

The Manager
Wildlife Management Branch
DPIPWE
GPO Box 44
HOBART TAS 7001

By email: wildlife.reception@dpiwwe.tas.gov.au

Dear Sir or Madam

Re: Species Risk Assessment: Giraffe

The RSPCA is grateful for the opportunity to make comment as part of the process for assessing whether giraffes should be added to the list of species that can be imported into Tasmania.

Our comments relate to both the actual species (in this instance, giraffes) and more generally to the keeping of wild and exotic animals.

We note the following points from the species risk assessment:

- giraffes have been assessed by the IUCN as 'vulnerable' due to past (and ongoing) population decline; and
- giraffes are scheduled under Appendix II CITES, which allows only regulated international trade; and
- climate modelling indicates "low" potential for suitable habitat across the entire state; and
- giraffes have been assessed as posing a moderate threat to humans, and so have been assigned to the "moderate" threat category.

Limited information is available concerning the natural health profile of this species and there is little information on endemic diseases, so the risks from exotic diseases are therefore largely unknown. In captivity, medical management is similar to other medium/large ruminants, and they are also susceptible to many diseases common to domestic ruminants. Based on that information, this could include contagious diseases such as clostridial diseases, leptospirosis, brucellosis, anthrax, pasteurellosis, Johne's disease and TB.

As a general principle, the RSPCA is opposed to taking of any animals from the wild for public exhibition, due to the risk of pain, injury or distress arising from the capture, transport, handling and long-term confinement of these animals, and potential effects on the ecosystem from where they are taken.

On that basis, the RSPCA is opposed to the keeping of species for public exhibition where scientific evidence indicates that the needs of these animals cannot be adequately met in a captive environment.

It is therefore our considered opinion that no creditable case can be made for approving importation of giraffes into Tasmania.

However, if the decision is made to approve this application, a number of conditions will need to be met.

All wild animals held for public exhibition must be kept in appropriate conditions that meet their physiological, social and behavioural needs. Some animals have complex needs which can be extremely difficult to provide for in captivity.

We have little knowledge of the needs of giraffes, so further detailed information would be needed in order to assess whether the risk is manageable and, if so, what requirements should be met to ensure these needs are met.

RSPCA believes that no zoo or wildlife park should be permitted to keep or acquire animals unless it can adequately demonstrate that it has the facilities and resources to be able to provide for their behavioural, social and physiological needs over their entire lifetime. Zoos and wildlife parks must also have documented management plans for each species held.

Furthermore, we support the adoption of compulsory national standards and guidelines for zoological parks and aquaria, including species-specific standards for husbandry and care. This should include a requirement for animals kept in captivity to be subject to independent ethical assessment.

Thus, we believe that stringent conditions should have to be met prior to any approval being granted.

Prior to export, the importing facility must be required to:

- ensure individual animals undergo comprehensive health assessments to ascertain their health status and to ensure they met all pre-export requirements;
- provide a detailed assessment of the social, physiological or behavioural needs of giraffes and demonstrate how these can be met through a documented species management plan (including enclosure details);
- ensure the animals can have no interaction with domestic livestock or direct contact with other ruminants in order to minimise the risk of disease transmission.
- be a registered wildlife park or zoo to ensure that the holding facility meets the stringent keeping standards Tasmania applies to all institutions;
- be accredited as a member of Zoo Aquarium Association Australasia or of the World Association of Zoos and Aquariums; and
- have proficient and appropriately qualified keepers for that particular species.

We would of course be pleased to provide further comment should that be required.

Yours sincerely



Jan Davis

CEO

16 July 2021