

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: Blue-winged Macaw (*Primolius maracana*)

The RSPCA is grateful for the opportunity to comment on the species risk assessment process in relation to the addition of the Blue-winged Macaw (*Primolius maracana*) to the list of species that can be imported into Tasmania.

Our comments relate in the first instance to the general policy relating to species risk assessments, and then to issues relating to the specific assessment for the Blue-winged Macaw.

Demonstration of compelling need

As a general principle, the RSPCA is opposed to the taking of any animals from the wild for public exhibition or private possession. 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. On that basis, the RSPCA strongly believes any application to import a new species should be based on presentation of a comprehensive plan which addresses the costs and benefits of the proposed introduction and demonstrating a compelling reason for the application to be supported.

There is simply not sufficient information provided in species risk assessments such as this one to be able to make an informed decision as to the possible outcomes of a successful application on the basis of animal welfare or, in fact, on any objective criteria.

We would therefore encourage the government to consider introduction of such a requirement in Tasmania as a matter of urgency.

Precautionary principle should be applied

On that basis, the application of the precautionary principle must underpin any proposals to import new animal species into Tasmania.

This is strongly justified for assessing the invasion risks of species, most of which have not been the focus of research or have a limited or no invasion history elsewhere to inform risk assessments.

It is also important to take in to account the uniqueness of Tasmanian ecosystems, meaning that species with limited impacts elsewhere may have well significant impacts here.

The primary risk in many cases is that of introducing new exotic diseases, a major driver of species declines and extinctions in Australia.

Assessments of imports must also recognise that there is some risk – no matter how small – of almost any newly introduced species (the imported animals or their progeny) escaping into the wild. This brings the risk of introducing new exotic diseases, which has been proven to be a major driver of declines and extinctions in Australia, and also the risk of hybridisation and genetic variation.

Trade in live animals, especially those which have been classified as threatened or rare, has the potential to undermine conservation efforts. While there are a number of established approaches to ensure that trade is not detrimental to a species, these are rarely taken into account in risk assessments and are often insufficient to adequately address the potential cumulative impacts.

The consequence of climate change, and risks in the context of climate change projections for 2050 and 2100, must also be factored into any assessment.

Application of the precautionary principle should be in accordance with scientifically based processes that exist (eg under the EPBC Act) for assessing biodiversity values, and a scientifically based process for assessing invasion risks of proposed imports.

Strengthen transparency and accountability

Ensuring trust in regulation in relation to imports of new species into Tasmania requires a high level of transparency and community engagement.

The Department does engage in community consultation about risk assessments for importing live animals (such as this one). However, it does not publish reports that provide an explanation for the decision which is eventually made, and nor is there any requirement to provide a public statement of reasons for decisions. Effectively, this means that only applicants are able to challenge decisions, despite the fact that imports of new species can have negative animal welfare consequences, and also create substantial risk to the environment and communities.

The RSPCA believes that all risk assessment guidelines and manuals used to inform decision-making should be in the public domain. The Department should also be required to provide a public statement including the reasons for each decision and all supporting material.

Where a species has been assessed as not suitable for import, it should be recorded on a prohibited specimens list. This would also assist with the efficient operation of the provisions, as it would prevent species that are known to be unsuitable for import to have to be repeatedly assessed if multiple applications are made.

This risk assessment

We note the following points with respect to the species risk assessment for the Blue-winged Macaw:

- It has been estimated that there are only between 1500 – 7000 mature individuals in the wild. The species has been classified by the International Union for Conservation of Nature (IUNC) as Near Threatened due to the relatively small population that has suffered rapid decline following extensive habitat loss and trapping for wildlife trade. Further, this species is identified under Appendix I in the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

- The Blue-winged Macaw has the potential to develop a variety of diseases, with one of the most problematic being Psittacine beak and feather disease (PBFD). Psittacosis, also called parrot fever, is commonly found in parrots but it can infect both wild and domesticated birds, as well as humans.
- The species is regarded as a generalist with respect to habitat, given they primarily reside at forest borders or near rivers within conditions such as semideciduous, deciduous, humid, and dry forests. However, despite the low likelihood of establishment in Tasmania, the Blue-winged Macaw does have the potential to compete with native species for tree hollows when nesting.
- Using climate modelling, it has been concluded the Tasmanian climate is a poor match for the natural habitat of the Blue-winged Macaw. There is thus a significant risk that its physical welfare will be compromised.
- We have limited knowledge of the needs of these animals, so further comprehensive research would be needed to determine if it is possible for Tasmanian facilities to provide optimal conditions for the artificial containment of the Blue-winged Macaw. This is not a simple matter of meeting the bare minimum requirements, but rather ensuring we are able to meet the ever-increasing animal welfare standards expected in our contemporary community.
- Importantly, macaws are intelligent, social birds that often gather in flocks of 10 to 30 individuals. Any proposal to import these birds would need to take into account mental well-being too – and solitary birds would suffer significant stress and welfare impacts.

Given all the risks posed, the RSPCA Tasmania has reached the considered opinion that no credible case can be made for approving the importation of Blue-winged Macaw into Tasmania.

However, if the decision is made to approve this application, stringent conditions should need to be met.

Prior to export, the applicant 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, and behavioural needs of the Blue-winged Macaw and demonstrate how these needs can be met for these animals through a documented species management plan (including enclosure details);
- ensure the animals can have no interaction or direct contact with other species, in order to minimise the risk of disease transmission; and
- have proficient and appropriately qualified training to specifically handle the Blue-winged Macaw.

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

Yours sincerely,



Jan Davis

CEO

18th March 2023