

The Manager
Wildlife Management - Exhibition
Natural Resources and Environment Tasmania
GPO Box 44
HOBART TAS 7001

By email: wildlifeexhibition@nre.tas.gov.au

Dear Sir/Madam

Re: Species Risk Assessment: (*Chrysocyon brachyurus*)

The RSPCA Tasmania is grateful for the opportunity to comment on the import risk assessment process in relation to the addition of the Maned Wolf (*Chrysocyon brachyurus*) to the list of species that can be imported into Tasmania.

Our comments relate to this specific animal, the Maned Wolf, but also to the keeping of wild and exotic animals in general.

We note the following points:

- The Maned Wolf has been assessed as a posing moderate threat by the Department of Natural Resources and Environment Tasmania. This assessment was determined on the basis of the following criteria: it poses a moderate danger to humans, it has a low establishment risk, and the consequence of establishment is considered to be moderate.
- A critical factor in assessing the risk of importing the Maned Wolf is the climate modelling (CLIMATCH) that compares Tasmania's environment with the species' natural habitat. This concluded that there is a poor match between these environments. The Maned Wolf is a tropical species and is intolerant of cold conditions (<5°C) and actively avoids enclosed spaces. This could be seen as rendering movement around Tasmania's forest-abundant environment problematic. Further, unfavourable environmental conditions are likely to negate survival of offspring because these are produced during winter months and are fully dependent on parental care for several months. These two factors pose significant challenges not only for its survival in the Tasmanian wild, but also for the management and care of this species in artificial environments.
- The species profile suggests that there would be no negative environmental, primary industries, property, or infrastructure impacts predicted for any free-ranging or escaped Maned Wolves. However, this assessment is questionable.

Maned Wolves are omnivores which feed predominantly on small vertebrates and fruits, with equivalent intake of plant and animal food sources.

The latter are predominantly small rodents but some birds, and occasionally frogs, reptiles or invertebrates are taken. It is likely that establishment of this species in the wild could impact on populations of birds and small mammals; and it could also cause displacement of native animal omnivores eg the Tasmanian Devil. It is also likely that they would injure and kill farmed animals, including sheep and especially lambs.

- In its natural environment, this species is presently threatened by the number of vehicular collisions. Tasmania's road system and its proximity to bushland would mean that establishment of the species in the wild could pose potential risks to humans.

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 potential impacts on the ecosystem they are exported from and potentially unforeseen consequences to Tasmania's ecosystem following importation.

Further, we would stress the difficulty in replicating the myriad of factors from an animal's natural habitat required to maximise animal welfare within an artificial environment. More research is needed before the RSPCA could be satisfied that Tasmanian facilities can provide optimal conditions for the artificial containment of the Maned Wolf.

Given all the risks posed, the RSPCA has reached the considered opinion that no credible case can be made for approving the importation of Maned Wolf 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. As stated before, 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 limited knowledge of the needs of these animals, so further comprehensive research would be needed to determine if it is possible for the Maned Wolf 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.

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 believes that stringent conditions should have to be met before any approval is 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 Maned Wolf 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 the World Association of Zoos and Aquariums; and
- have proficient and appropriately qualified keepers trained to specifically handle the Maned Wolf.

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 circular flourish at the beginning and a horizontal line extending to the right.

Jan Davis

CEO

12 March 2023