

My responses to the consultation questions are from the perspective of a finch breeder. Our ethos is quite adequately summarised by the president of the Queensland Finch Society with reference to their licencing negotiations.

‘Most of us keep birds for the enjoyment of breeding, improving our lines and occasionally selling a few. We are motivated first and foremost by our enjoyment and the welfare of the birds.’

Invariably we fit into the group that keeps 20 or more birds but, do not consider ourselves as bird dealers. I no longer keep native birds requiring a licence. However, these proposed changes have certainly piqued my interest and I feel if implemented correctly will realise an increase in the number of aviculturists becoming registered, following the processes and breeding native birds.

5. Keeping and dealing licences

Consultation questions

• Do you support the proposed staged approach to implementing a risk-based approach to regulating native animal keeping?

I do support a risk-based approach to record keeping

Under this approach, it is proposed that initially:

- a limited number of native bird, frog and reptile species will be regulated by an approved code of practice and licensing of keepers will be discontinued
- licensing will be retained for other species that currently require a licence, including threatened species considered to be at risk of illegal take from the wild
- no species will be added to the exempt list, and keepers of the 41 bird species currently exempted from licensing will be required to comply with the code of practice.

5.1.3

The “limited number” means what? the species on the Draft Animal keepers species list? – if so I am fully supportive. Otherwise I think the three years will be too long and may result in limited uptake of the process.

• Can you suggest any changes to the draft revised NSW Animal Keepers’ Species List to ensure specific species are subject to the appropriate level of regulation?

I think the list for parrots and finches to be satisfactory.

• Do you have any suggestions for improving the animal welfare and record keeping requirements in the draft codes of practice?

These requirements are satisfactory; however, all information must be acceptable to the entire community, please see below.

• Do you support a risk-based approach to annual records for licensed keepers including simplified returns for Class 1 and advanced keepers, but retention of current animal record book requirements for keepers of venomous snakes?

I think the risk-based approach is an excellent proposal.

The main issue I see is compliance and community uptake. The current system really feels like an impediment to an individuals' animal keeping procedures.

To support and monitor these initial changes, OEH will work with key stakeholders to:

• develop new community education programs for native animal keepers and the community generally to promote voluntary compliance with the conservation and animal welfare objectives of the risk-based approach

When adopting this system, I think it is important have all the relevant information in a highly organised and accessible web page. It must be available to all members of the respective animal keeping communities and by this, I mean all literacy levels and as many media preferences as possible.

To address literacy levels – using the information found in the [NSW Animal Welfare Code of Practice No 4 - Keeping and Trading of Birds](#) which is all good and useful information, is a wall of text and will be inaccessible to those with literacy issues. At the minimum an option to have that information read aloud would be useful. A more useful solution could involve embedding a series of short videos demonstrating the required elements of best practice and the voice over highlighting these and when necessary explaining why they are best practice.

The media preference is more difficult is more difficult to make equitable in a realistically cost-effective manner. Much of the population is comfortable with electronic media, however, some are not and a paper copy of material will be required. This would mean that they would not have access to the resources mentioned above, however they must receive a paper copy of the welfare code if they request one.

Regarding record keeping- again trying to develop uptake within the community, I think any record keeping should involve the methods available now – paper, computer based but also include an opportunity for a phone based app using drag and drop approaches.

Also available to the user would be a few scenarios and a subsequent screen capture video accompanied by an explanatory video demonstrating how to complete the record keeping procedure for each of the media mentioned above.

Overall if the actual website is perceived as a readily accessible, worthwhile resource and something worth visiting rather than a lobby to ensure compliance, then people may become more invested in the process. Once signed on as a 'keeper' especial using digital means a link could be provided to get the user to the correct URL to get them started.

5.2 Dealer licences

Consultation questions

- **Do you support the retention of licensing for pet shops that sell native animals and expanding the list of species they may sell?**

Yes

- **Should licensing also be required for persons undertaking the business of selling native animals over the internet or from their homes?**

It is very difficult to discriminate between those individuals who are bona-fide dealers and hobbyists. Not all brick and mortar pet shops keep native animals and it can be difficult to source required stock. The internet and social media provide a networking mechanism.

Overall, no they shouldn't need licensing.

- **If so, what criteria should be applied to identify where online and home-based breeding and dealing is undertaken as a business, rather than incidental to keeping native animals as a hobby?**

5.3 Interstate import and export licences

Consultation questions

- **Do you support the retention of import and export licences to monitor interstate movements of native animals?**

I do support it for high risk species that are vulnerable to trapping.

- **Should lower risk species be exempted from licensing, such as species regulated by a code of practice?**

Yes, in conforming with the principles implied in the code of practice, having to comply with state import export licences is extra administration.

- **Should import and export licences be discontinued for interstate movements of animals kept by zoos, wildlife parks and tourist attractions?**

I would only keep them for those species vulnerable to being poached

7. Licence fees

Consultation questions

- **Do you have any comments on the proposed principles for determining licence fees?**

The animal keeper licences seem reasonable as described in the document.

- **Do you have any suggestions to improve fairness and equity in setting licence fees?**

I agree with the rate reduction for pensioners.

Another consideration for a reduction could be for those individuals who can guarantee they are breeding non-mutation native organisms. I am primarily referring

to birds, but the principle can apply to other natives as well. In particular with regard to Gouldian finches some parrot species.

The second idea concerns two species extinct from NSW. The Star Finch *Neochmia ruficauda ruficauda* and the Black Throated Finch *Poephila cincta cincta*

The [Species Profile and Threats database](#) quotes the Black-throated Finch Recovery Team (2004) 'recommended that a captive breeding population be established and that sites for the re-introduction of the subspecies be identified'

The establishment of a suitably sustainable population of 1 thousand to 1500 individuals would be extremely expensive.(G Fitt pers. comm). If aviculturists were encouraged to develop a large population of this species over a period of time, then the need embark on a large scale breeding program would be nullified. A small reduction in the fees for those individuals who have indicated they would undertake the process might work.

The star finch mentioned above is endangered in Queensland. A similar plan may work for this species as well. The other race of Star Finch *N r clarescens* is a much more boldly coloured bird and attracts aviculturists more readily. A small monetary incentive may be useful in maintaining the genetics of the eastern subspecies, and if ever possible, allow a reintroduction.

In terms of fee reduction, I am considering a nominal amount e.g. \$2 per species.