

31st October, 2023

Natural Resources Commission

Email: nrc@nrc.nsw.gov.au

RE: NSW Invasive Species Management Review

Animal Care Australia (ACA) is a national incorporated association established to consult with government in advocating for real animal welfare by those who keep, breed and care for animals. Our goal is to promote and encourage high standards in all interactions with the animals in our care.

As a nationally recognised animal welfare organisation most of the reforms outlined within the discussion paper remain outside of our purview, however, we provide feedback relevant to animal welfare; to pets and companion animals and the correlation to invasive species.

Animal Care Australia recommends consideration is given to regular review of the species lists with a focus on ensuring animals able to be kept in captivity are done so legally and not released, in addition to the following recommendations:

- **Animal Care Australia recommends the creation of a new committee, similar to the Non-indigenous Animals Advisory Committee (NIACC) and welcomes the opportunity to advise on suitable members.**
- **Implement a clear definition that excludes pets as pests until they are no longer under an owners care AND are having an environmental impact.**
- **Education on responsible pet ownership is needed to develop a greater understanding of the impacts invasive species have.**
- **Government needs to monitor invasive species and develop achievable management plans rather than relying on quick cost effective – short-term measures.**

Animal Care Australia feels it is important Animal Welfare be acknowledged and high standards legislated within the Biosecurity Act 2015.

Animal Care Australia thanks The Natural Resources Commission for this opportunity and we welcome any questions you may have as you continue to finalise the outcomes of this review.

This submission can be publicly listed.

Kind regards,



Michael Donnelly
President
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About Animal Care Australia

As a nationally recognised animal welfare organisation, Animal Care Australia encourages continued development of animal welfare standards and Codes of Practice for animal husbandry, breeding, training, sale, and sporting exhibitions for a wide range of animal species, including pets, animals used for educational or entertainment purposes or kept for conservation, and in particular native birds, reptiles, and mammals.

Animal Care Australia was founded in early 2018 to establish an organisation run solely by volunteers to lobby for real animal welfare. With extreme animal rights and animal liberationist ideologies influencing government legislation, regulation, and policy at our expense and to the detriment of our animals and pets, it has become necessary to provide government with a balancing voice.

By uniting the broad spectrum of animal groups, collectively we offer an experienced, sensible approach to animal welfare. We estimate our foundation Animal Care Australia's member clubs currently represent well over 150,000 members and that is just in NSW alone!

By educating our members and the public about the importance of treating animals with kindness and respect for their needs and promoting the humane treatment of animals to improve animal welfare outcomes, Animal Care Australia is in the unique position of lobbying and advocating for all animals within our care.

Animal Care Australia provides priority to the following:

- lobbying government for stronger welfare outcomes
- lobbying government to increase education of the public in animal welfare and best care techniques
- educate the public on handling their animals with kindness & respect and the importance of their needs
- educate the public in the differences between animal welfare and animal rights

NSW Invasive Species Management Review



Animal Care Australia submission

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ACA Background

Animal Care Australia Inc. (ACA) represents the interests of all hobbyist and pet animal keepers nationally. Our members are comprised of most major animal keeping representative bodies including those representing dogs, cats, birds, horses, small mammals, reptiles, fish and exhibited animals. Some individual members also work in the rescue, care, and rehabilitation sectors.

Supporting statement

As a nationally recognised animal welfare organisation most of the reforms outlined within the discussion paper remain outside of our purview, however, we provide feedback relevant to animal welfare; to pets and companion animals and the correlation to invasive species.

There are almost twenty-nine million pets in Australia today - more than the estimated human population of twenty-five million. Three in five Australian households - or 5.9 million in total - have a pet. Sixty-nine percent of Australian households have a pet today.¹ Attempts to restrict the keeping of animals (indigenous or non- indigenous) is simply unrealistic and unjustified.

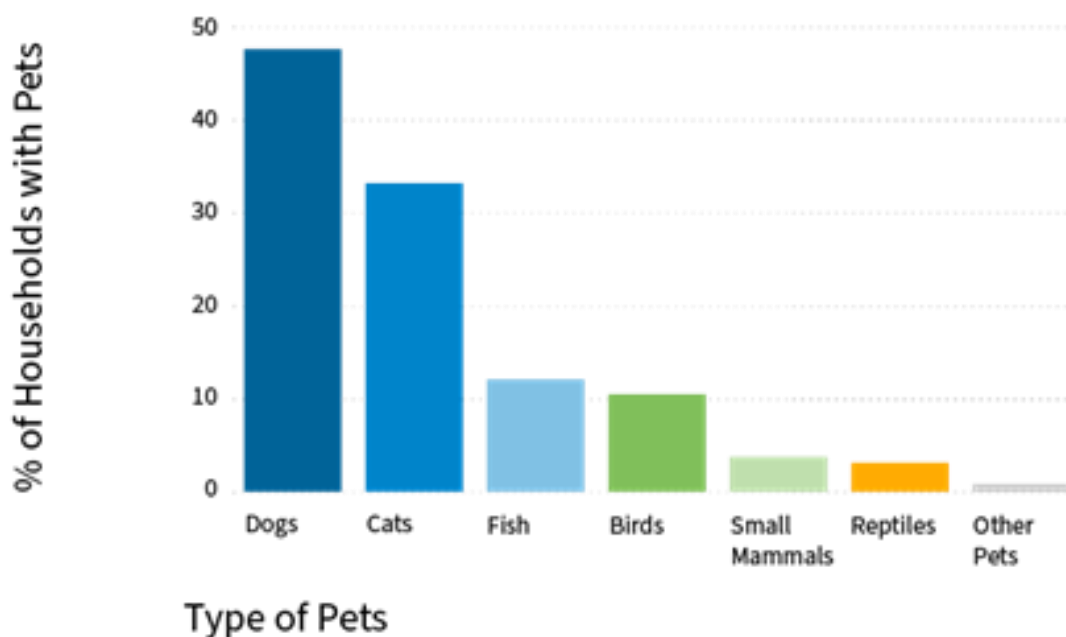


Figure 1. Percentage of households with pets by pet type. Small mammals include rabbits, guinea pigs, ferrets, and mice. Reptiles include snakes, turtles, tortoises, lizards, frogs, and salamanders.

¹ [Pets in Australia](#)

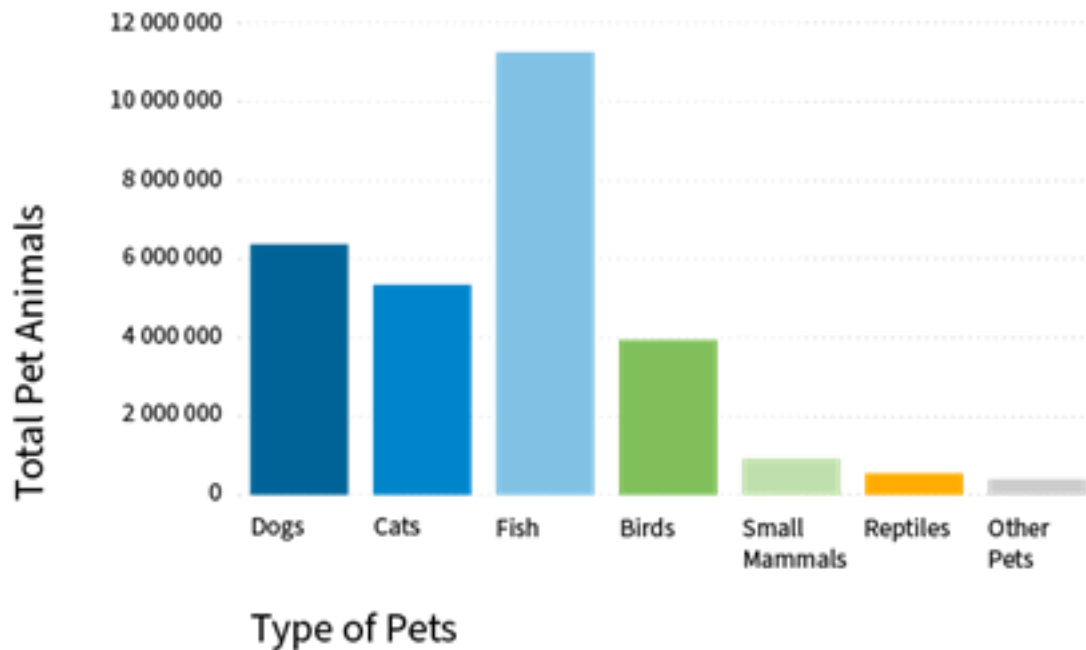


Figure 2. Number of total pet animals by pet type. Small mammals include rabbits, guinea pigs, ferrets, and mice. Reptiles include snakes, turtles, tortoises, lizards, frogs and salamander.

Animal Care Australia STRONGLY recommends the inclusion of an exception be included within the definition of ‘pest,’ that:

“Animals kept in captivity are not determined to be pests until an animal is out of human control and can then be determined to be a pest if that species is potentially damaging to the environment, regardless of the species.”

The Act:

Biodiversity Act 2015 (Act)

Species schedules within the Act:

- Currently there is a push to label all non-indigenous species kept in captivity as pests and invasive species. The lists in Schedule 3 of the Act² do not reflect the risk well, particularly for avian species.
- Schedule 3, Part 2, Division 1 lists all species where dealings are prohibited, and in addition these species are classified as pests. The purpose of this list and its maintenance within the Act is unclear – it can never hope to include all species unknown within Australia.
- Schedule 3, Part 2, Division 2 lists species where dealing is permitted, and these species are not declared by the Act to be pests. There are clearly species on this list that are indeed pests, Cane Toad (*Rhinella marina*), common Myna (*Acridotheres tristis*), for example. The list also includes, what is (or was) intended to reflect all species known to be in captivity in NSW. There are errors.
- Schedule 3, Part 3 is (or was) a list of species known to be held by exhibitors (mainly zoos) and dealings outside of permitted exhibitors is prohibited. All these species are classified as pests. Some listed species are in private collections and have been for many decades. The list is not accurate.

All non-indigenous avian species in Australian aviculture are captive bred over numerous generations. Occasionally, these birds have been escaping despite our best efforts and no species has established, with the questionable (evidence of this is yet to be provided and supported) exception of the Indian Ringneck (*Psittacula krameria*).

Non-indigenous avian species established in NSW are the result of deliberate release of wild birds, for example, sparrows, gold finches, starlings, Indian mynas, etc. All were deliberately released wild birds. Animal Care Australia welcomes the opportunity to support this assertion with evidence.

Animal Care Australia questions the wisdom of the lists in Schedule 3. We recommend consideration is given to regular review of the lists with a focus on ensuring animals able to be kept in captivity are done so legally and not released. Determining the species present and not present in Australia is the role of the federal government, as they protect our borders.

Animal Care Australia recommends the creation of a new committee, similar to the Non-indigenous Animals Advisory Committee (NIACC) and welcomes the opportunity to advise on suitable members.

² [Schedule 3](#)

This is particularly critical as the lists and their role within Schedule 3 need to be reviewed, re-considered, and then maintained.

Key review questions

The Premier of NSW has tasked the Natural Resources Commission to review the risks and impacts of invasive species in NSW, including the effectiveness of current management strategies.

1. To what extent are the NSW environment, industries and communities currently impacted by invasive species?
2. To what extent do you think existing programs in NSW are effectively managing invasive species?
3. What, if any, are the key barriers to effective management of invasive species?
4. How has invasive species management changed since the introduction of the NSW Biosecurity Act 2015 legislation and associated programs and plans?
5. What are the future risks posed by invasive species to the NSW environment, industries, and communities?
6. What opportunities do you see to improve the outcomes of invasive species management in the future?

Responses to the Key Questions:

1. To what extent are the NSW environment, industries and communities currently impacted by invasive species?

Animal Care Australia acknowledges there are considerable impacts on the environment, and we will leave those to other organisations that have greater experience in that field to provide comment.

Animal Care Australia is of the opinion that the impacts on industry are exaggerated and no longer fully supported by science or data to justify the level of influence afforded to the farming industry in particular and to a lesser extent the remainder of the agriculture industry.

Invasive species impact different aspects of the community, however for the purpose of this submission Animal Care Australia will restrict its response to impacts on the pet keeping community.

Clearly certain predatory species have impacts on pets more so than others. Foxes and feral dogs/cats will predate on hobbyists that keep poultry and small mammals kept outdoors. Although the appropriate housing for these species considerably minimises their impact.

The Indian Mynah or Common Mynah (*Acridotheres tristis*) along with the Australian native Noisy Miner (*Manorina melanocephala*) both impact aviculturists. Land clearing has provided a stronger

environmental spread of the Noisy Miner into suburban/metropolitan areas and their aggressive behaviour towards smaller bird species results in the losses of aviary birds.

Free-roaming cats also impact aviculture – be that domestic pet and feral - and the failure of the NSW Government to implement appropriate forms of cat containment has continued to see this issue intensified.

The use of biological control on small mammals, currently rabbits, directly affects the pet (domestic) rabbit keeping community. The irresponsible insistence to release rabbit control viruses prior to providing an effective vaccine has resulted in the infliction of extreme suffering and loss of thousands of pet rabbits – completely unnecessary. This could include the pending immuno-contraceptive of mice and the potential impacts this will have on our native rodents and species that predate on mice.

2. To what extent do you think existing programs in NSW are effectively managing invasive species?

Animal Care Australia does not believe invasive species are being effectively managed. Effective management does not include utilising the cheapest, or easiest forms of species control. Effective management MUST include greater research and funding into alternative methods in order to also protect the environment, animals, and communities. Neglecting animals and then culling them when our neglect fails to magically improve things is NOT management.

Varroa mite being a recent, and significant example of the failings of our current management process (bees are a captive species under our Insect Species Group)

Effective management MUST include the availability of vaccines to counter-act the use of biological controls and poisons. The authorities have completely failed at this resulting in unnecessary suffering to a variety of pets, including dogs, cats, and pet rabbits.

The existing programs in NSW to effectively manage cats is largely the same methods as foxes including trapping and survey/monitor. There are no specific details in the regional pest management strategies explaining the outcome of cats that have been trapped or those being surveyed/monitored.

We must assume those that are not able to be rehabilitated or rehomed are euthanised, however there is no information on the results of the surveys. There is also not one consistent approach through local councils to residents keeping cats, and no consideration regarding the management of known cat colonies.

Cats can serve purposes in certain areas to keep rodents under control and a strategy that is collectively applied is not always the appropriate solution and the complexity must be acknowledged.

3. What, if any, are the key barriers to effective management of invasive species?

As stated previously, effective management MUST include greater research and funding of alternative methods in order to also protect the environment, animals, and communities and this is not occurring at either a state or federal level.

Too much emphasis is focused on social license, election pushback and outdated studies and not on the importance of protecting the native habitat, environment and species that rely on those areas for survival. This applies across a broad range of invasive species control, from cat management to feral horses, to the influence of farming and agricultural industries.

In circumstances of the latter, alternatives do exist and are not actively encouraged or promoted by government, perhaps due to the perceived voting push-back by the farming community. This in itself is not effective management.

There is a lack of interest, care, or concern for animals without high public value.

Greater emphasis by government on prioritisation of cost effectiveness above animal welfare.

A poor management and monitoring of native species, leading to a full mismanagement of those species, which has a cascading effect on other species.

Education of existing alternative methods of species control is non-existent. This should be funded and mandatory for all of the farming and agriculture industry. Funding should be drawn from the industry to educate itself. Government should monitor and ensure implementation via legislation.

4. How has invasive species management changed since the introduction of the NSW Biosecurity Act 2015 legislation and associated programs and plans?

The Non-indigenous Animals Act 1987³ was repealed and integrated into the Biosecurity Act 2015 (Act). During the consultation, prior to the new Act, there was concern expressed that the interests of zoos, both government and private, along with private collectors, in particular bird keepers would be ignored under the new Act.

The Non-indigenous Animals Act 1987 (Sections 7-9) constituted an advisory committee – the Non-indigenous Animals Advisory Committee (NIACC). No such committee exists currently and hence the perspective and advice of those who keep animals has been lost.

The lack of this Advisory Committee has resulted in a limited viewpoint when reviewing legislation. On a federal level, this has resulted in the persistent refusal to allow the import/export of certain

³ Non-indigenous Animals Act 1987

exotic species – to be kept as pets which in turn has led to an ever expanding illegal/underground market and non-compliance. This directly affects New South Wales.

The federal and state government's refusal to permit select exotic reptiles from being legally kept as pets by licensed keepers has resulted in a small number of sightings of some exotic reptiles across NSW, this despite the keeping of exotic reptiles being prolific.⁴

It is believed these few reptiles have escaped or been released into the wild, with the latter due to fear of authorities' action. While many will label this as irresponsible behaviour, the majority of times it is due to the owners not wanting to see their pets (albeit illegally kept) euthanised for no clear or justifiable reason. Exotic reptiles would not be illegally released if they were able to be kept under a managed licensing system, enabling the sharing and rehoming of these prolifically kept species. Most escaped (indigenous) reptiles are either returned to their owner or rehomed. There is not the issue of dumped animals with native reptiles as there is with cats or dogs, as most reptiles are sought after and quickly rehomed and herpetoculturists will not breed animals that are not desirable in the pet keeping community.

Alternatively, amnesties that would provide for 'one-off' special permits would also assist in reducing the determined release of such species.

5. What are the future risks posed by invasive species to the NSW environment, industries, and communities?

Simply put, the continued existence of current 'free roaming' populations will impact the environment.

The continued lack of education will see some pets make their way un-controlled into the environment. **Remember a pet is not a pest** until it is no longer owned or maintained by society.

Greater ability for pets to be surrendered and rehomed (confident they will not be euthanised) will go a long way to reducing their ability to become a nuisance.

Legislative changes to support pets being kept in tenancies/strata are slowly being implemented but still do not protect the ability of pet owners to keep their animals. More education of landlords and body corporates on the real impacts of pets on properties is needed.

The continued use of free-baiting, particularly meat laced with 1080 will see greater numbers of pet dogs and cats poisoned. This irresponsible behaviour by government, councils and landowners must be stopped. Many meats are simply collected by Corvidae species (crows, magpies, etc) and flown

⁴ [McFadden et al 2017](#)

from 'baited' areas and dropped into nearby backyards, parks, and other publicly accessible areas. Free/air dropping of meats often sees areas heavily baited with little no warnings posted for the duration of baiting.

Today there are suitable containers and other forms of distribution that would still provide for baiting of certain feral species to continue but without the ability for baits to be transported by other animals or for unknowing bushwalker and their dogs to find indiscriminate baits. Again, greater research and funding for better devices and alternatives to the use of 1080 is vital in protecting our companion animals.

Additionally:

- Pest species require proper investment by government to actually manage them appropriately.
- The cost only increases the longer this is put off, and cost-effective methods become more expensive as time goes on.
- The risk to native flora and fauna only increases the longer this is put off.

6. What opportunities do you see to improve the outcomes of invasive species management in the future?

- Invest in education about responsible pet ownership.
- Develop ongoing strategies in all areas of NSW to assist people to be able to fund the desexing of their animals.
- Provide a clearer pathway through local government for approval of secure cat containment on their properties (enclosures)
- Investments in research and studies on TNR programs to obtain the data required about impacts.
- Consult with conservation experts to look at large scale fencing to create predator free zones.

Improved education regarding responsible pet ownership and cat containment which keeps the cat safe as well as mitigating the opportunities for the cat to become a pest. Education can also be beneficial for other pet owners, for example dogs.

Subsidised desexing for locations with high populations of stray/feral/colony cats (or dogs) will assist in reducing the number of cats that are able to reproduce, which will have an ongoing impact on the number of cats in certain locations.

The Companion Animal Act does not require a council to collect, or accept cats into, their animal care facility. This needs to change.

Strategies are required that Councils collecting the 'data' are to identify where cats and dogs are coming from so that targeted education can be developed. The owner who lets their cat out in their backyard for a few hours per day in a secure environment is not the same as the owner who has cats that are not desexed living outside with minimal food.

Data is also required on the breakdown of cats being euthanised across NSW as not all cats in the 'feral' category fall into the current definition. Cats who are scared will show similar signs to an unsocialised cat.

A clear distinction needs to be made about the treatment of the three main categories of cats as they are not the same – pet cats, stray cats, and feral cats.

Pet Cats: These are cats that are owned by a person/people who have their needs wholly or partially fulfilled by their owners (food, shelter, veterinary care etc), but may live indoors or outdoors. Whilst they may hunt, this is not generally seen as a means of survival, but more using their natural prey drive to exercise.

Stray Cats: These are cats that are most likely to have been a pet cat at some point and socialised with people. The longer these types of cats remain as strays increases the potential for them to fall into the feral category as their contact with humans decreases.

Feral Cats: These are cats that are not formally owned or cared for by people. They survive by hunting for themselves and living in a variety of habitats (urban, rural and bushland). These are actively hunting for food to survive and the most dangerous of the cat categories as an invasive species.

Stray/Feral cats have long divided the community with opposing views on the solution. Without data on how many cats fall into the stray and feral categories and the locations, the solution becomes challenging.

The RSPCA NSW have reported that a trial of free desexing in the Greenacre local council area has reduced the number of kittens coming into their shelter by a third in its first year. This is information obtained via a news article⁵ and the numbers of kittens pre and post the trial are not specific which is why accurate studies are required and data reported publicly.

⁵ [RSPCA News Article](#)

Many people keep the locations of cat colonies secret due to the fear that the cats will be trapped and euthanised, as well as fear for the safety of the colony and negative public sentiment. The secret and transient nature of cat colonies does not promote good welfare outcomes as the cats are unknown and unidentified and have no access to veterinary care if required, or to the ability of desexing, and rehoming these cats.

Alternative Solutions

Without considering alternative solutions to eradicating stray and feral cats and dogs in NSW, these animals will continue to reproduce and not be afforded any veterinary care required. Like all solutions, there is always a cost factor and the debate will be who should bear the cost.

Conservation Fencing:

Australian Wildlife Conservancy (AWC) have created predator free areas across Australia with the use of fencing to keep certain feral animals (e.g., foxes, cats, rabbits, pigs, goats & dingoes/wild dogs)⁶.

AWC have created eleven sanctuaries across Australia covering 12.9 million hectares, and have worked with private landholders, governments and indigenous groups. They are completing surveys at the same time to provide actual data about the conservation work being completed and the impacts on the environment and wildlife.

Trap – Neuter – Return

Whilst it may not seem rational in the short term to return a desexed cat to the same location and environment, we need to be considering long term solutions. The fact is that those cats are not able to produce more kittens, and therefore the cycle of those cats contributing to the feral population ceases.

- We are fighting a losing battle if we are targeting desexing all cats in a colony.
- There is no research in Australian conditions as to whether this program works.
- It will reduce numbers for a period of years as cats who are part of the colony will be unable to breed, however as the colony gets older there will be younger cats coming in to take over.
- There is no evidence that any data on the impact to wildlife has been collected or reported that is associated with TNR Programs.

⁶ [Australian Wildlife Conservancy](#)

- Research is needed to determine if and how this type of program would be suitable for cat management in urban areas, and its suitability in the vast remote areas.
- There is a cost factor involved with no clear pathway as to who will incur these costs and ongoing care or support for the cat colonies.

Sanctuaries

Animal Care Australia proposes a solution to brumby management that would appeal to brumby enthusiasts as well as appease environmentalists and the general public.

Following a One Welfare model - recognising that animal welfare, biodiversity and environment are connected to human wellbeing⁷. – A Brumby Sanctuary is a concept for a multi-function environmental centre and brumby sanctuary - open to the public.

This would have four departments that interlink, and overlap.

1. Rewilding with horses

- Rewilding is a term used in Europe where semi wild herds of horses are grazed in dedicated areas to be a link restoring former farmland into native landscape. Horses are uniquely suited to this purpose. There are several successful programs in the UK^{8 9} and over Europe.
- The rewilding programs are environment based – to improve biodiversity, increase native vegetation, and trees, restoring past land clearing and “pasture improvement” aimed at cattle.
- The horses are semi-wild – meaning they are accustomed to humans and not afraid of them, but rarely handled. They are contained/fenced-in to certain areas, and not free ranging across the Park. Their access to rangeland grazing is carefully planned and monitored and directed by a dedicated management team to improve the land through recognised permaculture principles to restore native grasslands.
- Any breeding of horses is managed, with herd numbers reduced as required, through the Rehoming Centre or gelding of stallions and sterilisation of mares.

⁷ [One Welfare](#)

⁸ [Knepp Castle Rewilding](#)

⁹ [Wicken Fen Nature Conservation](#)

- The rehoming centre would have full-time horse trainers and staff to start initial handling and training of the horses. This allows the horses to be accurately assessed for temperament and physical wellbeing prior to travelling any further. Animals not suited to rehoming can be returned to the rewilding program – remaining onsite - to live out their lives.
- Rehoming organisations and individuals would then be able to transport horses from the Park without injury, and purchase animals at varying levels of education, based on the skills and experience of the homes waiting for them.
- Horses can be trained here for the tourism activities below.
- The centre could be multipurpose for retraining former racehorses for rehoming, for educating horse industry professionals, and run courses for brumby rehoming organisations and adopters.

2. Education and Veterinary Centre

- The vet centre would be a quarantine centre, equine vet clinic servicing the brumby program and local horses, as well as a larger purpose-built wildlife hospital and wildlife sanctuary to rehabilitate injured wildlife found in the Park and neighbouring areas and provide a home for animals that cannot be released.
- The education centre would include conference rooms for wildlife education of veterinary staff and wildlife carers, emergency services training for Technical Large Animal Rescue, and private conferences for related industries.
- Education can also include animal care programs about responsible animal ownership, horse training and first aid for wildlife and pets.
- Equine Assisted Growth and Learning programs for ex-military, troubled youth, suicide prevention and ex-prison reintegration programs could engage with the rewilding herds and rehoming centre horses.

3. Tourism

- A Visitors Centre and Museum on the history of Kosciusko brumbies, their contribution to past Wars, and how the rewilding program works and is progressing. The local environment and landmarks would be included.
- Interactive, hands-on experiences with Brumbies (trained at the Rehoming centre): meet and greet, pony rides, Jackaroo tours, ridden and driven day tours

and multiday ridden/driven camp outs to see the semi wild herds in the Park, and the National Trail, etc.

- Summer pony camps for kids and school excursions. Programs to educate children in juvenile detention, foster care, or respite carers.
- Historical re-enactment displays on special/local events – man from Snowy River, Light Horse Brigade, farming etc.
- Horse free activities such as 4wd tours, bushwalking, bird spotting, photography and artists retreats, and other outdoor adventure activities
- Accommodation, dining, and gift shop

This concept of a government owned facility with tendered operators within it (similar to the ski fields) holds the whole program accountable by keeping it transparent and visible to the public. Government needs to support the concept and provide necessary approvals etc.

Animal Care Australia is not proposing the government fund it.

This project could and should be developed fully inclusive of environmentalists, horse lovers, wildlife lovers, outdoor adventurers, and would be an additional main attraction for tourism to the mountains all year round.

Being a multi-use centre for a broad range of industries, education and a venue for existing government supported programs will ensure that it will be self-sustaining and a significant attraction into the future.

Animal Care Australia has a broad plan for how the sanctuary could be structured, operate, be self-funded and options for where the initial investment of funds could be sourced, so the burden is not all placed on government or charities. We look forward to an opportunity to discuss this in further detail with you.

Wild Dog Fencing and Wild Dog definition:

Animal Care Australia maintains the definition of a 'wild dog' is outdated and a broader scientifically based review of wild dog control is necessary and well over-due.

The recognition of and separation of dingo from wild dogs is vital to the continued ecological and conservation protection of our native wildlife and in turn the reduction of invasive species. Recent studies continue to show the reduction of feral species where dingoes are protected.

Dingoes are Australia's apex predator and are an important part of the ecology, keeping natural systems in balance. Counter-intuitively, a healthy Dingo population is good for small to medium-sized mammals, reptiles and birds as cats and foxes avoid them¹⁰.

Unlike cats and foxes, Dingoes prefer larger prey (e.g. wallabies, kangaroos) so there are less predators of small to medium fauna.

Dingoes also regulate numbers of feral herbivores such as goats, deer, and rabbits, which helps native species.^{11 12}

Management of livestock and pastoral land has been drowning in myth and outdated practices. The updating of the requirement for landowners including farmers to adequately protect the dingo while still removing feral dogs and foxes is vital. The study '**Top predators as biodiversity regulators: the dingo *Canis lupus dingo* as a case study**'¹³ found:

"Harnessing the positive ecological effects of dingoes while at the same time minimising their impacts on agriculture will present a major socio-political challenge. Further research on the taxonomy and ecological function of dingoes and wild dogs will help to resolve such contentious issues. Research into dingo-management strategies that allow for the preservation of dingoes and protection of livestock is urgently required."

A review of the literature on the role of the dingo in the Australian environment identified the following key points:¹⁴

- 1. Dingoes kill and compete with cats and foxes and alter the foraging behaviour of feral cats. This suppression of smaller predators can have net positive benefits for populations of threatened species.*
- 2. Dingoes can control populations of herbivores. Kangaroo numbers increase with rainfall and, when present, dingoes limit their population through predation. This reduces grazing pressure on grasslands.*
- 3. Lethal control of dingoes can disrupt the social structure of packs that would otherwise limit dispersal, hybridisation, and attacks on stock.*

¹⁰ [Austral Ecology](#)

¹¹ [Bush Heritage Aust](#)

¹² [The Conversation](#)

¹³ [Top Predators – case study](#)

¹⁴ [Ecological Society of Australia](#)

4. Alternatives to lethal control and the dingo fence exist. For example, livestock guardian dogs can protect stock from dingo predation. This alternative is cost effective as it will provide a return on investment in 1 to 3 years.

Recommendations:

Again, we recommend consideration is given to regular review of the species lists with a focus on ensuring animals able to be kept in captivity are done so legally and not released, in addition to the following recommendations:

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- **Animal Care Australia recommends the creation of a new committee, similar to the Non-indigenous Animals Advisory Committee (NIACC) and welcomes the opportunity to advise on suitable members.**
 - **Implement a clear definition that excludes pets as pests until they are no longer under an owner's care AND are having an environmental impact.**
 - **Education on responsible pet ownership is needed to develop a greater understanding of the impacts invasive species have.**
 - **Government needs to monitor invasive species and develop achievable management plans rather than relying on quick cost effective – short-term measures.**
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Animal Care Australia thanks **The Natural Resources Commission** for this opportunity and we welcome any questions you may have as you continue to finalise the outcomes of this review.

This submission can be publicly listed.

On behalf of the Animal Care Australia Committee,



Michael Donnelly
President
Animal Care Australia