THE CITY OF GREATER GEELONG

COMMUNITY ENGAGEMENT REPORT

DRAFT RABBIT CONTROL PLAN – JUNE 2021



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Introduction

Our Rabbit Control Plan aims to improve rabbit control on City-owned and managed reserves and rural roadsides through a long-term and integrated management approach.

This report describes the key findings and observations from the third and final phase of community consultation. It will be used to inform final changes to the plan before it is adopted by Council and implemented.

BACKGROUND

Rabbits are declared established pest animals under the *Catchment and Land Protection Act 1994*. Landowners and land managers must take all reasonable steps to prevent the spread of, and as far as possible eradicate, established pest animals from their land.

Pest control is a complex issue and there are sometimes varied community views on the actions we should take to control rabbits. As such, we've provided many opportunities for the community to have their say on the development of this draft plan.

HOW WE ENGAGED

Three phases of community consultation were completed to inform the development of our *Rabbit Control Plan*.

PHASE 1

Initial, pre-draft community consultation activities commenced in November 2018. We engaged a renowned rabbit management expert to assist with the development of the plan and the consultation process. A community workshop was held, and the community provided comments via a rabbit control feedback form.

PHASE 2

The second pre-draft consultation phase occurred from August to October 2019. We offered an online survey and delivered three open-house-style community workshops in Leopold, Lara and Geelong.

The first two phases of consultation were summarised in the *Pre-draft Community Engagement Report*, available at <u>yoursay.geelongaustralia.com.au/DRCP</u> and used to inform a draft version of the plan.

PHASE 3

The aim of this third and final consultation phase was to ask for feedback on our *Draft Rabbit Control Plan* 2021–24.

This report provides a summary of our key findings and observations from this last phase of consultation.

How we engaged

Stakeholders, interest groups and the general community provided feedback via online surveys and submissions over an eight-week period – from July to August in 2020.

Unfortunately, government restrictions related to the COVID-19 pandemic prevented us from performing any face-to-face consultation activities during this time.

Overall, we received 51 online surveys (42 complete) and written submissions from 20 stakeholder groups, community groups and community members.

THE ONLINE SURVEY

Using an online survey on our Have Your Say website, we measured survey respondents' level of agreement or disagreement with the following using a Likert (rating) scale:

- 1. the vision (see box inset)
- 2. the three goals (see box inset)
- 3. these statements:
 - a. This action plan will improve how the City controls rabbits.
 - b. This action plan will improve how the community controls rabbits.

Participants were given an open text box to further explain their assigned rating. They were also encouraged to provide general feedback on the plan and other actions they'd like to see implemented. Finally, they were asked for basic demographic information (age and suburb).

SUBMISSIONS

Twenty submissions were received from stakeholder groups, community groups and community members.

- Agriculture Victoria
- Animal Justice Party Victorian Committee and Western Victoria
- Barrabool Hills Landcare Group
- Barwon Coast Committee of Management Inc
- Barwon Water
- Bellarine Bayside Foreshore Committee of Management

- Bellarine Landcare Group
- Brisbane Ranges Landcare Group
- Environment First (rabbit control consultant)
- Geelong Environment Council
- Geelong Landcare Network
- Parks Victoria
- Surf Coast and Inland Plains Landcare Network
- Surf Coast Rabbit Action Network
- Victorian Farmers Federation Bellarine Branch
- Victorian Rabbit Action Network
- Westvic Heritage Management (cultural heritage consultant)

RABBIT CONTROL PLAN 2020–24 DRAFT SUMMARY

Vision

Apply an integrated approach to rabbit control, supported by the community, that enables natural regeneration on our reserves, and restores natural and rural landscapes. We aspire to have no active rabbit warrens on City-managed land.

Goals

- To reduce active rabbit warrens on Citymanaged land to less than one per hectare in the Restoring Rural Landscape areas by 2024.
- To identify the extent of the rabbit infestations on City-managed land outside of the Restoring Rural Landscape areas by 2024.
- 3. To partner with all Landcare groups in programs that will engage and equip rural landowners to control rabbits by 2024.

What we heard

While the overall response to the plan was generally positive, there were some elements of the plan that provoked opposing views.

'Strongly agree' and 'agree' were the most frequent responses recorded on the various Likert scale questions.

The topics most commented on in the survey responses and submissions related to:

- our vision and goals, primarily Goal 1
- our proposed control methods and the associated risks
- restricting control methods to protect native vegetation
- suggested changes to the actions
- the importance of the City partnering with Landcare and other community groups
- providing support for private landowners to control rabbits on their property
- communicating and engaging with the community
- enforcement of noncompliant landowners.

Following is a breakdown of the survey results and a summary of the submissions.

ONLINE SURVEY

Demographics

Survey respondents came from across the municipality, reflecting the importance of the plan across the region (Figure 1). The locations with the highest respondent numbers were Highton, Leopold and Wallington.

The age of the respondents was also well distributed across the lifespan, but the highest number of responses were received from respondents aged 45–54 (Figure 2).

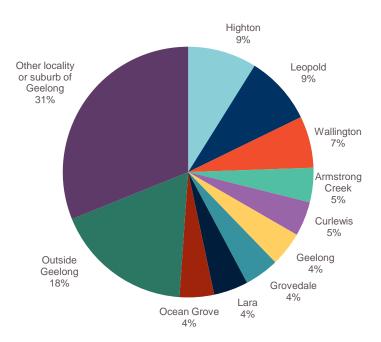


Figure 1: Where do you live?

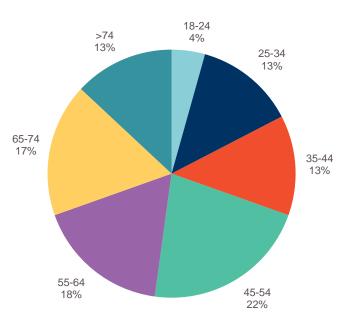


Figure 2: Please specify your age group

Vision

Survey respondents were asked to rate their level of agreement with the plan's vision:

"Apply an integrated approach to rabbit control, supported by the community, that enables natural regeneration on our reserves, and restores natural and rural landscapes. We aspire to have no active rabbit warrens on City managed land."

Figure 3 provides an overall breakdown of responses and shows that 55 per cent of survey respondents strongly agree with the vision. In total, 78 per cent of survey respondents either strongly agreed, or agreed. This is compared to only 8 per cent who strongly disagreed, or disagreed.

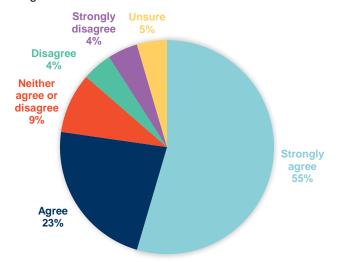


Figure 3:To what extent do you agree or disagree with the vision.

Goals

Survey respondents were asked to rate their level of agreement with the three goals described in the plan:

Goal 1: To reduce active rabbit warrens on City-managed land to less than one per hectare in the Restoring Rural Landscape areas by 2024.

The majority (70 per cent) of survey respondents strongly agreed, or agreed, with Goal 1 (see Figure 4). However, it also received the highest number of 'strongly disagree' responses (11 per cent).

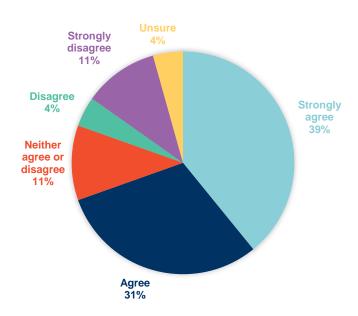


Figure 4: To what extent do you agree or disagree with Goal 1

Goal 2: To identify the extent of the rabbit infestations on City-managed land outside of the Restoring Rural Landscape areas by 2024.

Eighty-five per cent of survey respondents strongly agreed, or agreed, with Goal 2 (see Figure 5). This was the highest percentage of all three goals. Only 4 per cent of respondents disagreed or strongly disagreed with this goal.

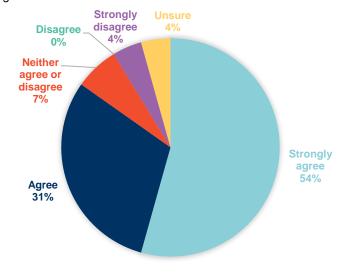


Figure 5: To what extent do you agree or disagree with Goal 2

Goal 3: To partner with all Landcare groups in programs that will engage and equip rural landowners to control rabbits by 2024.

Seventy-seven per cent of survey respondents strongly agreed, or agreed, with Goal 3 (see Figure 6). Goal 3 was the goal that received the highest number of respondents (59 per cent) that strongly agreed with the goal.

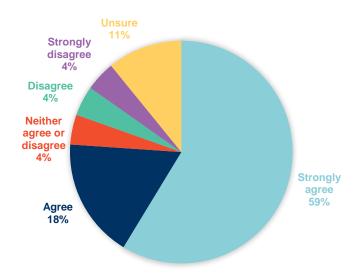


Figure 6: To what extent do you agree or disagree with Goal 3

Statements

Survey respondents were asked to rate their level of agreement with two statements:

This action plan will improve how the City controls rabbits.

Almost two-thirds (64 per cent) of the survey respondents strongly agreed, or agreed, with this statement (see Figure 7).

This action plan will improve how the community controls rabbits.

Fifty-nine per cent of survey respondents strongly agreed, or agreed, that the action plan would improve how the community control rabbits (Figure 8). This statement had the highest number of respondents that strongly disagreed, or disagreed (18 per cent).

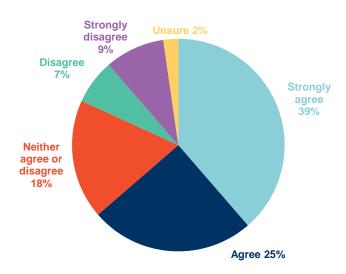


Figure 7: To what extent do you agree that the action plan will improve how the City controls rabbits

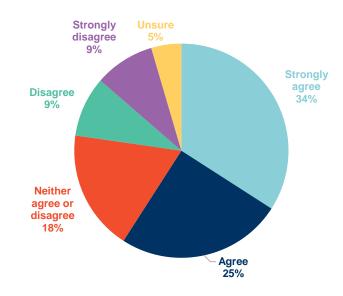


Figure 8: To what extent do you agree or disagree that the action plan will improve how the community controls rabbits

SURVEY COMMENTS

A total of 153 individual comments were provided by survey respondents. We've grouped these comments into 11 categories, each relating to a different section of the plan. Comments have also been grouped further into smaller topics.

Error! Reference source not found. Figure 9 below p rovides a breakdown of the percentages of comments received and how they related to different sections of the control plan. The highest percentage of comments received related to control methods used (27 per cent), the next highest was vision and goals (20 per cent) and the third highest related to the action plan (14 per cent). Approximately 11 per cent of responses included non-specific comments about general topics such as the importance of controlling rabbits or the consultation process, these we have categorised as 'General comments'.

Support for the plan

Some examples of the positive comments included:

- · 'Great work to think strategically. Well done.'
- 'I think that it is a great plan and should receive strong support from the community.'

- 'It is practical, realistic and presented in a way that connects to the people who will read it.'
- 'Great, consultation has clearly been extensive and practical.'

Some examples of negative comments included:

- 'Warren reduction target should be zero per hectare.
 One warren is one too many.'
- 'I disagree with the lethal "control" methods and programs to achieve the objective or a reduction in the rabbit population, just as I disagree with using those methods to control human overpopulation, which has caused and is arguably causing more damage to rural landscapes than rabbits ever have.'
- 'This plan is dependent on whether landowners carry out the rabbit control plan and whether they are expected to cover costs.'

Control methods

The highest percentage of comments received via the survey (27 per cent) were either questioning proposed rabbit control methods, or suggesting additional control options.

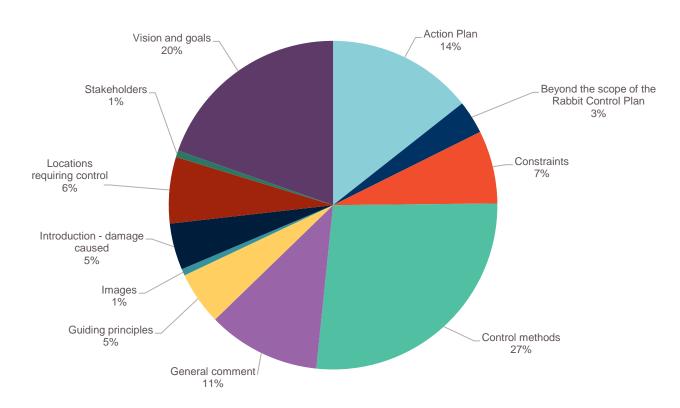


Figure 9: Breakdown of categorised comments received about the plan

Some responses were specifically concerned with:

- the use of poisons to control rabbits because of the suffering imposed and potential to impact off-target species,
- the use of biocontrols, which might infect pet rabbits,
 and
- whether there is evidence rabbits develop resistance to biocontrols over time.

Some responses suggested exploring other control methods such as:

- non-lethal forms of control such us immunocontraception,
- shooting using commercial shooters or hunting groups,
- introducing a bounty for capture of live or dead rabbits,
- harvesting rabbits for food, and
- reintroducing native predators, such as quolls, into areas infested with rabbits.

Vision and goals

Approximately 20 per cent of comments related to the vision and goals.

Vision

There were only a small number of comments on the vision. Of these, some suggested a greater focus on the community and private land to achieve our vision. Another comment said the phrase 'aspire' was too weak and we should 'plan to' have no active warrens on our land.

Goal 1

A high proportion of comments related to Goal 1 did not support the wording to 'reduce active rabbit warrens... to less than one per hectare...', calling it an ineffective goal given warrens can harbour many rabbits that will re-infest the landscape. Some requested we change the goal to zero warrens per hectare.

Goal 2

There were only two comments relating to Goal 2. One recommended we set a deadline for this goal much earlier to find out the extent of rabbit infestations as soon as possible. The other suggested involving Landcare and other community groups to help identify the extent of infestations.

Goal 3

Many comments about Goal 3 emphasised the importance of partnering with Landcare and other stakeholder groups to achieve landscape-scale change. Others argued against relying too heavily on Landcare, as they are a volunteer group with few resources.

While most comments supported this goal, some identified the goal should include other environmental groups and land managers as well.

Action plan

Comments relating to the action plan (14 per cent) were mostly related to the 'collaborate and empower' and 'communicate and engage' principles.

Many comments discussed the City's support for private landowners ('collaborate and empower' principle). They supported current actions, such as we will partner with Landcare groups; but some suggested slight amendments, such as expanding our partner groups.

Multiple respondents emphasised that, for long-lasting results, we need to engage landowners and better equip them to control rabbits on private land. Several suggested the City introduce a private landowner incentive program, or at least provide free or subsidised poison.

Several comments stated that the final plan should include more detail about monitoring and reporting outcomes from the plan. Citizen science and apps were identified as suitable ways to encourage community reporting of problem areas.

Many comments recommended improving how the City communicates and engages with the community, especially around the harm rabbits cause to the environment, agriculture and our infrastructure.

Several comments suggested demonstration plots to show the community the harm rabbits cause compared to a healthy landscape, without rabbits.

Multiple respondents mentioned private land inspections, compliance and enforcement – traditionally, this is a role provided by the Victorian Government – to target landowners who only control their rabbits if they are forced to do so.

Several comments also identified adequate resourcing as key to implementing an effective plan.

Other comments received:

- Eight respondents identified locations in need of rabbit control, or suggested areas to include in the restoring rural landscape target areas.
- Two respondents were worried that, without rabbits, birds of prey will be without a food source.
- One comment suggested that rabbits are now a natural part of the Australian environment and we should simply let them live.
- Some comments suggested we develop an integrated pest management plan that targets other pest vertebrate species – foxes, feral cats and so on.
- Many general comments were in favour of having a plan and welcomed the City's increased focus and resources to address rabbit issues.

SUBMISSION COMMENTS

Of the 20 written submissions received, 17 were from stakeholder groups and 3 were from community members.

There was a diverse range of views about rabbit control in the community. Although many expressed their support for the plan and a willingness to partner with the City to implement a control program, some were critical of the plan for either being: too concerned about the risks associated with various control methods; or not being concerned enough.

The key themes in the submissions were similar to those raised in the survey comments, so we've grouped comments into similar categories and headings.

Support for the plan

There were several submissions from stakeholder groups that praised the plan and expressed a desire to collaborate on its implementation. In particular, several local land managers expressed a willingness to coordinate their control programs with ours.

Most groups who provided a submission were looking forward to working with the City to reduce the impacts of rabbits on primary production and natural resources.

Some submissions emphasised the importance of consulting with the community to capture the diverse views regarding animal welfare and ethical control.

The plan was praised for being clear, concise and practical. One community member from outside Greater Geelong thought the plan was 'sensational' and said they would share it with their local council as a benchmark.

Risk and constraints

Some submissions raised concerns about the proposed rabbit control techniques and risks.

Multiple submissions requested that poisons be avoided – particularly Pindone – due to concerns about animal cruelty and risks to non-target species, such as native fauna. These submissions recommended the City explore non-lethal rabbit control methods, such as immunocontraception, or the re-introduction of native quolls to prey on the rabbits.

One group raised concerns about potential native vegetation loss from rabbit control works and, as such, requested a new principle for the plan – commit to protect all native vegetation, where practicable.

At the same time, members of one group expressed an opinion that warren removal should not be hindered by concerns for native vegetation, as the long-term benefits of removing rabbits from the landscape outweigh the short-term impacts of native vegetation loss.

Fumigating warrens – as opposed to ripping in areas supporting native vegetation – was criticised in one submission as it is a less effective method of rabbit control. The submission recommended not relying on fumigation as a primary method for treating warrens as entrances will be quickly reopened.

The identified risk of harm to cultural heritage sites from ground disturbance activities, such as warren ripping, was praised in one submission. The same submission recommended we obtain cultural heritage permission, where required, prior to beginning works.

Vision and goals

There were several comments about the vision and goals in the submissions received, but Goal 1 generated the most responses.

One group were particularly supportive of our aspiration in the vision to have no active rabbit warrens on Citymanaged land.

However, questions were also raised about the Goal 1 target of less than one active warren per hectare on Citymanaged land. As the industry best practice standard for rabbit control is to treat every warren, it was felt this should be the goal.

Action Plan

The 47 comments made about the action plan came from two submissions. The overarching theme of one submission was that the City should prioritise on-ground action over community education and events. There were also calls for progress and achievements to be assessed independently, with further strengthening of monitoring actions.

Some of the comments suggested changes to wording or timing of when actions should be completed, such as the mapping of warrens on priority sites. Others were statements about the potential barriers to achieving certain actions.

Both submissions commented that several actions lacked detail and required further development – these related to the site prioritisation tool, risk management, Landcare partnerships and restoration and monitoring programs.

Discussion

We expected and received a diverse range of varied opinions on the content of this plan.

While a lot of the feedback was supportive or neutral, rabbit control remains a contentious issue for some sections of the community.

Table 1 contains our responses to the key topics of concern and proposed changes to the plan.

Table 2 contains responses to key topics where no changes have been recommended.

Our responses below are based on rabbit management advice from Government and industry experts and our rabbit control experience.

Table 1. Community engagement feedback that may warrant changes to the plan

TOPIC 1	Pindone use		
Concern	Off–target poisoning of native and domestic animals and the humaneness of lethal control.		
Our response	We must control rabbits to protect habitat for native wildlife. At this point in time, lethal control methods are the only practical option for managing rabbits and baiting is recommended as an essential part of an integrated control program. Our long-term goal is to use baits less frequently, as treating warrens systems will prevent rabbits from quickly repopulating our reserves. We choose to use Pindone when baiting rabbits as it has an antidote, requires multiple doses to be lethal and is slow acting so most rabbits die below ground.		
	The other bait option - 1080 - we consider to be a higher risk option for rabbit control and not suitable for most of our reserves for the following reasons:		
	 domestic pets and other animals are highly sensitive to it, 		
	there is no known antidote,		
	only one dose is required to be lethal, and		
	 as 1080 is a fast-acting bait, it may result in more rabbits dying above ground. 		
	We use Pindone in accordance with the product label and have developed a risk management process to ensure we mitigate risks to people, domestic animals and wildlife. We also inform Agriculture Victoria about planned rabbit baiting programs before we begin.		
Recommendations	Update the plan to include our commitment to monitor and test deceased wildlife if found in the vicinity of a baiting site.		
	 Update the plan to include key measures we take to mitigate risk when using Pindone and include these in the communication plan (Action 25). 		
	 Update the plan to acknowledge the animal welfare implications of controlling rabbits using lethal means. 		
TOPIC 2	Immunocontraception (and other non-lethal control technologies)		
Concern	Using this technology is a way to prevent animal suffering		

Our response

We've contacted the Centre for Invasive Species Solutions and Agriculture Victoria to discuss using immunocontraception as a rabbit control method. We were advised that, while research into this method commenced in the 1990s, it was abandoned in 2005 due to poor transmission rates. The method is currently not an active area of research; nor is it available for use.

Recommendations

- Update the plan to trial non-lethal forms of control (including immunocontraception) if research opportunities arise.
- Keep in contact with the Centre for Invasive Species Solutions and Agriculture Victoria (and other research institutions) in case further research is conducted.

TOPIC 3

Native vegetation (and other constraints)

Concern

Presence of native vegetation (and other constraints) potentially restricts our ability to rip and destroy warrens, reducing the effectiveness of our control programs.

Our response

We assess each site and adapt our site plan to take into account native vegetation, cultural heritage and other constraints such as underground services. Under the *Planning and Environment Act 1987*, we must obtain permission if we believe rabbit control works are likely to impact native vegetation. We must seek further permissions, according to the *Aboriginal Heritage Act 2006*, if we are likely to be disturbing soils in culturally significant areas.

Most of the pre-European settlement native vegetation has disappeared from our region. The City is the custodian of remnant areas of native vegetation on land we manage and we are eager to protect what remains.

Some control methods, for example ripping and implosion, cannot be used in sensitive locations, so we rely on fumigation which causes less disturbance. Fumigation however is less effective and requires greater follow up effort, as the rabbits can reinfest the site quicker than destroying warrens using other methods.

While we must control rabbits and protect native vegetation, sometimes we may have to remove some native vegetation to destroy certain warrens. In line with the *Planning and Environment Act* 1987 and other legislation, this must be done to the minimum extent necessary.

Recommendations

- Continue to comply with our legislative requirements relating to native vegetation and Aboriginal cultural heritage.
- Outline and promote the legislative requirements that must be adhered as part of the communication plan (Action 25).

TOPIC 4

Biocontrol agents

Concern

Biological agents can potentially infect both wild and pet rabbits.

Our response

The Australian Government is responsible for research and development of biological agents and state-wide releases of approved biocontrol agents are coordinated by the Victorian Government. We only play a minor role by assisting the Victorian Government with local biocontrol releases.

The development of a new biocontrol agent is an infrequent event. However, when biocontrol agents have been released, such as the myxoma virus in the 1950s and calicivirus in the 1990s, they significantly reduced wild rabbit populations across Australia.

There are vaccinations available for some calicivirus strains and it is recommended that pet rabbit owners discuss these options with their veterinarian.

Recommendations

- Update the plan to state that we support Australian and Victorian Governments when they release new biocontrol agents, but do not undertake that research ourselves.
- Provide links to Australian Government websites about pet rabbit vaccinations on our website.
- When developing the communication plan (Action 25), include the process we use to inform the community about upcoming biocontrol releases and the risk these may pose to pet rabbits.

TOPIC 5

Goal 1

Concern

Target of less than one warren per hectare should be changed to zero warrens per hectare for the Restoring Rural Landscape target areas.

Our response

Within the Restoring Rural Landscapes target areas alone, we manage over 1,400 hectares of open space across 500 individual land parcels, and approximately 235 km of rural roadsides.

We chose a goal of less than one warren per hectare – rather than zero warrens per hectare – as we didn't think it would be realistic, or measurable, to have all warrens treated across such a large area at one time.

After receiving feedback from community members who questioned the effectiveness of the goal, we've attempted to rewrite it to more accurately represent the standard of rabbit control we're aiming to achieve.

Recommendations

Update Goal 1 to say: Apply an integrated control program to have rabbits and warrens under
effective control* on all City-managed land in the Restoring Rural Landscape target areas by
2026. *Rabbit numbers low enough to enable regeneration in natural areas - warrens ripped
preferably, or fumigated if constraints present, and harbour removed.

TOPIC 6

Controlling other pest animals

Concern

The plan does not address other pest animals, such as foxes and feral cats.

Our response

Controlling foxes, feral cats and other pests is beyond the scope of this plan as it is our understanding rabbits cause the most damage to our environmental, recreational and agricultural assets. The *Rabbit Control Plan* is already an extensive document, so we don't think it would be practical to expand it to include other pest animals.

We currently focus our fox control activities on protecting priority biodiversity assets – for example, fox control is a component of the Hooded Plover Conservation Plan. We also fumigate fox dens when found on City-land. When reviewing this plan in the future, we'll consider expanding it to include other pest animals.

Recommendations

- Add the following statement to page 6 of the plan: 'This plan as it is our understanding rabbits cause the most damage to our environmental, recreational and agricultural assets. When we review the plan in the future, we will consider including other pest animals'
- Modify action 4 and add the following statement: 'When the plan is reviewed, consider expanding the plan to include other pest animals.'

Table 2. Other topics with no changes to the plan

Topic	Concern	Our response
Rabbit harvesting	Harvest rabbits for human and/or animal consumption	Harvesting rabbits is not a practice we can oversee on public land and it does not reduce the impacts of rabbits on the environment and other assets long-term.
		Our focus is to remove the warrens and prevent rabbits from repopulating our reserves which would make rabbit harvesting unviable.
Shooting	The Plan does not include shooting as a control option	The Agriculture Victoria website states shooting is not an effective control technique until rabbits are at very low numbers.
Bounty	Introduce a rabbit bounty	Agricultural Victoria has offered rabbit bounties in the past. However, bounties are not effective in the long term as they reward rabbit harvesting, rather than encouraging integrated control.
Rabbit control on private land	Success of Plan relies on private landowners also effectively controlling rabbits	We think the plan already has a strong focus on supporting and encouraging action on private land (see 'Collaborate & Empower' section of the action plan).
		The plan states we will prioritise works on City-managed land adjacent to rural properties to reward and encourage landowner control efforts (page 18).
		The large number of comments from the community seeking government support to address rabbit issues on private land reinforces the need for the assistance programs proposed in the plan.
inspections, compliance compliance and enforcement	compliance and indicate and enforcement for those not controlling rabbits on their	Comments show the community are wanting the government to do more to entice landowners to control rabbits on private property.
		Pest animal enforcement is a responsibility of the Victorian Government who administer the <i>Catchment and Land Protection Act</i> 1994.
		The plan will incudes that we will report private land infestations to Agriculture Victoria and advocate for the Victorian Government to increase their focus on compliance.

Next steps

This third phase of engagement for the Rabbit Control Plan has given us further insight into community views on rabbit control, as well as some of the gaps in the draft plan.

This engagement report will inform changes to the draft Plan and a final Plan will be sent to Council for adoption.

We will also review the size of the Restoring Rural Landscapes target areas to ensure we can meet our commitments to deliver effective rabbit control on City land within these areas.

We will then continue developing processes outlined in the Rabbit Control Plan relating to:

- · monitoring and reporting
- site prioritisation
- collecting baseline data
- risk mitigation
- support for Landcare and other groups
- incentives for landowners
- restoration and demonstration sites.