

S00185 – Adrian Manning

I am broadly supportive of the changes, but have some specific comments. My interests mainly fall in the "Research" and "Translocations and reintroductions" licence classes.

Consultation questions

Do you support the proposed changes to scientific licence classes?

Yes

Do you have any suggestions to simplify the conditions for scientific licences?

Ecological research and translocation projects face a number of significant array of challenges before they begin. It is an area in Australia with limited resources and limited human capacity. It is critically important that licencing processes do not unnecessarily add to the the burden of challenges that face researchers and conservation managers. Indeed, the worst outcome would be that concerns about the administrative burden of licencing would mean that researchers and managers abandoned projects before starting because of an onerous application process. While it is important to ensure that a given research project or translocation is responsible, and will not have a significant impact on native species populations, licencing should not result in the abandonment of projects. Therefore, a simplified process is necessary. Where expert reviewers are engaged, their feedback should not replicate the format of a peer-review of a journal article, but should rather be focussed on specific questions around risk from the project to the population. Further, OEH officers should be the final decision-makers on whether the key policy criteria have been met. Comments that are pedantic and irrelevant to the assessment of risk of a project should be removed from feedback reports - or OEH should specify which comments they want responses to. Excessive time-consuming to and fro discussion should be minimised. This in part can be avoided by the application form being formatted in a way that elicits the key information that is needed.

Hopefully, the proposed changes will mean there will be more time for OEH staff to answer queries from licencees. We have often found it difficult to get in contact with OEH staff in the lead up to trips and during translocations. Being in the field away from base can be very expensive. Unsuccessful trips can come at the cost of further return trips and can result in the failure of projects. Once researchers are in the field, often far from their base, it can sometimes be essential to talk to the responsible staff at OEH with regard to licence conditions. This is particularly the case with translocations where there is imperfect knowledge, and data collected from the field may impact whether or not animals can be collected for translocation or not. The

ability to get timely responses and conditions from the relevant OEH staff can have huge implications for projects and project feasibility. In short, I think licencees should be able to contact OEH staff within office hours when they need to. If the key contact is not available, an alternative contact should be provided who has the mandate to make decisions with regard to conditions. Decisions should be recorded in some way for future reference, because we have found staff turn over has meant previous advice from OEH has not been accepted by successor staff.

In the case of assessment of risk of translocations, it is important that risks of collecting native animals is weighed against the greater good emerging from the project. In particular, how that translocation if successful, might help achieve other threatened species goals in NSW e.g. expanding populations, insurance populations, genetic diversity of new populations, improving ecosystem function, filling research gaps. The consequence of a project ceasing because of delays in the licencing process (for example deadlines for completions of projects and or spending of project funds) should be weighed against the actual risk to the species or local population.