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Agriculture, Resources and Environment Committee
Parliament House
Brisbane QLD 4000

Re: Bill to amend the Land Protection (Pest and Stock Route Management) Act 2002 and the Nature Conservation Act 1992 to control the health risks posed by flying-foxes

The Australian Veterinary Association, Queensland (AVAQ) makes this submission to the committee in response to the proposal to amend the Land Protection and Nature Conservation legislation to allow control of flying foxes by lethal or other means on the basis of risks to animal and human health.

Research in recent years has identified a number of viral diseases to be present in flying foxes that are native to Australia including Queensland. In specific circumstances these viral diseases can infect humans and cause fatal disease. However in the Australian situation fatal disease of humans is rare, two fatalities are recognised for Australian Bat Lyssavirus before the implementation of vaccination programs for at risk persons and four persons have been fatally infected with Hendra virus from a known seven human non-fatal infections and potentially many hundreds of persons who have been exposed at horse infection incidents that testing has established did not become clinically affected. This is hardly evidence of an epidemic of flying fox associated disease in the years since 1994.

The AVA Queensland Division does not support the proposed amendment on the basis of risk to human health or community health risks.

The proposal to amend the Land Conservation Act to allow the control of flying foxes is flawed in the presumption that the species can be gazetted as a pest of land or the environment. Clearly with some species on the endangered species lists and all species being native to Australia it is difficult to develop a pest status assessment for the animals. In fact publications refer to the beneficial effect on the natural environment through pollination and germination of various species of flora. Risk of damage to the natural environment is low and insufficient to cause the species to be pest listed.

In the special circumstances where colonies have established within urban boundaries the issue needs to be considered in terms of long term suitability of the control method. Where significant natural habitat destruction in the peri-urban area is thought to be the cause of the translocation of the colonies to the urban environment obviously the intention should be to establish a safe habitat away from urban human and animal populations prior to approval to remove by lethal methods a population of flying foxes. There should not be any urgency as the demonstrated disease risk is low.

The AVA Queensland Division does not support the proposed amendment on the basis of pest status and risk of significant environmental damage.

An economic argument can be made that flying fox damage to fruit should be mitigated. The argument for lethal methods to control monetary loss is flawed in that harassment and shooting will more likely result in confused, hungry and injured animals being displaced into human or animal habitat thereby causing a risk of adverse health effects from the forced interaction.

The economic basis for control should be facilitated by as far as possible non-lethal methods of control. Damage mitigation permits should only be issued to landholders who have already implemented non-lethal methods of control and only after considerations of how the non-lethal methods have been implemented to reduce damage to crops.

Non-lethal control methods such as exclusion netting are not species specific and would offer fruit producers the added protection from birds and other native fruit eating species to be undertaken without the need for trained shooters to be present to destroy the animals.

The cost of deployment of non-lethal methods should be considered as a cost of production and would be balanced by greater returns on productivity and if necessary included in tax concessions for farm enterprises to encourage the use of these methods in preference to lethal non selective management methods.

Humane culling of free living flying foxes requires competent shooters. Allowing unregulated killing of flying fox may lead to people using inappropriate methods with adverse animal welfare outcomes.

The AVA Queensland Division does not support the proposed amendment on the basis of likely dramatic failure of the welfare of animals including non-target species from the deployment of lethal means of reducing crop damage.

As in all instances of native animal culling the science underpinning the population reduction must be studied extensively. Point surveys at sites of fruit production are not a reliable method of population estimation. As many species of flying fox are internationally migratory it would be necessary to study the total population rather than just the Australian component. AVA policies on native animal harvesting reflect the need to establish accurate population estimates, acceptable culling or harvesting methods that minimise the animal welfare concerns and a suitable audit process.

AVA policy statements include;

- Harvesting and culling programs for native animals must be based on current scientific data on population dynamics and habitat to ensure maintenance of viable ecosystems. The AVA opposes any harvesting or culling of native animals that is not based on scientific evidence.
- Programs must be designed and regulated in a way that will prevent unauthorised harvesting or culling of target species and have minimal effect on non-target species.
- Killing methods must be rapid and humane, and carried out by trained, skilled operators.

On this basis, The Australian Veterinary Association (Qld Division) opposes the bill and requests that flying fox management continue to be done through the existing permit system under the Nature Conservation Act.

We urge the government to consider long term solutions to the juxtaposition of encroaching human settlement and flying fox colonies such as the retention or planting of flying fox habitat in areas that are not inhabited by humans.

Kind regards



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AVA Qld Division President