



“Together, create and apply solutions”

## Invasive Animals Cooperative Research Centre

University of Canberra, ACT 2601, Australia Ph: +61 2 6201 2887 Fax: +61 2 6201 2532  
Email: [contact@invasiveanimals.com](mailto:contact@invasiveanimals.com) Website: [www.invasiveanimals.com](http://www.invasiveanimals.com)

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

### Invasive Animals CRC submission on application to add silver foxes to the Live Import List

Dear Sir/Madam,

The Invasive Animals Cooperative Research Centre welcomes the opportunity to comment on the submission to add silver foxes to the Live Import List. We strongly oppose this application on a number of grounds. The proposal to import *Vulpes vulpes* into Australia for use as a companion animal presents an unacceptable risk:

- Allowing foxes as pets would foster a culture of fox lovers, which could compromise costly fox control efforts. This is especially likely in urban and peri-urban areas where the support of the general public is needed for control to succeed (we have experienced this with rabbit control — rabbits are seen by many as cute animals not to be harmed).
- Bringing potentially free-roaming foxes (as it would be cruel to keep them caged) into urban areas where they were previously absent will inevitably lead to escapes into residential environments.
- When the ‘exotic pet’ fad is over, the animals don’t meet owners’ expectations, or the animals become difficult to manage, foxes would become a burden to already inundated agencies dealing with rescue and homing of companion animals, such as the RSPCA.
- Close association of foxes with people and domestic animals brings the potential risk of disease transmission (eg foxes are known carriers of zoonotic hydatids and heartworm, and various canine viruses).
- From a regulatory perspective, once animals are allowed into the country, they generally becomes the state and territories’ responsibility to regulate — jurisdictional authorities do not want the added burden of regulating pets that are a declared pest species in most areas of Australia. Tasmania in particular is at risk of jeopardising its multi-million dollar investment in fox eradication.
- Current legislation requires that every application must go through a full risk assessment process (with several stages invited for public comment). This obviously uses up precious time, expertise and resources on a process that should be totally unnecessary in this case. The Hawke Review recommended “A streamlined process for screening of applications, with the option of a ‘quick no’ to listing proposals, should be pursued... [including species for which] risks are well known (for example, similar applications have been rejected or species are listed as noxious in States or Territories).” We urge that this issue be addressed to prevent further time wasters.
- There is a current push by many to keep pet cats confined to prevent them preying on wildlife, and to halt the increase in feral populations. There has also been recent attention on the risks of pet dogs attacking people. Why would we want to accept another predatory pet into our communities? Foxes are notorious for their predation of native wildlife and other prey (including other pets).

Silver foxes might provide a small amount of pleasure to a few pet owners and some business for the pet industry, but these benefits are far outweighed by the potential harm that new foxes could cause within our community. If this application is accepted by the federal environment department it would be a stark contradiction to current policy on foxes being a key threatening process. As a final point, allowing importation of 'domesticated' foxes would set a dangerous precedent for others to use for the import of other undesirable pets such as wolf-dog hybrids. The concept of 'domesticated' is an area that should be urgently addressed to close the loophole that almost resulted in the potentially harmful import of Savannah cats.

Yours faithfully,

A handwritten signature in blue ink, appearing to read 'A. Glanznig', with a stylized flourish at the end.

Andreas Glanznig

Chief Executive

8 September 2011