

The Manager
Wildlife Management – Exhibition
Natural Resources and Environment Tasmania
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HOBART TAS 7001

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

Dear Sir/Madam

Re: Species Risk Assessment: Sri Lankan Leopard, *Panthera pardus koitya*

The RSPCA is grateful for the opportunity to comment on the species risk assessment process in relation to the addition of the Sri Lankan Leopard, *Panthera pardus koitya* 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 issues relating to the specific assessment for the Sri Lankan Leopard.

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. Further, the limited time frame allowed for comment does not facilitate productive contributions to the process.

We would therefore encourage the government to consider reforms to this process as soon as possible.

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 into account the uniqueness of Tasmanian ecosystems, meaning that species with limited impacts elsewhere may have 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 consequences 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 (e.g., 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.

The risk assessment

We note the following points with respect to the species risk assessment for the Sri Lankan Leopard:

- This species is protected under CITES Appendix 1. Therefore, trade is regulated strictly. Due to their susceptibility to prey depletion and habitat disturbance, the Sri Lankan Leopard has suffered the largest range contraction of any large carnivore in Asia at around 87%;
- The species is recognised as vulnerable, with half of the eight subspecies being listed as critically endangered or endangered. The preservation of this species is vital, with only 800 mature adults remaining and their native habitats threatened by industry;
- Whilst leopards are generally adaptable to a wide variety of climates, CLIMATCH found that leopards were not well suited to the climate of Tasmania due to long-term temperature and rainfall patterns. Further, CLIMATCH modelling reveals that Tasmania is the least suitable environment for Sri Lankan Leopards in the country;
- In general, Sri Lankan Leopards prefer medium sized ungulates as food source, but they will also scavenge and hunt a variety of other animals. However, this adaptability is not predicted to be sufficient to ensure adequate nutrition and thus to allow for a population to be established. Further, whilst there is a potential for negative damage to livestock, there is also the potential for benefits to livestock as Sri Lankan Leopards prey upon previously livestock targeting predators.

In summary, then:

- The assigned threat category for leopards is listed as extreme.
- The risk of an individual animal escaping is low, and there is only a moderate likelihood of species establishment. However, there is extreme risk of harm to both people and animals should either of those circumstances eventuate.
- The final risk assessment finds that import of leopards into Tasmania should be prohibited.

Given all the risks posed, the RSPCA Tasmania considers that no credible case can be made for approving the importation of the Sri Lankan Leopard into Tasmania. We thus support the conclusion of the SRA that the application be refused.

However, if a decision is made to approve this application, stringent conditions would 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 meet all pre-export requirements;
- provide a detailed assessment of the social, physiological, and behavioural needs of the Sri Lankan Leopard 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 Sri Lankan Leopard.

We would of course be happy to provide further comments.

Yours sincerely

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

Jan Davis
Chief Executive Officer
19th October 2023