

Inquiry into the Animal Care and Protection Amendment Bill 2022

Submission No: 748
Submitted by: Australian Pork Limited
Publication: Make my submission and my name public
Attachments: See attachment
Submitter Comments:



May 30, 2022

RE: ANIMAL CARE AND PROTECTION AMENDMENT BILL 2022 – PROHIBITION OF THE USE OF YELLOW PHOSPHORUS PIG POISON

Australian Pork Limited, as the manager of the National Feral Pig Management Coordinator Program funded by the Australian Government, supports the proposed amendments to Clause 16 Amendment of Section 43 (Feral or pest animals) to prohibit the use of poisons on feral or pest animals that include the ingredients of carbon disulphide and phosphorus (CSSP) on welfare grounds.

The National Feral Pig Action Plan 2021-2031 (the Plan), the first national strategy for feral pig management, was endorsed by the National Biosecurity Committee on October 6, 2021. With its endorsement, the Plan is recognised as the master strategy on which all of Australia's state, regional and local feral pig management plans are to be based. The national approach for feral pigs is focussed on changing management philosophies and practices of land managers to reduce damages caused to Australia's environmental, agricultural, cultural, and social assets through coordinated and long-term landscape-scale, cross tenure actions.

A key objective of this Program is to drive the adoption of integrated, best practice management of feral pigs by land managers. It is essential that animal suffering is minimised and the most humane methods are used by land managers to control feral pigs, and other vertebrate pests, to maintain social licence to operate by the general community. More humane methods, including sodium nitrite bait, is now available for feral pig control by land managers.

The overarching aim of the Plan is to lead and support all land managers (public and private) to work to more effectively manage feral pigs to reduce their impacts. The Plan seeks to protect assets through the delivery of coordinated, sustained and humane, integrated best practice management to suppress, or eradicate (where feasible) feral pig populations. This program is strongly focussed on ensuring that Australia's natural assets, industries, communities, and people are protected from the diverse threats posed by feral pigs into the future. This will be achieved by increasing the confidence, leadership, and capability of land managers in integrated, best practice management.

The [Model code of practice for the humane control of feral pigs](#) (Sharp 2012) states that the use of carbon disulphide and phosphorus (CSSP) or yellow phosphorus is inhumane and slow acting. When ingested by a pig, it is absorbed through the gastrointestinal tract. Symptoms include lethargy, depression, convulsions, liver damage, reluctance to move or eat, vomiting, diarrhoea, coma and death. Following the ingestion of a lethal dose, death may occur between 2 hours and 5 days after ingestion. CSSP is also not soluble in water, does not readily breakdown in the environment, is toxic to a large range of bird and animal species and can cause secondary poisoning.

Furthermore, CSSP or yellow phosphorus scored lowest on the relative humaneness model than any other control method used for feral pigs due to the intensity of suffering and duration of suffering that this poison causes. The [relative humaneness model](#) was developed to provide land managers and operators with a practical and reliable methodology to identify the humaneness and welfare aspects of the different vertebrate pest control methods.

It is also noted that CSSP is not registered for use by the Australian Pesticides and Veterinary Medicines Authority (APVMA) in all states and territories, except Queensland and Northern Territory. These proposed amendments will bring Queensland's legislation in relation to use of this

poison in line with those of most other state and territory jurisdictions where it has been deregistered. It follows that no agreed national standard operating procedures describing procedures to uniformly apply an ethical approach for the use of CSSP have been developed.

I welcome the opportunity to further discuss this with you.

Yours sincerely



Dr. Heather Channon
National Feral Pig Management Coordinator
Australian Pork Limited

