

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: (*Crocuta crocuta*)

The RSPCA is grateful for the opportunity to make comment as part of the process for assessing whether the Spotted Hyena (*Crocuta crocuta*) 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, the Spotted Hyena) and more generally to the keeping of wild and exotic animals.

We note the following points:

- The risk assessment determined the Spotted Hyena as being highly dangerous to humans. The animal sometimes attacks when unprovoked and/or is capable of causing serious injury (requiring hospitalisation) or fatality.
- The risk assessment determined the consequence of establishment (risk that an established population would cause harm) for the Spotted Hyena as being extreme.
- These carnivores are one of Africa's top predators, as is reflected in the commodity damage score for the Spotted Hyena being listed as high. About 70 percent of their diet is composed of direct kills. Their jaws are among the strongest in relation to the size of any other mammal, and they consume animals of various types and sizes, carrion, bones, vegetable matter, and other animal droppings. The Spotted Hyena therefore poses a significant threat to Tasmania's high value livestock industries. It's fiercely predatory nature would also mean it poses a significant threat to native animal species.
- The Spotted Hyena is listed by the IUCN in the category of Least Concern. This negates any argument for importing the animals to establish a security community.
- When taking into account all factors, the risk assessment concluded that the Spotted Hyena should be assigned to the serious threat category. On that basis, the risk assessment recommends that import permits be restricted to licence holders approved for keeping serious threat species.
- Observations and experiences of captive Spotted Hyenas have identified the need for facilities housing hyenas to evaluate their training and enrichment programs often, as the hyenas were found to be capable and fast learners, benefitting from a routine and feeding strategies that included different types of food in varying presentation formats.

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.

On the basis of these facts, we strongly oppose any approval for the importation of Spotted Hyenas into Tasmania.

However, if the decision is made to approve this application, a number of conditions will need to be met. Most importantly, as recommended in the risk assessment, import permits should be restricted to licence holders approved for keeping serious threat species; and that facilities housing hyenas should be required to evaluate training and enrichment programs on a regular basis.

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 physical 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 Spotted Hyenas 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



Jan Davis
CEO

24 September 2022