

**INQUIRY INTO THE RSPCA RAID ON THE WATERWAYS
WILDLIFE PARK**

Name: Name Suppressed

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Partially Confidential

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The Director
General Purpose Standing Committee No. 5
Parliament House
Macquarie St
Sydney NSW 2000

To whom it may concern,

**SUBMISSION TO THE INQUIRY INTO THE RSPCA RAID
ON THE WATERWAYS WILDLIFE PARK**

As you know, the koalas removed from Waterways Wildlife Park were treated and cared for at the Koala Hospital from the time of their removal in early February 2010 until their return in April and May. I was not present during the initial admission of the animals; however, I had the pleasure of seeing their frames fill out and their fur lighten as their health improved over the ensuing weeks with daily provisions of abundant fresh leaf and close veterinary care.

This submission addresses item (1)(c) of the Terms of Reference: "the criteria used by the RSPCA to determine that the removal of the animals should be undertaken".

Because of the Hospital's involvement in this case, I have monitored the koalas' removal closely in the media. This includes following the contributions made to the Waterways' supporters' fan page – "Support Nancy & Col & the Waterways Wildlife Park" located at <http://www.facebook.com/group.php?gid=311722616909&ref=ts>.

, I am well aware that a Facebook fan page is not regarded as an authoritative source. However, social media like Facebook serve a unique function: they provide information to the public that is uncensored, unavailable elsewhere and publically accessible. In particular, the collection of photographs of the exhibited koalas at Waterways posted to the site by Waterways' supporters BEFORE the koalas' removal offer strong evidence of the ongoing poor treatment and resulting ill-health of these animals. I suggest that these images alone might have justified the RSPCA's determination to remove the animals from Waterways Wildlife Park. The images are made all the more compelling because they have been posted to support the owners of Waterways, when in fact they demonstrate the owners' failure to fulfil their duty of care to these animals under their exhibitor's license.

I have inserted the relevant photographs copied from the "Support Nancy & Col" fan page into this document with a direct hyperlink to each for verification.*

The photographs illustrate three categories of chronic poor treatment:

- 1) Signs of ill health in koalas exhibited at Waterways Wildlife Park (p. [3](#))
- 2) Stressful handling of koalas exhibited at Waterways Wildlife Park (p. [13](#))
- 3) Insufficient leaf provided for koalas exhibited at Waterways Wildlife Park (p. [30](#))

The cumulative effects of illness, excessive handling and malnutrition demonstrated in the photographs of these animals more than justify the RSPCA's actions on 3 February 2010.

Yours sincerely,

* NB Facebook gives dates added not dates taken. Therefore, a number of the photographs predate the establishment of the fan page because they are photographs that supporters have previously posted to their personal Facebook profiles and subsequently linked them to the fan page.

1) SIGNS OF ILL HEALTH IN KOALAS EXHIBITED AT WATERWAYS WILDLIFE PARK

Koalas, especially those from Victoria, inland or mountain regions, have thicker fur than coastal or northern koalas. This means that a physical examination is required to confirm low weight and poor body condition which can be masked by a dense coat.

There is an obvious sign of ill health in the koala that can be visibly detected and that is the darkening of the fur to a muddy brown. Koalas generally have soft, bright grey fur with tinges of dark grey or brown. Several images posted to Facebook depict koalas with very dark brown, lustreless coats which indicate koalas that are sick or debilitated. Cheyne Flanagan, Koala Hospital Supervisor, has confirmed that both koalas K209 and K206 had dark brown, matted fur upon admission.

The Koala Hospital admits 200-300 koalas a year, so staff and volunteers are used to witnessing how veterinary treatment and improved nutrition can transform a debilitated, dark-coated koala to a healthier animal whose grey coat starts to reappear in a matter of weeks.

I have also included a photograph of koala K209 just prior to her return to Waterways in April 2010. The photo shows her coat to be brighter and greyer with only tinges of brown remaining.

Koala K209 is the same koala whose self-aborted her pinkie (unfurred joey) and, accordingly, has been the subject of many conspiracy theories in the media and on the “Support Nancy & Col” Facebook fan page. One such conspiracy theory suggested by two supporters is that the RSPCA actually swapped K209 for a different koala – all because of the radical improvement to koala K209’s colouring upon her return:

there was some discrepancy between the colour of the original koala taken and the ‘mother’ who was returned (Lee Tsakalos, 3 June at 11:18)

1) **Signs of ill health in koalas exhibited at Waterways Wildlife Park (continued)**

http://www.facebook.com/koalahospital#!/group.php?gid=311722616909&v=wall&story_fbid=396714021909&ref=mf

All I will say is they took a chocolate koala and the brought back a grey one you be the judge (Erin McCabe, 23 May at 15:59)

http://www.facebook.com/koalahospital#!/group.php?gid=311722616909&v=wall&story_fbid=392758531909&ref=mf

These statements by Gunnedah locals, who are regular visitors to Waterways, offers inadvertent yet damning substantiation of the koalas' visibly ill health when at Waterways and their positive improvement with medical treatment and care after their removal by the RSPCA on 3 February 2010.

There are also a few images of koalas with outstretched, dangling limbs. This is a characteristic pose for koalas suffering from heat exhaustion and stress.

There is also a photograph of a male koala in the exhibited koalas enclosure at Waterways that has been posted to the Facebook supporters site. This animal also has darkened upper body fur suggestive of ill health. Presumably, he was the father of K209's pinkie (unfurred joey). More significantly, what happened to this male koala? It was not one of the eight removed from Waterways, who were all female. Did it die? How? Has the death been documented?

Finally, a search of the online photo management site, Flickr, produced a photo of a koala at Waterways taken in 2007. The animal shows clear signs of poor body condition as well what looks like a urogenital Chlamydiosis infection. Was this one of the eight koalas removed, or another koala that died during its captivity at Waterways?

2) STRESSFUL HANDLING OF KOALAS EXHIBITED AT WATERWAYS WILDLIFE PARK

One criticism concerning the RSPCA's criteria for removal of the Waterways koalas has centred on the claim that the exhibited koalas were "stressed". For example, Mr Peter Draper cited the following editorial quote in his speech to Parliament on 23 February:

To be told that her beloved koalas were 'stressed' and were to be removed from Waterways—a sanctuary for countless native animals—must have been shattering.

<http://www.parliament.nsw.gov.au/Prod/parlment/hansart.nsf/V3Key/LA20100223015>

The incredulity around the RSPCA's suggestion that these koalas had been suffering from stress is based on anthropomorphic assumptions about how stress is supposed to be expressed. Koalas do not display stress in ways that we expect. Our benchmark for animal behaviour comes from domestic animals: cats whose tails fluff out and who hiss and scratch when anxious; dogs that whine or bark and bite. Both animals act out. Similarly, human beings express stress in physical and verbal ways. Conversely, koalas, whether wild or in captivity, do not demonstrate stress in the same way as other animals or humans. A koala can appear outwardly docile when it is actually coursing with cortisol (stress hormone). Therefore we need to try to understand koalas and their unique behaviours from the koala's point of view, not overlaid with our experience of domesticated animals.

To the layperson, the behaviour of a koala under anxiety and stress is not commensurate with the stress response we are familiar with in humans or even other animals. For example, a koala may only widen its eyes when it is frightened, whereas a different animal feeling the same amount of stress would bite or lash out. Koalas endure a lot

2) Stressful handling of koalas exhibited at Waterways Wildlife Park (continued)



of stress without seeming to express it, or by showing it in unexpected ways that only an experienced handler can (or should be able to) read.

There is one very clear indication that a koala is stressed and irritated, which any carer should be aware of: ear-flicking (see Jackson, Australian Mammals: biology and captive management:

http://books.google.com.au/books?id=Ys_NC1P9AX4C&lpg=PA161&ots=HwPH6SBY9u&dq=ear%20flicking%20koala&pg=PA161#v=onepage&q=ear%20flicking&f=false). Flicking of the ears means something like, "I don't like you touching me. Leave me alone." You can watch a short video example of this behaviour filmed at Featherdale Wildlife Park:

<http://www.youtube.com/watch?v=8KW3E9uikgI>. As you can see, the visitor "tickling" the koala has no idea that the koala's behavioural response indicates stress and displeasure.

What has this got to do with Waterways? Of course, an experienced handler or keeper should recognise the animal's discomfort and reserve this unwelcome handling to when it is absolutely necessary (such as when treating for illness). However, Nancy Small either does not know this about koalas, or ignores their discomfort in favour of her own proclivities. On 23 April 2010, following the return of the five koalas, *Prime TV Tamworth* published a news video, entitled "Koalas settle in", showing Nancy Small with the returned koalas at Waterways. In the video, Nancy Small is shown scratching under the neck of one of the koalas, while the koala is flicking its ears in distress

<http://tamworth.iprime.com.au/index.php/news/prime-news/koalas-settle-in-video.363941>. If the Waterways owner is willing to flagrantly ignore koala handling protocols designed to prevent causing distress to koalas, it speaks volumes about the questionable quality of care these animals have endured at the Park.

The Facebook fan page photographs show numerous cases of the exhibited koalas being handled regularly by the general public. This does not constitute a safe and secure environment for the koala. According to Clause 8 of the Standards for Exhibiting Australian Mammals in New South Wales:

2) **Stressful handling of koalas exhibited at Waterways Wildlife Park (continued)**

(1)(c) Protection from Noise, Harassment and Stress

Each operator exhibiting koalas to the public must:

(i) provide a sufficient number of experienced, identifiable staff in attendance at any session allowing visitors to interact with koalas to protect the koalas from abuse and harassment where koala interaction occurs and to ensure that undue stress on the koalas does not occur (page 6,

<http://www.dpi.nsw.gov.au/agriculture/livestock/animal-welfare/codes/exhibited/australian-mammals>).

As the above quotation stipulates, these interactions should closely monitored by an experienced keeper at all times, yet a keeper does not ever seem to be present in these photos. The majority of people handling koalas in the photos are young children and even babies. Frequently, the child is in striking distance seemingly without a keeper's supervision. This is a dangerous breach of Occupational Health and Safety legislation. Although koalas are generally placid, they are still wild animals and can take a swipe without warning.

The frequent handling of these koalas is a significant stressor that has no doubt contributed to their debilitation. The handling of the koalas needs to be confined to a single "session" so that each koala gets a considerable break from contact with the public "*to ensure that undue stress on the koalas does not occur*". For example, the koalas on handling 'duties' need to rotated so that only one koala should be handled on a given day and not for more than 30 minutes. This would ensure that each koala is only exposed to the public one day a week, not every day *en masse* as these photos seem to suggest.

3) INSUFFICIENT LEAF PROVIDED FOR KOALAS EXHIBITED AT WATERWAYS WILDLIFE PARK

The greatest environmental stressor to koalas in the wild is undoubtedly habitat loss. This means less food and less shelter for wild koalas. The Koala Hospital's close involvement with the research undertaken by Koala Infectious Disease Research Group, Faculty of Veterinary Science, University of Sydney, has helped us understand how dramatically the stress borne by insufficient food and shelter can impact koalas' physical and psychological health. Such stressors are thought to exacerbate koalas' susceptibility to diseases such as Chlamydia.

Koalas kept in captivity should be exempt from these stressors. There is no excuse for the koalas at Waterways Wildlife Park to be underfed. Unlike in the wild where koalas may have to travel within their home range to locate sufficient and suitable eucalyptus, the owners of Waterways are responsible for providing an adequate amount of food to the koalas in their care.

However, numerous photographs on the Facebook fan page show entirely inadequate amounts of leaf to maintain the Waterways koalas at a healthy weight. Many of the photographs show branches that have been stripped completely bare of leaf. This is not the same as a dog eating everything in its food bowl; koalas "browse" their leaf guided by an advanced sense of smell that divines which is the most palatable leaf. Nor should a koala be expected to eat all the leaves on a branch. This is not how it works in the wild – once leaf is nibbled from one branch, it is usually not returned to immediately – the koala effectively prunes areas of the tree and then allows the tree to replenish itself. Therefore koalas in captivity need an abundance of leaf in order to eat some of the leaf and reject the rest. For the Waterways koalas to devour their eucalyptus back to bare stalks in some cases suggests an act of desperation to secure the 500g of leaf a day they require to survive.

Captive koalas also require at least three eucalyptus varieties, as stipulated by Clause 8 of the Standards for Exhibiting Australian Mammals in New South Wales:

3) **Insufficient leaf provided for koalas exhibited at Waterways Wildlife Park (continued)**



(4)(a)(i) it has guaranteed access to adequate fresh supplies of leaves from at least three suitable koala food tree species (page 8, <http://www.dpi.nsw.gov.au/agriculture/livestock/animal-welfare/codes/exhibited/australian-mammals>).

This practice is designed to replicate the way koalas in the wild move from tree to tree searching out different species. In these photographs, I don't see more than two species of leaf on offer.

Clause 8 of the Standards for Exhibiting Australian Mammals in New South Wales also mandates that:

(4)(a)(ii) A sufficient quantity of eucalypt leaves must be provided continuously and replaced at least once daily (page 9, <http://www.dpi.nsw.gov.au/agriculture/livestock/animal-welfare/codes/exhibited/australian-mammals>).

For these koalas to get through this much leaf, either they are not getting nearly enough or they are not getting fresh leaf every day.

It is important to note that, not only is leaf the primary source of nutrition, but it is also the koala's primary source of hydration. Although the commonly understood meaning of *koala* as "no drink" is apocryphal, it is true that koalas rely upon the moisture in eucalyptus leaf for their fluids. Leaf that is not cut fresh every day cannot possibly provide adequate hydration. Inadequate hydration leads to heat stress and exhaustion which some of the Facebook photographs suggest these animals endured.

Finally, leafy branches do not only provide moisture and nutrients; they also function as a shade in the heat and shelter from the rain. Leaf cover also provides the animal with a sense of security already sadly diminished by the frequent inessential handling at Waterways.