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The Director
Invasive Species Section
Department of the Environment and Water Resources
GPO Box 787
Canberra ACT 2601

Dear Mr. Millar

Re: Draft "Threat Abatement Plan for competition and land degradation by feral rabbits"

Submission by the Foundation for Rabbit-Free Australia Inc.

The Foundation for Rabbit-Free Australia (RFA) is Australia's only publicly-subscribed fund that focuses its activities on the means to eradicate from Australia the 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 wild rabbits in Australia.
- b) Increase government and community awareness of the continuing threat of wild rabbits to Australia's economic, environmental and social values.
- c) Encourage and support adoption of wild rabbit control in integrated natural resource management strategies.

RFA seeks to liaise with the three spheres of government, industry, environmental and community agencies/groups; its planned outcomes are set out in RFA's strategic plan that can be viewed on its website — www.rabbitfreeaustralia.org.au.

Context

RFA continues to be greatly concerned with the decline, both nationally and at state level, 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 continue to be inadequately acknowledged and are being eroded by lack of appreciation of the continuing threat posed by rabbits and accompanying complacency.

For these reasons, we commend the Invasive Species Section for reviewing the Commonwealth's rabbit threat abatement plan (TAP) at a time that is critical to draw attention to the continuing threat of wild rabbits to our biodiversity and primary production in much of Australia.

RFA commends the Section for the simplified version of the TAP compared to the previous plan for rabbits — we believe that the revised document will have greater impact for its implementation. The Foundation is also pleased to note that consideration is given to the important need for environmental and primary production rabbit issues to be jointly addressed within the scope of other natural resource management priorities.

RFA is not comfortable with the definition of ‘feral’ in the Glossary and, subsequently, the term ‘feral rabbits’. ‘Feral’ has been traditionally and accurately defined as domestic animals that have escaped and successfully established in the wild, eg “an animal species that has reverted to the wild from domestication” (European Communities 2004, as given in the Australian Pest Animal Strategy 2006). The European rabbit, in contrast to feral cats, was originally released directly into the wild in Australia — it was not domesticated and then escaped into the wild. We maintain that this distinction is important in better understanding the principles of invasive animal management.

It is also interesting to note the use of the word ‘population’ in the TAP when rabbit abundance (density or numbers) is specifically meant — ‘population’ has a much wider meaning than just abundance and RFA believes it should be avoided if abundance is specifically meant.

RFA offers the following comments related to the respective sections of the rabbit TAP for your consideration.

1. Introduction

RFA strongly agrees with the need for the TAP to provide a national framework to guide and coordinate Australia’s response to wild rabbits.

- 1.1 Para 2: suggest that the first sentence be “Mitigating the threat of invasive species is a matter of developing and integrating a number of control methods, not relying on one method, and also understanding and addressing
- 1.2.1 Para 1: wild rabbits are the country’s most abundant small mammals despite the availability and application of chemical and physical control methods as well as the “release of myxomatosis
- 1.2.2 Para 1: RFA cannot reconcile the relationship between small body size and selection of high-quality feed when conditions are favourable — large-sized animals can also do the same. Predators are generally not effective in controlling wild rabbits in Australia
- 1.2.3 Para 2: a reference after the statement about the eradication of cats on islands would be useful.
Para 4: suggest expand “all native species” to “all native animal and plant species” for absolute clarity.
- 1.2.5 RFA strongly suggests that 1.2.5 is titled along the line of **Successful adoption of the TAP**, with the sub-headings:
 - Leadership: who is going to lead the adoption of the TAP, including promotion, consultation/coordination, resources, assessment, and revision?
 - Research and Development: the success of the plan is going to be highly dependent on on-going, long-term research on wild rabbits and their control to take advantage of the gains already made with the control of rabbits. Wild rabbits may already be showing low levels of resistance to RHDV.
 - Stakeholders: as in the draft TAP. It is important that the stakeholders are continually informed of any developments and have an opportunity to contribute where feasible, as with the opportunity to comment on this draft — what will be the process for communication with stakeholders in the future?

2 Objectives and actions

RFA agrees in principle with the five objectives, and suggests that the following changes to Objectives 2 and 3 be given consideration.

Objective 2 becomes “Prevent wild rabbits from increasing in numbers and occupying new areas in Australia concomitant with climate change”.

The main impact of this TAP in reducing the threat of wild rabbits to threatened species will be in reducing or preventing increases in rabbit numbers, rather than limiting rabbits to their current distribution — they already occupy virtually all of their favourable range in Australia. However, the predicted global climate change may result in an increased or changing potential range for wild rabbits.

Objective 3 becomes “Reduce the impact of wild rabbits on threatened species through the development and adoption of improved specific and humane control strategies”.

The main purpose of the TAP is to protect threatened species from wild rabbits, not to kill rabbits, *per se*.

Objective 1

Para 2: 1.2 is given medium priority in table (p 10), not high priority.

Para 3: “cost-effectiveness of a control program must be considered”. RFA believes that this statement, while true, should be expanded to put into perspective the acknowledged difficulties of assessing cost-effectiveness or preferably cost-benefit of wild rabbit control programs focused on environmental gains.

Action: RFA questions whether consideration has been given to include, in the Plan, ways (or need) to secure funds to support the actions in Objective 1, such as government subsidies for wild rabbit control that are available in some other States.

Performance indicators: RFA supports fox control, but presumes that the performance indicator relates to rabbit control in this instance!

Objective 3

Para 3: RFA considers that some operators are willing to use chloropicrin and believes that the phrase “as operators are unwilling to use it” is more emotive than factual and should be deleted. Training operators to use chloropicrin safely is more the issue.

Para 4: RFA strongly agrees with training programs and suggests that the stated lack of skills in rabbit control be qualified with a statement explaining that many younger land managers have not yet experienced high rabbit numbers and the need for applying control methods because of the success of RHDV.

Para 5: RFA suggests that the statement “Control methods need to be more effective and have fewer drawbacks” needs to be explained better or deleted — what are the drawbacks? Wild rabbits will also develop resistance to pathogens used for biological control.

Action 3.3: RFA strongly considers that seeking new biological control agents is a high priority, mainly because wild rabbits are widely distributed and can cause marked environmental damage in the rangelands where pastoralists do not have the resources to control them with non-biological control methods. The resources include both finance and capacity with the marked downturn in both profitability and the number of people managing and working in the rangelands. Further, the concern with the likelihood of emerging resistance of rabbits to RHDV mentioned earlier also supports the high priority classification.

Performance indicators: the first performance indicator does not seem to be linked to an action. We strongly recommend an extra action along the line of improving biological control agents currently occurring in Australia — a most important direction that is already being researched in Australia.

Objective 4

Action 4.1: we suggest that the inclusion of ‘animal and plant species’ rather than just ‘species’ may emphasise that wild rabbits have a broad impact.

Performance indicators: RFA suggests that the second indicator be split into three, viz.

- Improved knowledge of wild rabbit impacts and interactions with other ecological processes.
- Funding for rabbit control activities targeted more strategically.
- Unintended effects of wild rabbit control minimised. (Unfortunately, there will always be some unintended effects.)

Each of these performance indicators can be measured individually.

Objective 5

Performance indicators: RFA suggests that the different performance indicators are presented as individual dot points — each indicator should be measured separately. RFA is concerned that a performance indicator for the measurement of change in public attitude is not included to assess the value of the planned promotion.

3 Duration, cost, implementation and evaluation of the plan

RFA is concerned that the benefits from the Plan, including operational and environmental benefits, are not emphasised upfront again in this section of the Plan. Too often governments concern themselves with costs without fully taking into account the benefits from an investment, especially with conservation issues. Invasive vertebrate pests seem to take second place to other environmental threats such as salinity, even though vertebrate pests cause greater economic, environmental and social losses (Australian Biosecurity Group 2005).

3.2 para 1: check “cats” for “rabbits”

Glossary

Further to the comments on the definition of ‘feral’ at the beginning of this submission, RFA suggests that the definition for Rabbit haemorrhagic disease begins with “A viral disease exotic to Australia” RHD is not exotic in its country of origin.

RFA wishes the Invasive Species Section well with the completion of this important threat abatement plan for wild rabbits in Australia and looks forward to the final plan and, especially, to the adoption of the plan resulting in increased protection of our threatened animal and plant species.

History shows us that both the adoption and success of such plans rely heavily on strong Government leadership, sufficient resources and the support of land managers and the general public — we believe that these issues should be clearly covered in the Plan.

If you have any queries regarding this submission, please do not hesitate to contact our Executive Officer above or myself.

Yours sincerely,

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