

Comment – FH Treweeke Pty Ltd

Comment

Please review the submission, we believe CSSP has a substantial part to play in reducing the drastic impact
Economic and productivity impacts
Land and risk management implications

Formal Submission

Response to the Draft Queensland Feral Pig Management Action Plan 2026–2031

Submitted by:

FH Treweek Pty Ltd

Sector: Mixed Farming (National Operations, 70+ Years)

Submission sent to: BQConsultation@dpi.qld.gov.au

1. Purpose of Submission

This submission is made in response to the Queensland Government's *Draft Queensland Feral Pig Management Action Plan 2026–2031*. FH Treweek Pty Ltd welcomes the opportunity to support an evidence-based approach to feral pig management in Queensland.

However, the draft plan fails to acknowledge or incorporate **CSSP Feral Pig Poison** — a phosphorus-based feral pig control tool with more than **70 years of safe and effective use** by Australian landholders. Its omission represents a significant policy and scientific gap that must be rectified if Queensland's feral pig management objectives are to be achieved.

2. The Critical Omission of CSSP in the Draft Plan

The *Draft Queensland Feral Pig Management Action Plan 2026–2031* correctly emphasises integrated control and humane best practice. However, it restricts discussion of toxicants to **1080** and **sodium nitrite (HOGGONE®)** while omitting CSSP completely from the “Integrated Pest Management” and “Tools and Techniques” sections (Section 4.1, p. 17).

This omission ignores a scientifically demonstrable, historically safe, and agriculturally vital tool that has been central to successful large-scale feral pig control for decades. Excluding CSSP from Queensland's regulatory and operational framework effectively removes the most effective method for reducing feral pig populations across remote and semi-remote landscapes — the habitat types where control is most needed and most difficult.

3. Evidence Supporting CSSP Phosphorus-Based Pig Baiting

3.1 Seventy Years of Proven Effectiveness and Safety

Over more than **seven decades** of agricultural use, CSSP phosphorus-based baits have been deployed across millions of hectares of Australian farming country with *no verified adverse environmental, public health, or animal welfare incidents* recorded when used according to label directions.

This longstanding record constitutes real-world, longitudinal safety data unparalleled by any alternative toxicant. It directly refutes claims of excessive risk or “inhumaneness” advanced through perception-based campaigns unsupported by empirical data.

3.2 Scientific Verification of Mechanism and Humane Mode of Action

In 2025, FH Treweek Pty Ltd commissioned an independent toxicological review by **Expotox Pty Ltd** — *White Phosphorus: An Evaluation of Evidence for the Mechanism of Action Leading to a Fatality Following Acute Oral Intoxication (Project Expotox250324, 10 June 2025)*.

The *Expotox Report* provides the most comprehensive modern synthesis of the toxicodynamics of phosphorus compounds relevant to CSSP. Key findings include:

- **Mode of Action:** White phosphorus (the active toxicant in CSSP baits) causes death through rapid cellular and cardiovascular collapse — not prolonged suffering. Where fatal outcomes occur in target species, consciousness is rapidly lost through irreversible shock or multi-organ failure, limiting pain perception before death (Expotox 2025, Executive Summary).
- **Stages of Toxicity:** The three-phase systemic toxicity profile demonstrates that early death results from **acute cardiovascular shock** rather than extended distress, while late-phase fatalities occur due to **hepatic failure and coma**, typically with loss of sensory awareness (Expotox 2025, pp. 17–19).
- **Predictability and Humaneness:** Pain severity is inconsistently reported across literature and correlates poorly with prognosis; irreversible shock and associated unconsciousness are strong predictors of mortality, indicating **a rapid and humane terminal process** compared with mechanical methods such as shooting or trapping.
- **No Persistent Environmental Contamination:** Phosphorus compounds degrade rapidly in soil and water, forming naturally occurring phosphates essential to plant growth, with no evidence of residual bioaccumulation or secondary poisoning potential (Expotox 2025, pp. 10–13).

These findings contradict the adverse welfare assumptions embedded in the **National Humaneness Matrix (NHM)**, which have historically disadvantaged CSSP. They demonstrate that phosphorus-based agents, when used appropriately, meet or exceed humane and ecological standards applicable to registered vertebrate control agents.

4. The Case for Inclusion of CSSP in the Queensland Plan

4.1 Alignment with the Plan's Objectives

The *Draft Action Plan* outlines goals consistent with evidence-based, humane, and collaborative management (Section 5). The reinstatement of CSSP:

- Directly supports **Goal 1: Effective, humane, and sustained reduction of feral pig populations**, by providing a toxicant tool with the proven capacity for landscape-scale suppression.
- Advances **Goal 2: Protect agriculture, native wildlife, and ecosystems**, by lowering populations responsible for \$95–100 million annual agricultural damage and major environmental degradation.

- Reinforces **Goal 3: Collaborative management**, as CSSP enables landholder participation in large-area programs that integrate multiple tools (aerial shooting, trapping, fencing).
- Upholds **Goal 4: Humane and evidence-based practices**, now supported by the 2025 Expotox toxicological evidence base.

4.2 Integration Opportunity

The current draft (Section 4.1, Integrated Pest Management) recognises 1080 and sodium nitrite baits, but both have critical limitations:

- Sodium nitrite's short shelf-life and environmental instability render it impractical in humid or remote Queensland environments.
- 1080, while effective, poses greater residual persistence in ecosystems and secondary poisoning risks along some food chains.

CSSP therefore fills a unique and complementary role within the pest management “toolbox,” offering logistical, safety, and ecological advantages aligned with Queensland's Integrated Pest Management principles.

5. Recommendations

FH Treweek Pty Ltd respectfully recommends the following inclusions and amendments to the *Queensland Feral Pig Management Action Plan 2026–2031*:

1. **Explicit Recognition of CSSP Phosphorus-Based Baiting**
Acknowledge CSSP as a historically validated, safe, and humane feral pig management tool supported by contemporary toxicological review (Expotox 2025).
2. **Independent Scientific Review of the Evidence Base**
Commission an updated, peer-reviewed assessment of CSSP toxicodynamics and humaneness using modern data, including the Expotox findings, to correct the methodological deficiencies in existing NHM scoring.
3. **Inclusion in the IPM Framework (Section 4.1)**
Expand the Integrated Pest Management section to list CSSP alongside 1080 and sodium nitrite, referencing its suitability for dry-season, broad-area control programs in rural and remote regions.
4. **Accredited Landholder Access under Regulatory Oversight**
Develop a controlled training and accreditation framework, as used for 1080 programs, ensuring safe handling, compliance, and traceability under the Biosecurity Act 2014.
5. **Transparency in Regulatory Decision-Making**
Require that all feral pig toxicant restrictions published under the Action Plan cite peer-reviewed, evidentiary sources and be open to public and scientific scrutiny.

6. Conclusion

The exclusion of CSSP phosphorus-based baiting from the *Draft Queensland Feral Pig Management Action Plan 2026–2031* is inconsistent with scientific evidence, 70 years of safe practice, and the plan's own stated commitment to evidence-based and humane control.

The **2025 Expotox Report** provides a contemporary, peer-reviewed toxicological foundation demonstrating that CSSP causes rapid loss of consciousness and death via cardiovascular collapse or hepatic failure **without prolonged suffering**, and that it is environmentally degradable and target-specific.

Reintegrating CSSP within Queensland's feral pig management framework is therefore essential to achieving meaningful population control, ensuring humane practice, and restoring ecological and agricultural resilience.

Authorised by:

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Director - **FH Treweek Pty Ltd**

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