



Wildlife Tourism Australia Inc.
<http://wildlifetourism.org.au>
1770 Running Creek Road, Rathdowney Qld 4287

25 September 2012

The Honourable Andrew Powell
Minister for Environment and Heritage Protection
GPO Box 2454
Brisbane 4001

Re: Wildlife Tourism Australia's policy on the ethical management of flying fox populations in Australia – with reference to the proposed Land Protection Legislation (Flying-fox Control) Amendment Bill 2012 by the Queensland State Government, and comments on the original Bill.

Dear Mr Powell

Wildlife Tourism Australia Inc. is the peak non-profit body in Australia for wildlife tourism. Our mission is to promote the sustainable development of a diverse wildlife tourism industry that supports conservation. This statement addresses the proposed Land Protection Legislation (Flying-fox Control) Amendment Bill 2012 by the present Queensland State Government, and also includes comments on the original Bill.

There are several aspects to this issue, including: wildlife conservation, animal welfare, public perception of threats to health and other aspects, and actual threats to health and livelihood.

Flying foxes play an essential role in dispersing seeds and pollen of many of our forest and woodland plants.

The spectacle of hundreds or thousands of large bats flying out from their roosts is also greatly appreciated by many of our international visitors, as has been well realised by the tourism industry for instance in Cairns, Rockhampton, Ipswich and Brisbane.

Bats are part of our native wildlife in just the same way as our more famous marsupials, and deserving of our protection. Wildlife Tourism Australia does recognise that some colonies are a problem for orchardists and others, but is against any kind of culling unless all other means have been exhausted, the situation has been properly assessed by experts as causing a serious threat to health or livelihood, that the measures are deemed by experts to have a high probability of success and low impact on conservation and animal welfare, proper permits are issued after suitable and thorough consideration, and appropriate monitoring is implemented to ensure that conservation and welfare issues are adhered to.

There has been much discussion lately on the conservation status of grey-headed and spectacled flying foxes. Because of the nature of the roosts and fly-out patterns and the migratory or nomadic habits of flying foxes, accurate census is difficult even for experts, and local public perception (and media reports of same) cannot be considered a reliable measure of conservation status. Various researchers are attempting to assess populations throughout Queensland and these studies must be encouraged to continue if we are to see decisions based on science.

Farmers who are granted permits to cull should undertake training on identification of bats in the same way that duck shooters in other states are required to do, including assessment of their ability in the field, as distinguishing between illustrations is far easier than identifying animals high in

roosting trees or flying into orchards at night.

We are concerned that the 'demonising' of bats by some segments of the public and media can desensitise people to welfare principles (for instance cane toads must be controlled and where possible eradicated, but we deplore some of the very inhumane methods that have been employed by those who somehow blame the toads themselves for the invasion). On welfare grounds we urge (in reference to the existing legislation) that:

- no culling take place during breeding season, when the offspring of culled females will be left to starve. If large numbers of other young animals such as kittens or calves were deliberately left to starve to death this would be clearly seen as a breach of animal welfare legislation. Flying foxes, as witnessed by many carers, researchers, and zoo-keepers, are highly sensitive and intelligent mammals no less capable of suffering.
- Those responsible for culling ensure that any killing is quick and humane. It is difficult to aim a lethal bullet at such a small head or thorax, and one of the main concerns of animal welfare groups about duck-shooting has always been the prolonged suffering of wounded birds. Wounded bats must be immediately sought out and promptly dispatched.

Fears of Hendra virus and Lyssa virus are understandable, but there is much mis-information in the media, the internet, and word-of-mouth. We frequently meet people who are unaware that Hendra cannot be contracted directly from bats but only through contact with sick horses, or that Lyssa can only be contracted by being bitten or scratched by bats, a very unlikely occurrence unless deliberately handling them. When horses are nowadays found dead or dying in the paddock, many are quick to jump to the conclusion it must be Hendra, but crofton weed (introduced from Mexico) is abundant in southeast Queensland and has caused the deaths of very many horses and for horse safety is thus in far more urgent need of control.

There have only been 2 confirmed human deaths by Lyssa virus and 4 by Hendra: comparing this to the many deaths each year by car accident or related to cigarette smoking – or even to bee-stings which on average claim 2 lives a year - the risk is obviously a low one, which with care and sense almost everyone can avoid (not handling bats unless vaccinated for rabies and trained in bat-handling, not allowing contact with secretions from sick horses, not feeding or watering horses under bat-frequented trees etc.).

The proposed Queensland bill (96C) states that “if a landowner in a local government area reasonably believes that the removal or destruction of a flying fox is necessary to reduce the risk of disease or harm to a resident of the local government area or stock in the local government area...”. It is clear that many fruit farmers can assess that there is a possible flying fox impact on fruit farms. Hence, the fruit farmer’s belief in this matter may be valid.

However, in terms of notable risk of Lyssa and Hendra viruses to local residents or stock, it concerns Wildlife Tourism Australia that a local landowner could be considered able to reliably assess such a risk. Hence, unless they take reliable and official scientific advice on this, there is no way that their risk assessment is reasonable. Hence, it can only be properly argued that the proposed change to the bill is highly dubious in terms of the risk of Lyssa and Hendra viruses to local residents or stock.

We also point out that:

- culling and colony removal has been found inefficient in the past because bats will return the following season
- several scientists from James Cook University and elsewhere have warned that disturbance of bat colonies could actually result in an increase in the spread of Hendra virus by disturbed bats
- the suggestion by Premier Campbell Newman of removing roosting trees after colonies have been moved should only be undertaken in very extreme cases where it can be shown the risk could be severe (e.g. a colony adjacent to a major horse-breeding property) and of course after obtaining suitable permits
- we in fact need more roosting trees (including artificial roosts while young trees are

growing) away from residential and major cropping and horse-breeding areas to provide places for bats to relocate to, as the apparent increase in bat populations in some urban areas appears to be due to destruction of their natural roosting areas

- there are measures other than culling – e.g. erection of wildlife-safe netting over orchards (this has been successfully accomplished for wine-growing and other crops, and although expensive ultimately pays for itself and also prevents damage by birds, rodents and other creatures), rotation of horse-paddocks when bat-attracting trees are fruiting or flowering, shelters over water and feed troughs, and close monitoring of horse health.
- Researchers have been making progress with developing a vaccine for Hendra virus, so hopefully this risk will soon be significantly reduced.

Wildlife Tourism Australia thus urges that the proposed amendment be rejected in its entirety and that other suitable changes be made to the original legislation to ensure compliance with what we currently know of bat populations and behaviour, wildlife conservation and animal welfare and that more effort be put into accurate public education and continuing research on this topic.

Yours sincerely

Dr Ronda J Green (chair) and Dr Peter Wood (secretary)
Wildlife Tourism Australia Inc.