



**Foundation for Rabbit-Free Australia  
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7 July 2006

The Executive Officer  
Vertebrate Pests Committee  
Department of Natural resources, Mines and Water  
GPO Box 2454  
Brisbane Qld. 4001

**RE: AUSTRALIAN PEST ANIMAL STRATEGY – DRAFT 2006**

**Submission by The Foundation for Rabbit-Free Australia Inc.**

### **Background to RFA**

The Foundation for Rabbit-Free Australia (RFA) 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. RFA was formed in 1990 and, prior to the release of rabbit haemorrhagic disease (RHD), formerly known as calicivirus, in Australia, was actively promoting research projects in most of the states and the Northern Territory. During the latter part of the 1990s and early in this century, RFA concentrated on building up its funding base to support rabbit R&D. The Foundation is concerned about reduced investment by governments and industry into rabbit research for control purposes. Recent funding by Australian Wool Innovation, in cooperation with Meat Livestock Australia, for rabbit R&D, following a national workshop on future rabbit R&D that was convened by RFA, has alleviated some of that concern.

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. We do not want to see rabbit numbers and damage increasing again as they did 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.

## **Relevance of the Australian Pest Animal Strategy**

RFA congratulates the Vertebrate Pests Committee's initiative to develop a strategy to provide a national, coordinated focus for the management of pest animals across Australia — a much needed approach, indeed, to coordinate the efforts of stakeholders. We welcome the opportunity to make a submission on the draft strategy, given the importance of pest animals, particularly rabbits, and their large deleterious impact on Australia's economic, environmental and social values.

### **General comments**

Our comments mainly relate to the influence that the Strategy may have on the control of rabbits, though we do appreciate that the rabbit is only one of a wide range of pest animal species in Australia. We applaud the document — it is well laid out and covers the main issues important for sound pest animal management.

We note, unfortunately, that little emphasis or direction is given to the means to provide funding and other resources necessary for the successful implementation of the Strategy — many a sound strategy has not achieved improvements because of a lack of sufficient funding!

RFA acknowledges that the benefits of pest animal management should exceed costs and notes the expressed problem of measuring environmental costs in the Strategy. We believe that the need and means to measure environmental costs should be given greater emphasis.

We make the following suggestions on specific issues.

#### **Scope p.2**

We believe that the scope should clearly recognise both terrestrial and aquatic animals, realising that both types are mentioned in the Strategy. We wonder whether the inclusion of the statement “does not explicitly cover native animals” is really necessary in that the principles and many of the directions in the Strategy provide a useful framework for the management of native animals that may be an identified threat, particularly to primary industry, for whatever reason.

#### **Principles p.3**

Extension should be used to ensure adoption of control measures to minimise the impact of pest animals, not only to raise awareness and educate operators on best practice management, as given in the Strategy — we need to have the action on the ground to make a difference.

#### **Roles and responsibilities p.7**

We believe that relevant industry organisations have an added responsibility to fund R&D to improve pest animal management.

We also believe that it should be clearly stated that the Australian Government should maintain a brief on pests of international significance as base information for risk analyses.

## **Challenges for pest animal management p.8**

The challenges are covered well, though probably the three most important challenges, socio-economic impediments/barriers limiting adoption of pest control by land managers, animal welfare and R&D funding, seem to be lost in the details.

## **National Framework p.10**

We notice that South Australian NRM legislation is missing in the framework table.

## **Implementation p.12**

Forming The Australian Pest Animal Strategy Steering Committee is a most important step in ensuring that the Strategy is implemented — RFA wonders whether consideration was given to having a skills-based Committee rather than a representative committee. A skills-based Committee would permit selection of members with a broad cross-section of required skills, giving the Committee wide credibility and countering any perception of influence by vested interests that can occur with representative membership. The Committee should liaise with the Vertebrate Pests Committee and would be accountable to the NRM Ministerial Council for its policies and performance.

RFA strongly supports the appointment of a funded coordinator to facilitate the implementation of the Strategy. A responsibility of the coordinator would be to report to the Steering Committee.

## **Training p.14**

We suggest that universities need to train researchers in all aspects of science relevant to developing innovative pest animal management, not just ecology and chemistry. Integrated Pest Management (IPM) should be an aim for new pest animal control strategies and relies on many disciplines to be effective — integrating biological control of rabbits with other control tactics is a good example.

RFA is highly conscious that training and research must continue with existing pests. This need is clearly demonstrated with rabbits — we need to be a step ahead of them, even though their pest profile may have been reduced in recent years with the success of RHD.

We strongly support the thought that governments should encourage industry to take a leadership role in pest animal management.

## **Best practice p.14**

RFA suggests that best practice should also include research measuring the impact of pest animal control tactics/strategies on non-target organisms and ecosystems as a whole. Adaptive management is a useful tool that can be applied to achieve best practice, provided that measurable targets are set. Adaptive management principles could be provided for people involved in pest animal control on the web, eg at [www.feral.org.au](http://www.feral.org.au).

## **Categorising pest animals p.18**

RFA believes that the section on categorising pest animals could be strengthened to ensure that there is inter-jurisdictional acceptance of priorities as a whole — a given animal pest species is not likely to be high priority in all states/territories.

**Prioritising assets p.22**

RFA suggests that management agreements between individual landholders and governments be mentioned as a means to support the proper protection of designated areas — these agreements can provide for funding to support the landholder and for monitoring progress.

**Signatories to the Strategy p.25**

RFA considers that the signatories to the Strategy are too narrow in scope given the wide implications to primary industries, resource management, conservation, social issues etc.

We wish the Vertebrate Pests Committee well with this much needed strategy. If you have any further queries please do not hesitate to contact me or our Executive Officer, Keryn Lapidge.

Yours sincerely

Dr Peter G Allen AM  
Chairman  
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**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