RSPCA AUSTRALIA, RSPCA TASMANIA, RSPCA VICTORIA, RSPCA SOUTH AUSTRALIA

JOINT SUBMISSION

DRAFT NATIONAL FERAL DEER ACTION PLAN

20th March 2023

1. Introduction

The RSPCA is pleased that a draft National Feral Deer Action Plan (the Plan) has been developed and welcomes the opportunity to provide comments. This submission has been prepared jointly with RSPCA Tasmania, RSPCA Victoria and RSPCA South Australia.

1.1. RSPCA Policies

The RSPCA recognises that under certain circumstances there is a need to control vertebrate pest species, including feral deer. The RSPCA has a number of policies relating to vertebrate pest control, with the most relevant being RSPCA Policy E01 Wildlife - General principles and RSPCA Policy E02 Management of wild animals. The full wording of these policies is provided in **Appendix A**. Key aspects include ensuring that:

- Programs and strategies which prescribe the management of wild animals (such as threat abatement plans and native animal management plans) are 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.
- A balance is found between maintaining the viability of an ecosystem and protecting the welfare of individual animals.
- Where human activities have the potential to have a negative impact on wild animals, whether directly or indirectly, that they are conducted in a way that causes as little injury, suffering or distress to animals as possible.
- Management programs are 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.
- The humaneness of current control methods is improved or they are replaced with more humane and effective alternatives.
- There is adoption and implementation of compulsory codes of practice and standard operating procedures for all wild animal management activities
- All activities to control vertebrate pests are:
    - justified - impact must be legitimate, quantified and appropriately measured to assess progress; benefits must outweigh the harms
    - effective - only proven control methods to be used based on scientific evidence and that ongoing control is achieved, and
    - humane – that it is recognised that pest species are sentient, and that the most humane methods are used.

1.2 Humane Vertebrate Pest Control

There is increasing community concern and expectations regarding the treatment of animals considered as pests. In the past, little scrutiny was given to the animal welfare impacts of control methods, but over the past decade, there has been a greater focus on animal welfare in management plans and strategies. However, unless this translates into improved practices on the ground, progress will not be achieved. More needs to be done especially in relation to humaneness of control methods, competency of operators and research into more humane management options.

RSPCA Australia supports the eight principles derived from A National Approach to Humane Vertebrate Pest Control workshop held in 2003, jointly hosted by RSPCA Australia, the Animal Welfare Science Centre and the Vertebrate Pest Committee (HVPC Working Group, 2004). These principles provide a logical pathway by commencing with important ethical considerations regarding justification and likelihood of success of pest animal control, then leading into humaneness aspects of methods to be used, evaluation, ongoing maintenance and concluding with a commitment for continuous improvement. These principles are quite comprehensive and should therefore provide a robust framework in terms of meeting animal welfare requirements.

Key Principles

1) The aims or benefits and the harms of each control program must be clear; control should only be undertaken if the benefits outweigh the harms.
2) Control should only be undertaken if there is a likelihood that the aims can be achieved.
3) The methods that most effectively and feasibly achieve the aims of the control program must be used.
4) Whether or not each control program actually achieved its aim must be assessed.
5) Once the desired aims or benefits have been achieved, steps must be taken to maintain the beneficial state.
6) The most humane methods that will achieve the control program's aims must be used (this requires an assessment of the humaneness of all existing methods).
7) The methods must be applied in the best possible way.
8) There should be research to reduce the negative animal welfare impacts of existing control methods and to develop novel methods that cause less pain and distress.

The National Feral Deer Action Plan can assist in achieving consistency, particularly in relation to assessing impact reduction and that activities are carried out in accordance with high welfare standards.

We acknowledge that feral deer numbers have increased in specific areas across Australia and are causing environmental/ecological/cultural asset damage as well as posing a risk to human safety. Therefore, where evidence is clear, management including humane lethal control methods may be

justified. However, the RSPCA advocates that investment in effective and humane non-lethal methods is pursued.

We also acknowledge that feral deer are shot by recreational hunters in some jurisdictions and that this may hinder efforts to control numbers to a level that will mitigate negative impacts. The RSPCA opposes recreational hunting due to the inherent and inevitable pain and suffering caused.

For feral deer control there is heavy reliance on shooting. It is recognised that eradication of feral deer is not possible on mainland Australia but local population reduction to minimise adverse impacts may be achievable. However, in general, continued reliance on shooting is unlikely to be sustainable or cost effective. There is an urgent need to investigate more effective, humane and sustainable non-lethal methods.

2. The Plan - General comments

It is pleasing to note that social license and humaneness are mentioned throughout the Plan, although more focus is encouraged. Maintaining social license is imperative and relies upon demonstration of significant impacts caused by feral deer, ensuring good governance and transparency, negligible impacts of management activities on non-target species, that management methods are effective in reducing negative impacts and that on-the-ground activities are humane.

The Plan provides a useful framework for all stakeholders but does not identify opportunities or discuss limitations relating to ongoing funding which is essential for the Plan to be implemented. This is a significant challenge for those jurisdictions which have less infrastructure, challenges accessing wilderness areas or incumbent legislation. In addition, the Plan does not mention potential synergies with other feral animal control programs (such as wild horses etc), which is an important consideration in terms of natural and cultural asset protection and the cost-effective use of resources.

Inconsistency regarding the status of deer is problematic where on one hand an important goal is to maintain populations for recreational hunting whilst on the other hand, efforts are focused on reducing impacts as much as possible. There are concerns that where deer remain a protected game species, this situation may undermine control efforts, resulting in less cost-effective management and more deer having to be killed in the medium to long term.

Although the Plan mentions the welfare code of practice and standard operating procedures, these are voluntary and therefore lack rigour in terms of compliance. To meet community expectations, welfare standards must be regulated and monitored effectively to ensure compliance.

The Plan also lacks sufficient emphasis on the importance and how to best measure impact mitigation following the implementation of control measures. This is critical in terms of providing an effective tool to identify deficiencies in management program to enable continuous improvement.

The concept of buffer zones appears to have some merit but it is difficult to understand how these will work effectively on-the-ground. It would be helpful if the Plan provided more details about how the boundaries will work in relation to management activities.

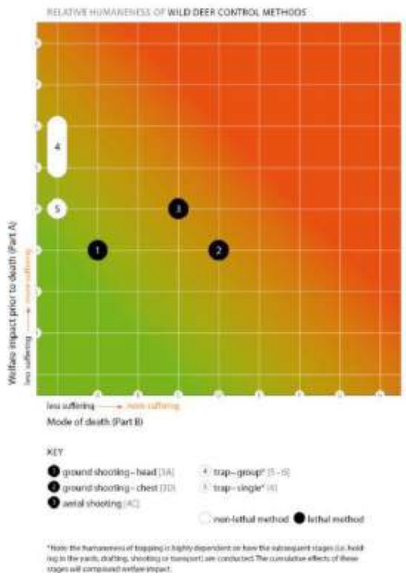
2.1 Control methods

2.1.1 Shooting

Shooting should only be used in a strategic manner as part of a coordinated program designed to achieve sustained effective control. Ground shooting is the only currently available method for controlling deer and a best practice approach is set out in the standard operating procedure DEE001 Ground shooting of feral deer. If the correct firearm and ammunition are used, a well-placed head shot (with the brain as the point of aim) will result in immediate unconsciousness. When there is adequate damage to the brain and the animal does not regain consciousness there will be no suffering. In contrast, with chest shots (which cause damage to the heart and lungs) the time to unconsciousness can range from seconds up to a few minutes. When an animal is shot in the chest, the time to loss of consciousness and the time to death will depend on which tissues are damaged and, in particular, on the rate of blood loss and hence how long it takes for the brain to have insufficient oxygen. Loss of consciousness and death is likely to be quicker when animals have been shot in the heart compared to the lungs. A phenomenon called 'hydrostatic shock', where a pressure wave from the bullet causes damage to internal organs, can contribute to 'bringing down an animal' quicker and causing a more rapid loss of consciousness in some instances when animals are shot in the chest. However, compared with head shot animals, those who are chest shot have a higher risk of remaining conscious and suffering for a short period prior to death - though the extent of suffering will vary depending on which tissues are damaged and the rate of blood loss. During severe bleeding they are likely to feel a sense of breathlessness and potentially some anxiety and confusion before they lose consciousness. Head shooting should be carried out at all times unless it is not possible in exceptional circumstances or where it is necessary on welfare grounds to use a chest shot.

Relative humaneness matrix

In terms of animal welfare, the Humaneness Assessment Model (Sharp & Saunders, 2011) developed by the NSW Department of Primary Industries is an essential tool for pest animal management, as it helps decision makers to choose the most humane methods currently available. It assesses and ranks pest control methods based on the welfare impact prior to death and the effectiveness to achieve a humane death - instant loss of consciousness and rapid death without consciousness being regained (Sharp and Saunders, 2011).



Source: Feral / wild deer control methods humaneness matrix - PestSmart

In terms of aerial shooting, reliance upon lack of movement as confirmation of death from a helicopter is of concern, as assessment of signs including absence of breathing, pulse, palpebral reflex and jaw tone cannot be checked during aerial shooting. It is noted that Hampton et al (2022) reported that the best animal welfare outcomes were achieved when helicopter-based shooting operations followed a fly-back procedure and mandated that multiple shots were fired into each animal. These authors also reported use of shotguns in aerial shooting of feral deer but did not collect relevant animal welfare data on deer who were shot with a shotgun. The RSPCA is concerned about the use of shotguns for aerial shooting and urges that appropriate evidence is obtained to demonstrate that welfare outcomes are acceptable.

In the Plan the use of thermal imagery is stated as improving animal welfare outcomes but these must be formally evaluated and reported. It would be useful if fundamental welfare parameters could be built-in to on-the-ground operations to help expand knowledge and understanding of the use of these enhancement tools.

Use of silencers may also offer potential welfare benefits but these must also be assessed to confirm this as well as the implications of their use in terms of firearm control must be considered.

The RSPCA therefore believes shooting of feral deer should only be performed by skilled operators who have the necessary experience with firearms and who hold the appropriate licences and accreditation.

2.1.2 Trapping and shooting

Trapping flighty animals such as feral deer can lead to significant animal welfare risks. Although the National SOP Trapping of feral and wild deer identifies high risks causing significant suffering and distress including capture myopathy and facial, leg, and antler injuries, no studies have been undertaken to quantify these impacts. It is essential that comprehensive humaneness assessments are done for trapping of target and non-target species before being considered acceptable in terms of animal welfare. Furthermore, there are concerns that despite advice included in the SOP to minimise panic and distress whilst trapped deer are shot, there is insufficient evidence provided that these measures mitigate suffering to an acceptable level. The measures which are recommended should be mandatory if it is shown that adverse welfare outcomes are avoided.

2.1.3 Toxic baits

The Plan promotes trials to develop toxic baits under strict directions to protect humans, domestic animals, wildlife, and the welfare of target species. It is imperative that inhumane toxins are not considered as potential candidates for this work, in particular 1080, which is heavily relied upon for control of other pest species. The RSPCA has advocated for many years for more humane alternatives to be developed to replace the use of 1080.

2.1.4 Non-lethal methods

The Plan mentions non-lethal methods including deterrents, exclusion fencing and fertility control. Although it is recognised that target species can become habituated to some deterrents and that these only move deer to another location, these may play a potential role in protecting human safety in peri-urban areas etc.

Exclusion fencing can be effective for discrete locations but very limited research has been undertaken regarding animal welfare risks which include denying access to water, entrapment, injuries resulting in death etc. There is an urgent need for research to assess the welfare impacts of exclusion fencing on both target and non-target species.

Fertility control may be an option for specific areas where shooting is not an option due to human safety risks (e.g. peri-urban areas) or in discrete locations that have key assets. Achieving a population at a level which does not pose a threat may be of value.

2.2 Commercial harvesting

The encouragement of commercially harvesting deer should proceed with caution as there are likely to be conflicting goals in relation to deer management and profitability. Shifting a declared pest to an asset may be viewed as having some benefits but this may also create competing objectives, especially if heavy investment in infrastructure, creation of markets and skilling of workers has occurred. Thorough consideration of potential long term consequences needs to be undertaken before commercial harvesting is promoted as an adjunct to achieve effective deer control.

2.3 Hunting

The RSPCA opposes recreational hunting, or the act of stalking or pursuing an animal and then killing it for sport, due to the inherent and inevitable pain and suffering caused. Negative animal welfare impacts associated with recreational hunting, particularly injuries, are recognised and reported (Hampton & Hyndman 2018).

It is known that chest shooting is often preferred to head shooting by hunters so as to preserve the head and antlers for trophy display. Thus, including hunters in control programs creates a conflict in terms of ensuring the most humane method for killing deer is used. Ground shooting by professional, trained and competent shooters is considered to be the most effective and humane technique currently available for reducing wild deer populations.

Recreational hunting can involve more than just ‘shooting’. Hunted animals are often chased long distances, sometimes by dogs as well as people; other parts of the body are aimed at rather than the head; wounded animals escape without being followed up and dependent young are often left to fend for themselves. The skill level of hunters is highly variable, and some are not motivated or required to follow standard procedures or best practice. The consequences of these practices are that many animals will endure significant suffering and a protracted death.

Some hunters use a bow and arrow to hunt animals because they consider it to be an ‘art’ or challenge that requires skill and patience. However, from an animal welfare perspective it results in significant pain and suffering. Wounding rates can be high, the time to death can be prolonged and animals remain conscious while they die from massive blood loss.

Bow hunters use either a longbow, recurve bow or compound bow with a broad-head arrow to kill animals. Compound bows are most commonly used as the system of wheels and cables along with sights, makes them easier to fire. Crossbows are prohibited weapons in most states

and are not permitted for hunting. However, they can be used when hunting deer in Victoria as long as hunters hold the relevant government approval.

The same game species permitted to be hunted with a firearm can also be bow-hunted (i.e. deer, feral pigs, feral goats, foxes, feral cats, wild dogs, rabbits and hares as well as game birds). The arrow is aimed at the chest to cause damage to the heart and lungs. Head shots are never used since deflection of the arrow is likely to occur from striking skull bones.

Bow hunting is effectively prohibited in Tasmania and is regulated in NSW (by the Department of Primary Industries) and Victoria (by the Department of Environment and Primary Industries) but there are no specific bow hunting regulations in other states and territories.

The number of animals wounded (but not killed) by bow hunting is variable but can be very high. For example, with deer hunting, surveys of bow hunters indicate that between 12% and 48% of deer may escape whilst injured (Gregory 2005). This is significantly higher than the reported 5% of wounded animals that escape when shot with a rifle by professional shooters. Wounded animals that are not retrieved and killed can suffer from the disabling effects of the injury, pain and wound infection.

When using a bow, hunters need to get very close (no more than 20 metres) to the target animal. The arrow's flight path to the chest must be unobscured by leaves or branches or it might be deflected and hit another part of the body. It can also be difficult to follow and kill mobile injured animals if they escape into thick cover, rough terrain or other inaccessible areas. Furthermore, with animals who are injured and have gone down, it can be hard to get another shot into the chest with an arrow, depending on the position the animal is lying.

The Plan should specify that bow hunting is not considered an acceptable form of culling feral deer.

In addition to compromised welfare, hunting poses risks regarding the potential dispersal of feral deer, especially where dogs are used, in relation to spread of significant diseases. Deer can harbour and transfer several important diseases to cattle and horses including exotic diseases. Endemic diseases of importance include Johne's disease, anthrax, bluetongue, brucellosis, and bovine viral diarrhoea. Exotic diseases include foot and mouth disease, rabies and spongiform encephalopathies. It is unclear if regulations exist to prohibit recreational hunting should an exotic disease outbreak occur to prevent disease transmission through fomites, deer body parts and/or deer dispersal.

3. The Plan - Specific comments

Page 17, Figure 7 appears to have omitted the large population area for Tasmania.

Page 21, 1.3 Under Performance Measures, suggest adding adoption of SOPs and uptake of government supervised &/or funded activities to require compliance with SOPs.

Page 21, 1.5 Pleased to note that animal welfare is highlighted for both target and non-target animals. It is also encouraging to note that the CoP and SOPs will be updated by 2024 but it is

imperative that these are regulated or at least adopted formally. Without this, these are merely documents without any evidence that control measures are meeting welfare requirements.

Page 22, 1.8 Fully support efforts to accredit volunteer shooters (including landholders) or professional shooters in coordinated programs. This is very important in terms of maintaining social license. Operator competency is one of the most important factors influencing animal welfare.

Page 24, 3.2 Support PM 3 to demonstrate reduced impacts in priority areas.

TABLE 3: Comparison of control tools for feral deer in Australia

Page 29, CONTROL TOOL: Aerial Shooting - Humaneness column – last dot point - a note of caution regarding that aerial views can confirm outcome of each shot. Lack of movement is not confirmation of death. We acknowledge the work of Hampton et al (2021) recommending that all aerial operations include a flyback for additional shots to be delivered to the head/chest but this must be done immediately after the first shot is delivered. For hit deer who are recumbent, wherever possible, a fatal head shot should be delivered to achieve a rapid death.

Page 30 – CONTROL TOOL: Drones fitted with thermal camera - statement that Practitioners report that drones do not generally scare feral deer or other animals. Suggest that evidence is provided to support this statement.

Page 31 - CONTROL TOOL: Ground culling by professional shooters. Under Limitations – add no requirement for competency assessments – this should be addressed, e.g. mandatory compliance with SOP.
CONTROL TOOL: Ground culling by volunteer pest controllers; Under Limitations – add no requirement for competency assessments – this should be addressed, e.g. mandatory compliance with SOP.
CONTROL TOOL: Ground culling by volunteer pest controllers; Under Limitations – add no requirement for competency assessments – this should be addressed, e.g. mandatory compliance with SOP.
CONTROL TOOL: Ground culling by land managers; Under Limitations – add no requirement for competency assessments – this should be addressed, e.g. mandatory compliance with SOP.
CONTROL TOOL: Commercial harvesting (shooting); Under Humaneness – statement that Professional harvesters are generally experienced to make sure culls are humane is not founded; there needs to be evidence to support this statement.
Spelling error: Competency assessments are required by some processing companies to maximise humaneness outcomes

Page 32: CONTROL TOOL: Trapping - Under Humaneness - Humaneness assessments would contribute to a future national SOP; this is noted as being essential.
CONTROL TOOL: Chemical sterilisation treatments have not successfully reduced populations of feral deer, anywhere in Australia; Suggest including relevant references to support this statement.
CONTROL TOOL: Exclusion fencing – Under Humaneness, suggest adding humaneness assessment of target and non-target species is required.

P37 Table 6
GOAL 1: Contain large populations and reduce their impacts
Effectiveness of potential toxic baits (and registration of one or more) and delivery mechanisms suggest including humaneness as well as effectiveness; also need to assess non-target impacts
Suggest adding Cost effective Impact evaluation techniques as a medium priority as this is essential to determine effectiveness of activities.

Page 38: Tone and approach of messages
Pleased to see the following: *Raise the profile of feral deer issues and threats, without demonising or glorifying deer.*

Page 40 Spelling error: Sharp, T., Saunders, G., (2011). A model for assessing the relative humaness of pest animal control methods (Second edition). Australian Government Department of Agriculture, Fisheries and Forestry, Canberra, ACT.

It is also noted that the National Feral Deer Action Plan Implementation Committee (NFDAPIC) does not include someone with animal welfare expertise. Given the importance of animal welfare, the RSPCA believes rectifying this would greatly assist the implementation of the Plan.

References:

Gregory NG (2005) Bowhunting deer. Animal Welfare 14:111-116.

Hampton JO & Hyndman TH (2018) Underaddressed animal-welfare issues in conservation. Conservation Biology 33(4):803-811.

Hampton J, Bengsen A, Pople A, et al (2022). Animal welfare outcomes of helicopter based shooting of deer in Australia. Wildlife Research, 49:264-273.

Sharp T & Saunders G (2011). A model for assessing the relative humaneness of pest animal control methods (Second edition). Australian Government Department of Agriculture, Fisheries and Forestry, Canberra, ACT.

Appendix A - RSPCA policies

RSPCA Policy E01 Wildlife – General principles (adopted 06/12/10)

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.

1.3 RSPCA Australia supports the use of independent environmental impact assessments to determine the potential of any development to threaten the continued survival of a species, significantly alter existing ecosystems, or have a negative impact on animal welfare. Where development projects identify threats to the welfare of wild animals, conditions must be placed on the development to mitigate these threats. Where mitigation is not possible or reasonable the development should not go ahead.

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.

1.5 RSPCA Australia supports the establishment and maintenance of national parks and conservation zones in areas of environmental significance to preserve genetic diversity, promote biodiversity and protect native animals from human impacts. The use of such areas should only permit activities that do not compromise animal welfare. At the same time, RSPCA Australia recognises that these areas alone are not sufficient for the conservation of biodiversity.

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 (adopted 06/12/10)

2.1 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*:

- to protect the welfare of individual animals
- to help conserve a threatened, endangered or vulnerable native species
- to reduce adverse impacts on human activities or the environment.

* It is noted that in most cases these problems have arisen as a result of human activities or interventions.

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 www.dpi.nsw.gov.au/agriculture/pests-weeds/vertebrate-pests/codes/humane-pest-animal-control

2.7 **Protecting the welfare of wild animals**

2.7.1 Management programs aimed at protecting the welfare of individual animals or populations may be necessary where populations are subjected to severe environmental stress, habitat fragmentation, disease or human activity. Such programs must only be carried out under the supervision of the relevant government agency.

2.7.2 In some circumstances it is considered necessary to reduce the size of a given population of wild animals for the long-term benefit of that population. The killing of animals for this reason should only be permitted where it can be carried out humanely and there is no non-lethal, humane and effective alternative available (see E2.10).

See E3 Rescue and rehabilitation of wild animals

2.8 **Conserving native species**

2.8.1 Management programs aimed at conserving native animals, including threatened, endangered or vulnerable species centre on habitat protection, but include strategies such as captive breeding, translocation and release of animals. Care must be taken to minimise any adverse effects of these activities on the welfare of both target and non-target animals. Such programs must only be carried out under the supervision of the relevant government agency.

2.9 **Reducing adverse impacts of wild animals**

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:

- land degradation, ecosystem effects, and predation and competition with native species

- losses to agricultural, horticultural and forestry production, including grazing competition, damage to crops, predation on domestic animals and damage to infrastructure
- risks to public health and safety
- other human activities such as tourism, recreation and transport.

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 **Management and control methods**

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 Policy G1 Humane killing

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 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.

See Sharp T and Saunders G (2008). A model for assessing the relative humaneness of pest animal control methods. Australian Government Department of Agriculture, Fisheries and Forestry, Canberra, ACT

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.