



tasmanian conservation trust inc

Director
Wildlife Trade Regulation Section
Department of Sustainability, Environment, Water, Population and
Communities
PO Box 787
Canberra ACT 2600

19 October 2011

Tasmanian Conservation Trust submission on application to add silver foxes to the Live Import List

Dear Sir/Madam,

The Tasmanian Conservation Trust welcomes the opportunity to comment on the submission to add silver foxes (*Vulpes vulpes*) to the Live Export List. We are strongly opposed to this application as the risks associated with the possible importation of *Vulpes vulpes* into Australia are serious:

- If silver foxes were allowed entry into Australia and were approved by state and territory authorities to be kept as pets, it is probable that they could add to the enormous impact which European red foxes currently have on stock animals and native species and as carriers of disease. This impact could be exacerbated if silver foxes became very popular, were kept in areas where red foxes currently are not found in high numbers and were allowed to stray and/or become feral. Given the enormous impact which red foxes have on stock animals and native species, it is totally unthinkable that a new variety could be approved for introduction to Australia which has the possibility of increasing these impacts.
- Red foxes on mainland Australia (the same *Vulpes vulpes* species) cause enormous economic costs. Approximately \$21 million a year in lambing losses, \$190 million a year in other livestock and native wildlife losses and \$40 million a year in control programs. Tasmania is the only state that does not have an established fox population. A Fox Task Force has been established in the state at a cost of \$3.1 million a year

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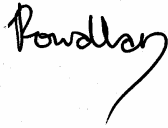
to ensure that fox populations do not take hold. The applicant states in section d) that "*Silver foxes would, like the wild red fox, pose a threat to small livestock such as poultry and lambs, if they were to establish a wild populations. Though domesticated, they have the same genetic physiological capabilities of a wild fox.*"

- Predation by the red fox is listed as a key threatening process under the *Environmental Protection and Biodiversity Conservation Act 1999* (Global Invasive Species Database 2010). The Australian Government 'National Threat Abatement Plan for predation by the European Red Fox' identifies 76 EPBC Act listed threatened animal species and an additional 6 species which are not listed on the EPBC Act as threatened for which Red Foxes are a 'confirmed or perceived threat'. In addition to these national impacts, foxes are a threat to many other species at state, territory and regional level.
- Foxes are carriers for a number of diseases which can be passed on to other animals and humans when in close associations such as the tapeworm *Alveolar echinococcoses* and sarcoptic mange, which is a serious problem in wombats in Australia, as well as various canine diseases (Global Invasive Species Database 2010).
- If the Silver fox is imported it is likely to spark an 'exotic pet fad'. Once this fad is over or people realize that the animal is difficult to take care of, the burden of dealing with the unwanted animals will be left to animal welfare groups such as the RSPCA.
- *Vulpes vulpes* are ranked as 13 on the establishment risk rank = extreme establishment risk and 27 on the Pest Risk Rank (risk of becoming a pest following establishment) = extreme pest risk (Kirkpatrick et al).
- In relation to regulation, once animals are permitted into Australia, they become the state and territories' responsibility to regulate. The added burden of regulating pets that are a declared pest species would be extreme.
- We understand that it is currently illegal to possess a red fox as a pet in any Australian state or territory and therefore it would be highly unlikely that, even if granted approval for importation, the applicant could obtain permission to possess the silver fox. The applicant has not addressed this issue in their application. Until the applicant can demonstrate the potential to obtain approve from a state or territory government for possession of a silver fox, we suggest that any application be refused by the Australian Government. The failure to provide such fundamental information demonstrates that the current

application is unprofessional, vexatious and a waste of the Australian Governments time and resources to have to consider.

The TCT believes that in allowing for the importation of domesticated foxes may set a dangerous precedent. Introduced red foxes have caused untold damage to Australian wildlife as outlined above. It would be unconscionable to permit the importation of the *Vulpes vulpes* just for the sake of a few individuals who would like to keep them as pets.

Yours sincerely,



Jennifer Rowallan
Biodiversity Campaigner
Tasmanian Conservation Trust

Department of Environment, Water, Heritage and the Arts, (2008), 'National Threat Abatement Plan for predation by the European Red Fox', DEWHA, Canberra.

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Kirkpatrick, W., Page, A and Massam, M. (2008) Department of Agriculture and Food Western Australia. Risk Assessment for Australia – Red Fox (*Vulpes vulpes*). Retrieved from: <http://www.issg.org/database/species/ecology.asp?si=66&fr=1&sts=&lang=EN> October 10 2011.