

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: Bolivian squirrel monkey (*Saimiri boliviensis*)

The RSPCA is grateful for the opportunity to comment on the import risk assessment process in relation to the addition of the Bolivian squirrel monkey (*Saimiri boliviensis*) to the list of species that can be imported into Tasmania.

Our comments relate to this specific animal, the Bolivian squirrel monkey, but also more generally to the keeping of wild and exotic animals.

We note the following points:

- Whilst the Bolivian squirrel monkey does have the capacity to bite humans with enough force to pierce the skin, there is little empirical evidence of aggressive behaviours towards humans; some European zoos display them in walk-through exhibits¹. Overall, the risk assessment determined the Bolivian squirrel monkey as being moderately dangerous to humans, having a low public safety risk, a low establishment risk, and a low consequence of establishment risk².
- The Bolivian squirrel monkey is presently listed as Least Concern (LC) on the IUCN Red List given its population abundance and distribution. However, there are signs of a declining population³. This species is scheduled in the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) under Appendix II⁴.
- A key factor in the risk assessment of importing the Bolivian squirrel monkey into Tasmania was the conventional climate modelling that compared Tasmania's environment to that of the Bolivian squirrel monkey's natural habitat in South America; CLIMATCH revealed a "low" potential for suitable habitat across all of Tasmania⁵.

¹ <https://nre.tas.gov.au/Documents/Bolivian%20squirrel%20monkey%20species%20profile.pdf>

² <https://nre.tas.gov.au/Documents/Bolivian%20squirrel%20monkey%20risk%20assessment.pdf>

³ Ibid, 1.

⁴ <https://nre.tas.gov.au/wildlife-management/management-of-wildlife/wildlife-imports/species-risk-assessments-for-comment/bolivian-squirrel-monkey>

⁵ Ibid

- There is prior evidence of high mortality rates within Bolivian squirrel monkey populations due to outbreaks of both *Klebsiella pneumonia* and *Yersinia pseudotuberculosis*. However, there are now vaccines for both diseases which have proven effective in preventing additional outbreaks⁶.

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. Further, there are the potential impacts on the ecosystem they are exported from and the potential impact on Tasmania's ecosystem following importation.

Furthermore, the RSPCA is opposed to the keeping of species for public exhibition where the scientific evidence indicates that the needs of these animals cannot be adequately met in a captive environment, or where there has been insufficient research to reach educated conclusions on the issue.

Given all the risks posed, the RSPCA has reached the considered opinion that no creditable case can be made for approving the importation of Bolivian squirrel monkeys into Tasmania.

However, if the decision is made to approve this application, several 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. It is exceedingly difficult for an artificial environment to replicate the complex combination of factors that allow a natural environment to facilitate a healthy and sustainable population. Therefore, extreme caution must be exercised.

We have little knowledge of the needs of these animals, so further comprehensive research would be needed to determine if it is possible for the Bolivian squirrel monkey to have a healthy and sustainable life in Tasmania. This is not a simple matter of meeting the bare minimum, but rather we must ensure we are able to meet the ever-increasing animal welfare standards expected in our contemporary community. Further, it must be ensured that it is feasible for Tasmania to meet the ongoing needs of this species given our limited resources.

Although the Bolivian squirrel monkey is relatively adaptable given adequate fruit and insects, the 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 with these plans constantly reviewed by members of the scientific community.

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.

The RSPCA Tasmania believes 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 the Bolivian squirrel monkey 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.

⁶ Ibid, 1.

- 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 the World Association of Zoos and Aquariums; and
- have proficient and appropriately qualified keepers trained to specifically handle the Bolivian squirrel monkey.

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

Yours sincerely

A handwritten signature in black ink, consisting of a large, stylized 'J' followed by a series of loops and a final dot.

Jan Davis

CEO

8 December 2022