



PROPOSED CHANGES TO LICENCES FOR KEEPING NON-NATIVE ANIMALS and PROPOSED AMENDMENTS TO THE PEST PLANTS AND ANIMALS DECLARATION

Submission by the Animal Protectors Alliance

Support with reservations

The Animal Protector Alliance supports the proposed changes to the extent that they are, essentially, about preventing the abandonment of animals. Releasing an animal that is not native to a local ecosystem into that ecosystem will almost always result in animal suffering. Either the released animal will be unable to survive, or it might survive (and procreate) at the expense of local native animals or other aspects of the ecosystem that provide the life support systems for local native animals.

A further reason for taking measures to prevent the escape or release of animals into the wild is that *prevention is better than cure*, especially when (as in the ACT and throughout Australia) the ‘cure’ is invariably both cruel and counterproductive.

Other than fertility control (which is hardly ever used in Australia), measures to manage unwanted animals after they have been released into the wild are invariably cruel because they involves killing animals (itself a cruelty, even if it were painless), and usually killing them in extremely cruel ways, for example, 1080 poison, Pindone poison, trapping (which causes panic and injury), shooting (which rarely causes immediate death), burying alive, or denying them access to food, water or shelter.

This ‘cure’ is inherently counterproductive because sustained killing programs, when eradication is impossible, in fact, maintain a younger, healthier, more fertile and therefore larger population of the unwanted animal than if they were left alone to establish natural regimes of territory and sexual dominance.

Reservations

Our concern with the proposal to add animals to the lists that require licensing is to ensure that no individual animal suffers or dies as a result of their inclusion in this list.

Specifically:

- What if a keeper of one of more of these animals cannot be bothered paying for a licence, so they release the animal into the wild simply to be rid of the problem?
- What happens to the animal/s if a keeper cannot be bothered paying for a licence, continues to keep the animal/s anyway, and the breach somehow comes to the attention of the government?



- A keeper of such an animal may not trust the government not to seize and kill the animal rather than automatically issuing a licence, so they decline to apply for a licence. What then happens to the animal if the breach comes to the attention of the government?
- What happens to these ‘pest’ animals if they do escape, or are abandoned into the wild? Will they be subjected to the same excessive cruelty to which declared ‘pest’ animals are routinely subjected?

We are especially concerned to ensure that any declared ‘pest’ animal that has been born in captivity, or rescued and raised as a companion animal since babyhood, who has been rendered infertile, and has no opportunity of ever escaping to the wild, or surviving there if it did escape, will enjoy the same protections as any other companion animal under the ACT Animal Welfare Act 1992.

We are concerned to make sure that these changes always operate for the protection of the individual ‘pest’ animals and the biodiversity of the natural environment, and not just another avenue for raising revenue from licensing.

Thank you for the opportunity to comment on these changes.

Frankie Seymour
On behalf of the Animal Protectors Alliance