



Foundation for Rabbit-Free Australia Inc.
Oxford House, 48 Oxford Terrace, Unley SA 5061
mob 0414 600 878
e-mail keryn.lapidge@adam.com.au
www.rfa.net.au

25 July 2006

Mr Stephen Smith
Acting Manager Policy and Planning
Adelaide and Mt Lofty NRM Board
5 Greenhill Road
WAYVILLE SA 5034

Dear Mr Smith

RFA comments on the Adelaide and Mount Lofty Ranges NRM Board's Concept Statement, 2006.

The Foundation for Rabbit-Free Australia (RFA) offers the following comments on the above Concept Statement for consideration by the Board. The comments have been confined to those aspects in the Concept Statement that we consider most relevant for your proposed NRM Plan to minimise losses caused by rabbits across your region. By way of introduction to our comments, we will provide some background on RFA.

Background to RFA

RFA, formed in 1990, is a non-profit entity whose purpose is to encourage research into and communication about the immediate and long-term effects of the European wild rabbit on Australia's natural environment and its natural resource base used for primary production. Prior to the Australian release of rabbit haemorrhagic disease virus (RHDV), formerly known as calicivirus and causing rabbit haemorrhagic disease (RHD), RFA was actively promoting research projects in most of the states and the Northern Territory. The Foundation has been concerned for some time about reduced investment by governments and industry into rabbit research for control purposes since the release of RHDV. Recent funding by Australian Wool Innovation, in cooperation with Meat and Livestock Australia, for rabbit R&D has alleviated some of that concern. The funding flowed on from a national workshop on future rabbit R&D that was convened by RFA in 2005.

RFA is also concerned about the complacency of many land managers, both government and private, with respect to rabbit control following the occurrence of RHD — a biological control agent that was particularly successful in the rangelands but less so in the higher rainfall areas of Australia. This complacency continues in spite of increasing rabbit numbers in higher value lands. We do not want to see rabbit numbers and damage reach the high

levels again, as occurred through similar complacency following the initial success of myxomatosis in the 1950s.

RFA's Strategic Plan is attached for your interest. It provides an insight into the Foundation's proposed directions to address its concerns during next five years.

General Comment on AMLR NRM Board Concept Statement

RFA congratulates the Board on its concept statement which outlines the Board's intentions for the preparation of an integrated natural resources plan for its region.

What will be in the New Plan?

We are highly supportive of the Plan needing to identify key environmental pressures; ways to work with the community to determine appropriate strategies and actions to address the key environmental pressures; and frameworks for the ongoing monitoring and evaluation of both the resource and the action taken.

Rabbits are known to be a current key environmental pressure in the Board's region. Since the initial spread of RHD in 1995, landowners throughout the Board have continually complained that rabbit numbers have not declined, and many of them state that the numbers have markedly increased. There are a number of possible reasons for these observed increases. These reasons include complacency of land managers to control rabbits believing the occurrence of RHD to be sufficient; increased effort in controlling the fox, an important predator of the rabbit; lower effectiveness of RHD, compared to arid areas, caused by the high prevalence of a pre-existing, benign strain of the virus; and reduced effectiveness of myxomatosis due to an interaction with RHD.

Rabbit numbers are expected to continue to increase and cause even greater deleterious effects on the region's economic, conservation and social values. We wish to remind you that rabbits impact on other areas of concern to the Board — they selectively feed on native seedlings affecting regeneration and revegetation; are food for foxes that impact on native biodiversity and spread weeds; create soil erosion and, consequently, impact on water quality; and, of course, they can directly damage agricultural crops.

The increase in rabbit numbers is even more likely to occur with an expected reduced impact of RHD over time (compare with the myxomatosis situation in the 1950s) and continuing complacency by land managers to implement on-ground control.

RFA believes that it is imperative that the Plan includes working with the community, especially land managers and other relevant non-government and public sector entities, to develop practical, cooperative rabbit control strategies integrated across a range of land uses — rabbits do not know land tenure boundaries whether they are private or government (the Concept Statement referred to "cross boundary issues"). This approach is particularly important with a Board, such as yours, that has a breadth of land managers/owners ranging from conservation managers, commercial producers and hobby farmers to people retreating to rural life-styles. They encompass diverse approaches to their responsibilities as land managers, including approaches to rabbit control.

The proposed inclusion of monitoring and evaluating resources and actions in the Plan is strongly supported to provide for funding to ensure that monitoring is actually done. Such

monitoring of rabbit control activities, for example, is fundamental to successful adaptive management (similar to the Concept Statement's "continuous improvement") whereby control strategies can be modified/changed over time, as required, to provide the maximum benefits from the control. Too often resources are committed to control programs with little or no regard to measuring how effective they have been and/or how they may be improved.

What Information do we need to prepare the Plan?

RFA supports the need for information on landscape scale management which fits comfortably with the concept of rabbit control strategies being coordinated across different land tenures, as mentioned above. Importantly, landscape scale management also ensures that rabbit control is integrated with other natural resources management activities — the basis for sound integrated natural resources management.

Education and capacity building are also fundamental for an improved understanding of rabbit impacts as well as effective rabbit control. Land managers will then have the knowledge and confidence to apply the optimal range of rabbit control tactics for their particular problem and to work together with others in their area.

RFA concurs with the need for information on social, economic and policy implications and links to understand land managers' views on the need for rabbit control and, obviously, on a wide range of other NRM issues. We consider that knowing the impact of legislation on land managers' perceptions and behaviour could also be useful.

Risk Analysis

RFA notes that the Concept Statement does not have specific reference to the need for a risk analysis in the proposed Plan. We strongly believe that risk analysis, perhaps overarched by a SWOT analysis (strengths, weaknesses, opportunities, threats) or the contemporary SCORE analysis (strengths, constraints, opportunities, risks and internal/external expectations), provides a valuable tool to set directions and manage risks that may confront the Board, such as risks that threaten effective rabbit control. We consider that the components of risk analysis — including threat identification, risk evaluation, risk management and, importantly, communication — provide a basis to preempt problems and to have strategies in place to manage key threats if they occur.

How Can You be Involved?

RFA is a not-for-profit organisation that has access to members and advisors with a wide range of NRM expertise in the management of rabbits, from research to on-ground rabbit control. We are interested in contributing to relevant workshops and public meetings and could arrange for people to address the different Board Groups in the Adelaide and Mount Lofty Ranges NRM Board.

We believe that due consideration of the need for and ways to implement rabbit control in the Board's Plan is necessary to prevent rabbits from, again, causing the large production and biodiversity losses that they did prior to the occurrence of RHD.

The Foundation wishes the Board every success with the development of its Plan and looks forward to seeing the final product.

If you have any further queries, please do not hesitate to contact me (phone: 08 8379 1540 or e-mail: paven@bigpond.net.au) or our Executive Officer, Keryn Lapidge, through the above contact details.

Yours sincerely

Dr Peter G Allen AM
Chairman
Foundation for Rabbit-Free Australia Inc.

**FOUNDATION FOR
RABBIT-FREE AUSTRALIA INC.**

STRATEGIC PLAN

2005-2010

FOUNDATION FOR RABBIT-FREE AUSTRALIA INC.

Strategic Plan, 2005-2010

Introduction

The Foundation for Rabbit-Free Australia (RFA) is Australia's only publicly-subscribed fund that focuses its activities on the means to eradicate Australia of continuing impacts wrought by the wild European rabbit on our primary industries and our dwindling biodiversity. The primary aims of RFA are to:

- a) Support research, development and extension contributing to the eradication of rabbits in Australia.
- b) Increase government and community awareness of the continuing threat of rabbits to Australia's economic, environmental and social values.
- c) Encourage and support adoption of rabbit control in integrated natural resource management strategies.

RFA seeks to liaise with the three spheres of government, industry, environmental and community agencies/groups to achieve its planned outcomes as set out in this strategic plan.

Context

RFA continues to be greatly concerned with the national decline in rabbit research and development effort and on-ground control, particularly following the success of Rabbit Haemorrhagic Disease (RHD – formerly known as calicivirus) during the 1990s. We believe that the large economic, environmental and social gains made with RHD across Australia's rabbit-affected lands are inadequately acknowledged and are being eroded by lack of appreciation of the continuing threat and accompanying complacency.

RFA also recognises that RHD has not effectively reduced rabbit numbers in higher-rainfall regions of Australia and that the reasons for this situation are not well understood through lack of research effort. In addition, it is inevitable that either rabbit populations or RHD will adapt to their new situation, with the result that rabbit numbers will increase once again, as they did in the 1960s following myxomatosis.

RFA notes that an investment of less than \$5m in RHD, as the second form of biological control for rabbits, and related research in Australia and New Zealand netted an accountable benefit of well over \$100m. This high return on investment excludes the unaccounted biodiversity and social benefits.

Current estimates conservatively value the annual national cost of the exotic European rabbit at \$113m, not including the uncosted high levels of damage to the environment and the social cost — even with low numbers of rabbits post-RHD. This introduced and highly competitive species does not have a place in our landscape and will continue contributing to attenuation to landscape quality without continuing research and control effort.

Rationale for this Strategic Plan, 2005-2010

This Strategic Plan provides directions for the activities and desired achievements of RFA for the next five years. The Plan will be reviewed at least every two years to ensure that RFA's efforts are contemporary and outcome oriented.

Strategic Plan — 2005-2010

Purpose:

Provide a specific focus and support the need for innovative, Australia-wide rabbit control research, development and extension, leading to adoption of acceptable control strategies for a rabbit-free Australia.

Goals:

1. Improved rabbit control R,D& E, regionally and nationally, by identifying priorities and by supporting and contributing ideas and funding to R,D& E programs, where feasible.

Outcomes:

- Independent and informed research advice, needs and program reviews provided for rabbit R,D&E agencies and funding corporations.
 - Rabbit workshops/seminars initiated, facilitated and/or funded.
 - Increased awareness of the need for research on new biological control agents.
2. Increased industry, government and community awareness of the continuing threat of rabbits to economic, environmental and social values.

Outcomes:

- Key audiences for awareness programs identified and targeted.
- Invited specialist journalists funded to prepare high impact rabbit stories for submission to the most effective communication vehicle.
- An informative and up-to-date website maintained.
- An independent voice and commentary provided, where needed.
- Haigh's Easter Bilby Weekend supported.

3. Rabbit control included in existing and new integrated natural resource management strategies.

Outcomes:

- Submissions forwarded to national and state government INRM policies and inquiries, where needed.
- Land managers encouraged to adopt effective rabbit control.
- Government agencies and public/private land managers encouraged to retain and provide rabbit management capacity.

4. Increased rabbit R,D& E capacity in Australia provided through appropriate tertiary training.

Outcomes:

- Acknowledgement by tertiary institutions of the need for trained rabbit researchers and information providers.
- Post-graduate students provided with grant funding by RFA.
- Supervisors suggested by RFA for post-graduate students involved in rabbit research.

5. Funds raised to support RFA's primary aims by increasing the numbers of members and sponsors.

Outcomes:

- Numbers of private and corporate members increased.
- Number of sponsors increased.
- RFA funds enhanced by targeted shares investment.

November 2005