the inclusion of puma in the live import list.

Should you require further information regarding this submission, please don't hesitate to contact me directly, devans@rspca.org.au.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Di Evans', with a stylized flourish at the end.

Dr Di Evans
Senior Scientific Officer
RSPCA Australia

Reference:

Elbroch, M.L., Levy, M., Lubell, M., Quigley, H., Caragiulo, A. (2017). Adaptive social strategies in a solitary carnivore. Science Advances 3 (10): e1701218 DOI: 10.1126/sciadv.1701218