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Introduction

It is understood that the first part of this review examined effective and appropriate control measures and approaches available to manage feral pigs and deer at a regional scale. RSPCA NSW participated in face-to-face consultation opportunities during this phase. It is acknowledged that the current stage of the review focuses on understanding barriers and incentives influencing land manager participation, opportunities to strengthen coordinated action, and the role of compliance and enforcement in supporting regional outcomes. While RSPCA NSW does not have specific expertise in land management compliance frameworks, we take this opportunity to provide written comment from an animal welfare perspective.

RSPCA position on wild animal management

RSPCA Policy E2 Management of wild animals includes the following relevant clauses:

- RSPCA recognises that under certain circumstances there is a need to manage wild animals, where they have adverse impacts on human activities or the environment as well as on welfare grounds [1].
- Independent assessment of the relative humaneness of control methods for managing wild animals and the publication of these assessments assists in identifying the most humane available methods for a given situation [1]. The relatively most humane method is that which causes the least suffering when compared to other methods.
- Where control measures are implemented, these should be carried out as part of an integrated animal management program conducted by competent operators and align with best practice. Lethal methods must only be used where there is no feasible non-lethal, humane alternative which is likely to be effective in achieving the program's aims.
- Where professional or recreational shooters are used in animal management programs, their activities must be effectively supervised by a government agency to ensure competence and compliance with standard operating procedures providing for high standards of animal welfare.

In summary, our position is that all activities to control wild animals should be [2]:

- justified - impact must be legitimate, quantified and appropriately measured to assess progress; benefits must outweigh the harms;
- effective - only proven control methods to be used based on scientific evidence and that ongoing control is achieved, and
- humane – that it is recognised that pest species are sentient, and that the most humane methods are used.

Feral pig and deer management in NSW

RSPCA NSW is concerned that current feral pig and deer management approaches in NSW does not consistently meet the above principles.

Lack of evaluation

There is limited evaluation of current feral pig and deer management programs to determine whether they are achieving their intended objectives, including reducing impacts on the environment, agricultural productivity and native species. As a result, it is difficult to determine whether current management approaches are effective and justified.

Current monitoring is restricted to local reductions in animal numbers rather than evaluating outcomes at an appropriate landscape scale. Localised declines may reflect the movement or redistribution of animals into surrounding areas where control is not coordinated, rather than genuine reductions in overall population size or impacts. Effective feral pig and deer management should be measured by more than the number of animals removed. Success should be defined by achieving sustainable outcomes, including preventing population expansion, minimising impacts on ecosystems and native species, and ensuring control methods are humane and meet accepted animal welfare standards.

There is also little evaluation of animal welfare outcomes. Without assessing the welfare impacts of different control methods, it is not possible to determine whether current management practices meet accepted humane standards.

We recommend that standardised, large scale evaluation is adopted. Evaluation should include:

- Clearly defined objectives and measurable outcomes
- Baseline and ongoing monitoring
- Independent assessment of program effectiveness and animal welfare impacts

Where evaluation involves the use of animals, study design and methods should be reviewed and approved by an appropriately constituted Animal Ethics Committee to ensure animal welfare is appropriately considered.

Lack of coordination

Many control activities appear to occur in an uncoordinated manner, reducing the likelihood of achieving sustained population or impact reduction.

Effective vertebrate pest management requires coordinated, landscape-scale programs [3]. Isolated or opportunistic shooting and other control activities are unlikely to achieve meaningful long-term population control and may instead result in unnecessary animal suffering while providing little conservation or agricultural benefit [3-5].

Putting the onus of control primarily on individual landholders is likely to result in fragmented and uncoordinated management, despite the need for landscape-scale coordination to effectively manage these species. A more collaborative approach is required.

We recommend adopting a coordinated, statewide approach to feral pig and deer management to maximise effectiveness and achieve sustained reductions in impacts.

Lack of oversight and competency assurance

Current approaches rely heavily on land managers managing pest animals on land under their control. However, humane, effective pest management requires land managers to have the knowledge, confidence, skills and resources to undertake control activities appropriately. Some land managers may lack the necessary training, experience or access to equipment, which may limit their ability to implement effective and humane control measures. This is likely to be a barrier to effective and humane pest management. Support mechanisms, including accessible education, training, technical guidance and assistance with equipment or resources, are essential to enable land managers to participate effectively. Cost pressures should also be considered as a potential barrier to participation.

Education should include the animal welfare implications of pest management, including the importance of selecting appropriate control methods, ensuring competency, and understanding both the positive and negative welfare outcomes associated with different approaches. This will support them to undertake effective and humane management.

Methods of control

Poisoning

The available evidence on the effect of 1080 on affected species indicates that it is not a humane poison. As more humane methods exist, the use of sodium fluoroacetate (1080) baiting for feral pigs should be discontinued.

Although feral pigs and deer are classified as pest species, this classification does not diminish their capacity to experience pain, fear, suffering and distress [6]. Pest animal management should therefore aim to minimise animal suffering.

The use of 1080 baiting raises significant animal welfare concerns. Clinical signs following ingestion can occur between approximately 2.8 and 80 hours after exposure and may include excessive salivation, jaw chomping, vomiting, laboured breathing, vocalisation, frantic running, paralysis and convulsions before death [7]. In addition to the welfare impacts on target animals, 1080 poses risks to non-target species through both primary poisoning (consumption of bait) and secondary poisoning (scavenging poisoned carcasses or vomitus). Susceptible non-target animals include native wildlife, as well as working dogs and livestock [7].

An effective alternative exists and should be adopted in preference to 1080. Sodium nitrite is a more humane bait [8]. It induces unconsciousness before death and typically results in death within approximately two hours. It also presents a lower risk to non-target wildlife through secondary poisoning, as residues in poisoned pigs pose little risk to scavenging native species [8].

Where baiting is undertaken, it should be planned to minimise avoidable animal suffering. For example, baiting timing should be considered where there may be the opportunity to reduce the risk of dependent piglets experiencing prolonged starvation or neglect following the death of lactating sows.

Trapping

Trapping should only be used where no practical or more humane alternative is available and should be limited to isolated circumstances rather than routine or broad-scale population management.

Trapping feral pigs and deer presents significant animal welfare risks and is not suitable as a large-scale control method. Captured animals may experience prolonged fear, distress, dehydration, starvation and injury while confined [9, 10]. Feral deer are particularly susceptible to capture myopathy, a potentially fatal condition caused by extreme stress, and may sustain injuries to the face, legs or antlers while attempting to escape [9]. Where multiple deer are captured in the same trap, the risk of injury is further increased.

Trapping is also labour-intensive and inefficient for broad-scale management, limiting its effectiveness as a population control tool [9]. In addition, traps are not target-specific and may inadvertently capture non-target wildlife, livestock or companion animals [10].

The shooting of trapped feral pigs and deer also presents operator safety concerns [10].

Where trapping is considered necessary because no suitable alternative exists, it should be subject to strict animal welfare safeguards. Traps should be checked frequently to minimise the time animals remain confined, and should incorporate measures to reduce stress,

including the provision of shade, shelter and visual barriers such as hessian or shade cloth. Traps should be designed and located to minimise the risk of capturing non-target species.

Shooting

Shooting should only be undertaken as part of a coordinated, strategic pest management program and in accordance with nationally recognised animal welfare standards. The use of bows and arrows to control feral animals should be prohibited.

Humane killing is defined as an instantaneous loss of consciousness followed by rapid death without consciousness being regained [11]. To achieve this outcome, shooting must only be undertaken by competent, appropriately trained and accredited operators using firearms, ammunition and equipment suitable for the target species and circumstances [11].

Where the correct firearm and ammunition are used, a well-placed head shot targeting the brain can produce immediate unconsciousness and death. Accordingly, RSPCA NSW supports the current requirement of the *New South Wales Code of Practice and Standard Operating Procedures for the Effective and Humane Management of Feral Pigs*[12] and *New South Wales Code of Practice and Standard Operating Procedures for the Effective and Humane Management of Feral Deer*[13], which state that shooting should only be performed by competent, trained personnel who have demonstrated marksmanship, hold the appropriate licences and accreditation, and are assessed as suitable for the task. These standards should be mandatory rather than guidance.

Shooting should not be undertaken opportunistically or in isolation. It should form part of a coordinated, landscape-scale pest management program designed to achieve sustained reductions in feral animal populations and their impacts.

The use of bows and arrows does not reliably achieve a humane death and presents significant animal welfare concerns [11, 14]. Animals commonly remain conscious after being struck, experience prolonged pain and distress, and may die only after substantial blood loss. Wounding rates are also significantly higher than with firearm-based methods, increasing the likelihood of animals escaping with severe injuries and prolonged suffering. RSPCA NSW therefore opposes the use of bows and arrows for wild animal control and recommends that this practice be prohibited.

References

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