

The Manager
Parks and Wildlife Services
Natural Resources and Environment Tasmania
GPO Box 44
HOBART TAS 7001

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

Dear Sir

Re: Species Risk Assessment: Emperor Tamarin (*Saguinus imperator*)

The RSPCA is grateful for the opportunity to make comment as part of the process for assessing whether the Emperor Tamarin (*Saguinus imperator*) 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, Emperor tamarin) and more generally to the keeping of wild and exotic animals.

We note the following points:

- The risk assessment determined the Emperor tamarin as being moderately dangerous to humans, having a low establishment risk, and with a low consequence of establishment.
- The Emperor tamarin has been listed by the IUCN as of intermediate status since 1982, and a review last year categorised both of its sub-species as of Least Concern. This negates any argument for importing the animals to establish a security community.
- 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.

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

Furthermore, 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 Emperor Tamarin 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 these animals, 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 Emperor tamarins and demonstrate how these can be met through a documented species management plan (including enclosure details);
- ensure the animals can have no interaction or direct contact with other primate species 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

A handwritten signature in black ink, appearing to read 'Jan Davis', with a large loop at the start and a trailing flourish.

Jan Davis

CEO

15 April 2022