

22<sup>nd</sup> April 2021

Director  
Wildlife Trade Assessments  
Department of Agriculture, Water and the Environment  
GPO Box 858  
CANBERRA ACT 2601

Email: [wta@environment.gov.au](mailto:wta@environment.gov.au)

Dear Director

**Re: WTO Application by Wildlife Game Resources Australia - Commercial Use of Wallabies in Tasmania**

RSPCA Australia is pleased to have the opportunity to provide a submission on this proposal, which is jointly submitted with RSPCA Tasmania. The RSPCA has long advocated for the ongoing application of ethical principles in relation to macropod management including that any action needs to be justified, humane and effective (see Attachment 1 Relevant RSPCA Policies). 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 'pest' species that are humane.

The RSPCA notes that the WTO application by Wild Game Resources Australia (WGRA) presents an opportunity for some net welfare benefit, through approximately one third of the wallabies currently being shot non-commercially to be shot by commercial shooters. Under the requirements of the [National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes](#), commercial shooters must be deemed competent for shooting accuracy. This requirement is not mandatory for non-commercial shooters. Shooting competency is a key factor in ensuring a humane death.

**Specific comments**

**1. Competency of shooters**

In the WGRA application on page 12 under 5.2 *Supervision of the harvest* it states;

*All Harvesters must do a TAFE course to the regulatory Authority Australian Game Meat and Hygiene Handling Standard to supply WGRA product, they also must complete the regulators approved course with the Firearms Safety Council in their respective State or a Nationally recognised Course.*

There is no mention of the shooting competency test to be carried out. However, there is reference to approved courses for mandatory requirements for hygiene and for firearm safety. The RSPCA recommends that the application include reference to the procedure for shooter competency assessment.

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Recommended criteria for approved shooting accuracy tests are described on page 19 in the [National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes](#), as follows.

**Objective:** To shoot a five-round grouping to achieve a 75mm group or smaller within the relevant circle in the National Humane Shooting Test Target.

**Test conditions:**

- *Target:* Target with 75 millimetre (mm) diameter circle for 100 metres
- *Shooting distance to target:* 100 metres
- *Shooting position:* Seated, and with a suitable gun rest as desired by the shooter
- *Shooting platform:* Vehicle or simulated vehicle
- *Firearms:* A centre-fire rifle with a telescopic sight. Nominal bore size of < 0.204 calibre
- *Weather:* Testing must not be conducted when it is windy (> approx. 25km/h) or when visibility is poor (i.e., during rain, hail/snow, fog/mist, dust storms).

In addition, all commercial shooters should undertake a course to gain understanding and skills of aspects which underpin humane shooting principles. Such a course should, according to the [National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes](#), contain the following elements;

Elements of competency that contribute to the humane harvesting of kangaroos include:

- Understanding animal welfare principles and responsibilities
- Accurate shooting of kangaroos and wallabies
- Euthanasia of wounded or injured animals
- Use of acceptable methods for euthanasing pouch young
- Taking appropriate action to minimise the suffering of orphaned dependent young-at-foot
- Maintaining accurate harvesting records.

Supporting evidence of competency should include any of the following:

- Records of on-the-job training
- Relevant experience
- Recognised training (e.g., TAFE courses) and staff training registers
- Approved shooting accuracy tests
- Induction training
- Supervisor sign-off for specific tasks.

## 2. Monitoring compliance

In addition to the monitoring regime at the processing facility, it is essential that in-field monitoring is also conducted to ensure mandatory welfare standards are adhere to especially in relation to achieving a single head shot and complying with the standard operating procedures for humanely killing orphan joeys. The applicant should demonstrate that arrangements have been made for independent in-field monitoring of contracted commercial shooters. The compliance check should include the relevant elements listed above.

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

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Di Evans'.

Dr Di Evans  
Senior Scientific Officer  
RSPCA Australia

## Attachment 1: Relevant RSPCA Policies

### [RSPCA Policy E01 Wildlife - General principles](#)

1.1	RSPCA Australia recognises that the state of an ecosystem directly affects the diversity of populations, the likely survival of species and the welfare of individual animals within it. Consideration of wild animal welfare thus requires finding a balance between maintaining the viability of an ecosystem and protecting the welfare of individual animals.
1.2	RSPCA Australia believes that wherever human activities have the potential to have a negative impact on wild animals, whether directly or indirectly, we have a duty to ensure that they are conducted in a way that causes as little injury, suffering or distress to animals as possible.
1.4	RSPCA Australia believes that management practices utilising natural resources (such as mining and logging) must be designed to ensure that they cause as little suffering to animals or negative consequences for the viability of a given population as possible.
1.6	RSPCA Australia supports the ratification by the Australian government of international treaties, conventions and agreements which serve to protect biodiversity and promote the humane treatment of wild animals.

### [RSPCA Policy E02 Management of wild animals](#)

2.1	<p>RSPCA Australia acknowledges that in some circumstances it is necessary to manage populations of wild animals, native or introduced. There are three main reasons used to justify the management of wild animals:</p> <ul style="list-style-type: none"> <li>○ to protect the welfare of individual animals</li> <li>○ to help conserve a threatened, endangered or vulnerable native species</li> <li>○ to reduce adverse impacts on human activities or the environment.</li> </ul> <p>It is noted that in most cases these problems have arisen as a result of human activities or interventions.</p>
2.2	Any measures taken to manage wild animals must recognise that whether an animal is native, introduced or viewed as a 'pest' does not affect its capacity to experience pain, suffering or distress.
2.3	Programs and strategies which prescribe the management of wild animals (such as threat abatement plans and native animal management plans) must be justified, supported by scientific evidence and have clearly stated aims. Such programs should be subject to public consultation, ethical approval and review prior to implementation. Once implemented, the results of such

	programs should be regularly monitored, evaluated, publicly reported and used to inform future activities.
2.4	Management activities (such as on-ground intervention or control) should only be undertaken if it is likely that the aims of the program can be achieved. The methods used must be humane, target-specific and effective (see E2.10).
2.5	Once the aims of a management program have been achieved, steps must be taken to ensure that the outcomes are maintained in the long-term.
2.6	RSPCA Australia advocates the adoption and implementation of compulsory codes of practice and standard operating procedures for all wild animal management activities.  See <a href="http://www.pestsmart.org.au/animal-welfare/humane-codes">www.pestsmart.org.au/animal-welfare/humane-codes</a>
2.9	<b>Reducing adverse impacts of wild animals</b>
2.9.1	Many introduced animals, and some native animals, are viewed as ‘pests’ because of their adverse impacts on human activities, health and wellbeing or the environment. These adverse impacts include: <ul style="list-style-type: none"> <li>○ land degradation, ecosystem effects, and predation and competition with native species</li> <li>○ losses to agricultural, horticultural and forestry production, including grazing competition, damage to crops, predation on domestic animals and damage to infrastructure</li> <li>○ risks to public health and safety</li> <li>○ other human activities such as tourism, recreation and transport.</li> </ul> RSPCA Australia acknowledges that, in certain circumstances, it is necessary to manage populations of wild animals in order to reduce these impacts.
2.9.2	Management programs must be aimed at reducing adverse impacts rather than simply reducing the number of animals. RSPCA Australia is opposed to the use of incentive methods (such as bounty systems) where these focus on killing animals rather than reducing impacts.
2.9.3	Wherever possible, pest control measures should be carried out as part of an integrated pest animal management program in consultation with the relevant government agency. Lethal methods must only be used where there is no non-lethal, humane alternative available that is effective at achieving the program’s aims.
2.10	<b>Management and control methods</b>
2.10.1	RSPCA Australia is opposed to the use of inhumane methods of controlling or managing wild animals. A totally humane method is one which does not cause any pain, suffering or distress to target and non-target animals.  See also <a href="#">Policy G1 Humane killing</a>
2.10.2	When determining the method of control, the most humane method that will effectively achieve the aims of the management program must be used.

2.10.3	The humaneness of a given control method is influenced by its application and the skill of the operator. Control methods must be applied in the best possible way by trained and competent operators.
2.10.4	<p>RSPCA Australia supports the independent assessment of the relative humaneness of control methods and the publication of these assessments to assist in identifying the most humane available methods for a given situation.</p> <p>See Sharp T and Saunders G (2008). <a href="#">A model for assessing the relative humaneness of pest animal control methods</a>. Australian Government Department of Agriculture, Fisheries and Forestry, Canberra, ACT</p>
2.10.5	RSPCA Australia believes there is a continuing need to improve current control methods or replace them with more humane and effective alternatives. The RSPCA supports research and development of humane alternatives, including the replacement of lethal methods with humane and effective non-lethal methods, such as reproductive control.