

Draft National Feral Pig Action Plan

RSPCA Australia Submission

24 February 2021

This submission has been prepared by RSPCA Australia with input from RSPCA Victoria.

1. Introduction

We are pleased to see the Draft National Feral Pig Action Plan (the Draft Plan) being reviewed with public consultation being undertaken. It is pleasing that humaneness is incorporated in the Draft Plan and that strategic planning based on impact rather than kill targets of feral pigs is an integral component. Likewise, undertaking evaluation based on impact measures rather than kill targets is also essential. We also note that the use of bounties is not included in the Draft Plan. The RSPCA does not support bounties due to their ineffectiveness and associated high welfare risks (Proulx & Rodtka 2015; Wilson 2007).

The National Feral Pig Action Plan (NFPAP) will play a vital role in providing leadership, collaboration and coordination for effective and humane feral pig control and its implementation has the potential to facilitate the following:

- continued development, review and implementation of national animal welfare codes and standard operating procedures for feral pig control;
- encouragement of states/territories to regulate these standards through animal welfare legislation;
- incorporation of these standards into state/territory feral pig action plans;
- inclusion of humaneness assessments as an integral part of any commonwealth funded research into new control methods but also facilitating more research into humane and effective non-lethal methods;
- compliance of feral pig control activities conducted on commonwealth land complies with these standards, and
- incorporation of a requirement for compliance as part of conditions for commonwealth government funded projects, particularly community-based action programs.

2. Key comments

2.1 RSPCA Policy

RSPCA Australia recognises that under certain circumstances there is a need to manage wild animals, where they have adverse impacts on human activities or the environment as well as on welfare grounds. The RSPCA has a number of policies relating to wild animals, with the most relevant being [RSPCA Policy E01 Wildlife - General principles](#) and [RSPCA Policy E02 Management of wild animals](#). In our Policy E02 we state that any measures taken to manage wild animals must recognise that whether the animals are native, introduced or viewed as a 'pest' this does not affect their capacity to experience pain, suffering or distress. We believe that it is important to emphasise this and advocate for management techniques for invasive species that are humane.

2.2 Importance of animal welfare in pest animal control

2.2.1 Acknowledgement of animal welfare/humaneness

There is increasing community concern and expectations regarding the treatment of vertebrate pest animals. In the past, little scrutiny was given to the animal welfare impacts of vertebrate pest control methods. However, over the past decade, there has been an increasing number of papers published on this important issue (Littin & Mellor 2005; Littin et al 2014; Beausoleil & Mellor 2015). As a consequence, there has been a greater focus on animal welfare in management plans and strategies. The RSPCA is pleased to note that humaneness is included in the Draft Plan's mission statement. However, the RSPCA advocates that 'humaneness' be included in the following statement (on page 5), as there is an urgent need to ensure that any new methods are both humane and effective and that existing methods which are promoted are the most humane available.

Identifying, improving and promoting existing and new strategies and technologies to improve the humaneness and effectiveness of control programs;

For example, an important opportunity exists for the program to actively promote and support the use of sodium nitrite in preference to 1080. Based on experimental studies, the onset of clinical signs of 1080 poisoning for feral pigs appear to be between 2.8 and 80 hours after ingestion of the poison (Sherley 2007). Physiological signs of 1080 poisoning as described in [SOP 005 Poisoning of feral pigs with sodium fluroacetate \(1080\)](#) include:

- salivation
- jaw chomping
- vomiting (may result in sub-lethal dose leading to prolonged death over several days)
- increased lethargy
- laboured breathing (sense of breathlessness is an aversive experience)
- squealing (indicative of pain)
- manic running (risk of injury and pain)
- paralysis or convulsions
- coma and death.

Non-target poisoning is also a risk with 1080 baiting due to access to baits, vomitus and poisoned feral pig carcasses. Feral pigs baits contain 72mg 1080 per bait, which is a very high concentration, especially compared to wild dog baits, which typically contain only 6mg 1080 per bait. Thus, non-target risks are much greater due to increased access to more 1080 toxin.

2.3 Specific comments

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Under *Defining the Issue*, end of the third paragraph, it is pleasing to note that the Draft Plan mentions that recreational hunting pursuits are generally not related to population control. It should also be mentioned that some recreational hunting activities do not align with and are in fact in breach of animal welfare legislation, including the use of knives to 'stick' pigs, (rather than using a single fatal shot to the brain) and setting dogs on pigs causing extreme pain and suffering (Orr 2019).

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Under *Current Situation and Gap Analysis, Strengths of current feral pig best practice management;*

Strong suite of humane, best practice management methods available for use by land managers

The RSPCA does not believe that there is a strong suite of humane, best practice management methods currently available for feral pig control. This view is based on the relative humaneness matrix, which shows that only four of the seven control methods (have not included warfarin or CSSP as these should not be used) listed are relatively more humane (Sharp & Saunders 2011). Two methods rely on the use of 1080 which is not considered to be a humane toxin and shooting trapped feral pigs poses many welfare risks. So overall, it appears that there is only one cost-effective and relatively humane broadscale method - sodium nitrite baiting (shooting is considered humane but is labour intensive and therefore has limited application for

broadscale control). The RSPCA strongly advocates for further research to develop more humane methods and for the Draft Plan to acknowledge this and thereby discourage the use of 1080 baits.

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Case Study D Learning on Country Program - Maningrida, Northern Territory, it mentions;
...trial different trapping methods and investigate the use of various bush food baits in different areas to attract feral pigs into traps.

It is acknowledged that these types of local activities, are very important and provide valuable opportunities to gain further knowledge and understanding. However, it is essential that all field 'trials' are approved by an animal ethics committee (AEC). Relevant details aren't provided in the case study description, so it is difficult to ascertain if AEC approval has been granted for the work associated with this particular case study. Nonetheless, it is essential to ensure that all community-based studies undertaken under the auspices of the NFPAP are approved by an animal ethics committee to ensure that appropriate welfare standards are met, as well as to provide the opportunity to publish results.

Another issue of concern that this case study highlights relates to the humane killing of trapped pigs. It is essential that if trapping is to occur then pigs must be killed humanely. If this cannot be achieved using a firearm (i.e., a single fatal head shot), then other options must be considered including providing a bait station using sodium nitrite so that trapped pigs can consume toxic baits resulting in a relatively humane death. It is essential that there is transparency and accountability regarding methods used to kill trapped feral pigs.

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Under *3. Goals, Objectives and Actions*, the RSPCA is pleased that humaneness is included in
Goal 2 - Build community awareness of impacts caused by feral pigs and enhance capacity and capability of land managers to apply humane, best practice management.

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Under *Objective 1.1 Provide national leadership, governance and coordination Action 1.2.1 Ensure national consistency in humane, best practice feral pig management.*

An important outcome to be included under this action is that [national Welfare Code of Practice \(COP\)](#) and [Standard Operating Procedures \(SOPs\)](#) for feral pig control are not only updated but agreed to, adopted and implemented. It is also essential to monitor compliance with the COP and SOPs. This can also be incorporated as another performance measure (highlighted in bold) for *a) State, regional and local plans reflect the goals, objectives, codes of practice and standard operating procedures of NFPAP.*

Incorporation of agreed national welfare codes of practice and standard operating procedures for feral pig management must be explicit within the Draft Plan to demonstrate a commitment to animal welfare and to help ensure that social licence is maintained for the ongoing control of feral pigs. Without this and other recommendations to enhance animal welfare suggested by the RSPCA in this submission, it will be very difficult for the plan to deliver on this goal.

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Under *Objective 1.2 Drive collaborative, coordinated and informed approaches to feral pig management. Action 1.2.1 Ensure strategic, adaptive and humane feral pest management at a community, regional and national level.*

An essential element to achieve humane feral pest management at all three levels is to have all the national [Welfare Codes of Practice \(COPs\)](#) for all the vertebrate species regulated under animal welfare legislation in each jurisdiction. This is an important purpose of these COPs - to ensure that minimal legal standards are applied to all vertebrate pest control activities. This would be a simple and effective way to achieve consistently higher welfare standards across all jurisdictions. Strong advocacy by key national and state/territory based vertebrate pest advisory groups could achieve national adoption of these COPs. Adoption and regulation of national welfare COPs should be included as an additional outcome and performance measure under the Draft Plan.

Given that incorporating COPs into animal welfare legislation may take some time to achieve, it is recommended that an additional outcome be included in the Draft Plan for all activities under the auspices of the NFPAP and all government funded vertebrate pest animal control activities (as a condition of funding) must comply with relevant SOPs and COPs.

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Under *Objective 2.2 Strengthen land manager capacity and capability to effectively apply humane feral pig best practice management.*

Action 2.2.1 Implement national recognised and accredited training programs for feral pig best practice management.

To ensure that the accredited training programs incorporate nationally consistent animal welfare principles and practices, an outcome and performance measure indicating that nationally agreed welfare COPs and SOPs will underpin the accredited training programs.

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Under *Objective 3.1 Improve best practice feral pig management methodologies, tools and systems.*

Action 3.1.1 Ensure feral pig management resources are consistent, updated and incorporate new approaches and technologies.

It is pleasing to see that one of the outcomes is to review the existing feral pig COP and SOPs as this is very important especially as the current [SOP 001 Trapping of feral pigs](#) lacks specific details relating to the humane shooting of trapped feral pigs. There are many welfare risks associated with this activity and it is unclear in the SOP how these are managed effectively. The RSPCA recommends that this SOP be reviewed as a matter of urgency to ensure that operators are able to shoot trapped pigs humanely or that another solution is developed to achieve a humane outcome other than by shooting very distressed and crowded animals in a trap.

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Under *Objective 3.1 Improve best practice feral pig management methodologies, tools and systems.*

Action 3.1.3 Develop research, development and extension (RD&E) opportunities to inform action.

‘Humane’ should be included in Outcome e. *New humane cost-effective technologies, systems and strategies developed for land managers to suppress feral pig populations and/or quantify impacts.*

Research of new techniques must be at least, but preferably more, humane than the most humane currently available method. Humaneness is essential to ensure that community acceptance of activities under the NFPAP is maintained.

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Under *Objective 3.2 Drive collaboration, strategic and scientific approaches to best practice feral pig management to suppress, or eradicate, feral pig populations and minimise threats.*

Action 3.2.1 Support existing and implement new collaborative and coordinated feral pig management activities.

In relation to the performance measure *‘Land manager feedback on outcomes from collaborative activities operating at the local and regional scale collected by regional coordinator network using agreed templates.’*

The RSPCA recommends that the agreed template should include adherence to the feral pig welfare COP and relevant SOPs as well as the relative proportion of the most humane methods being used in comparison to overall methods being used for specific collaborative activities. This metric will assist in identifying if indeed the most humane methods are being used and to help determine what can be done to promote the use of the most humane methods where possible. This is essential to meet the NFPAP goal relating to humane best practice methods being used.

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Under *Objective 3.3 Promote adoption of best practice in management plans*

Action 3.3.1 Develop nationally minimum guidelines for feral pig management plans and templates to promote consistency at local, regional and state/territory levels.

Outcome c. Templates and supporting resources used by land managers to prepare feral pig management plans.

It is essential that compliance with national welfare COP and SOPs for feral pig control is included.

Under 4. Governance and Implementation

The membership of the Scientific Advisory Panel should be described in the Draft Plan to ensure there is adequate coverage of key skills and knowledge including a member with recognized animal welfare expertise - this person should not be directly involved in the program. This is essential to ensure that Goal 2 of the Plan is achieved.

Page 32 Glossary of terms

Under the definition of *Humane* - *The humaneness of a control method refers to the overall welfare impact that the method has on an individual animal (RSPCA 2019). Different techniques may be more or less humane depending on the species being controlled, nontarget risks, and the way in which each technique is applied.*

It is suggested to change 'Humane' is 'Humaneness' and that the definition change to 'Different techniques may vary in relative humaneness depending'

It is suggested to add the following definitions;

Sentience - the recognition of sentience particularly for invasive species helps to remind operators and others that these animals are capable of experiencing pain and suffering. Reference to sentience in the Draft Plan should also be included.

Humane killing - given that the Draft Plan relies on lethal control as the main management method, there should be reference to this in the glossary as these are integral to commitment to achieve humane outcomes. The humaneness description does not provide sufficient detail about what 'humane' is. The following description is recommended;

- when an animal is either killed instantly or rendered insensible until death ensues, without pain, suffering or distress.

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An RSPCA 2019 reference is cited in the description of 'humane' but is not listed as a reference.

Other references are cited throughout the Draft Plan but are not listed, either as footnotes or at the end of the document.

References

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Ends.