

Preface

The purpose of this review is to assess & provide feedback on the proposed changes by the Office of Environment & Heritage towards a risk-based approach to native wildlife licences. The opinions expressed within are wholly of the author & any reference to individuals or collectives, whether they be organisational or governmental, are based from opinion only unless otherwise referenced

Chapter 1: Introduction

1.1.1 Proposed Codes of Practice

The first point that we must examination is, for me, a crucial one: The exclusion of a draft code of practice for keeping native mammals.

It is important to note that DELWP (Department of Environment, Land, Water & Planning) have legalised the keeping of a total of 31 species of native mammals & marsupials including a variety of possums, macropods, dasyurids & rodents in Victoria. This includes, as an example, the endangered Eastern Quoll (*Dasyurus viverrinus*) which has a declining wild population as listed by the IUCN Redlist. These are licensed in a tiered system similar to reptile keeping in NSW. Other states that currently allow the keeping of native mammals include South Australia & the Northern Territory. For NSW to not consider a proposal & licencing system to keep native mammals is both irresponsible in regards of land & fauna management and draconian.

If we take *Asphidites ramsayi* as an example, the keeping of endangered, vulnerable or threatened native species can be of great benefit to the success of the species as a whole. Captive keeping & breeding can lead to an increase in species numbers & increased education of these animals amongst members of the public. If the logic could be applied to native mammals, we may very well find the dangers faced by the Eastern Quoll, and species similar to it, are lessened. Furthermore, this would go someone to addressing the illegal trade of native mammals in Australia, which contributes 3% of all illegal wildlife trades (Australian Customs Wildlife Protections Database 1994-2007).

Chapter 2: Threatened Species Licences

Consultation Question 1: Should licensing be retained for all activities currently requiring a threatened species licence?

Licensing should definitely be retained for all activities currently requiring a threatened species licence. The use of a code of practice diminishes the potential repercussions for those that do not comply with the practice. In addition to these, the majority of the cases presented in table 2 are from commercial organisations that seek to disrupt native wildlife either A for profit or B for civil works providing services to local residents. In no way is the installation of the NBN to be considered an essential service that should proceed through a code of practice rather than licensing. In addition, any licence application that is received from a business or company entity should have heavy application & processing fees. This will go a long way to compensating & reinvesting in the native wildlife that is disturbed in the process.

Chapter 3: Wildlife Trade Management Licences

Consultation Question: Can you suggest any improvements to emu farming licence conditions?

The only improvement I can suggest is having individual animals tagged and/or marked & developing a registry similar to cattle farming. This would mitigate the risks of wild animals being traded as all captive animals would be tagged, microchipped etc. Effectively, if this step were to be incorporated, the impact on native populations would be nil.

Chapter 4: Damage Mitigation Licences

Consultation Question: Can you suggest any improvements to standard conditions of a landholder's licence to harm?

The licence application should include a targeted measurement of population levels on the property rather than an estimate. This should also be conducted by a person/s not affiliated with land owner. Currently, there is a significant chance that any information presented on a licence application in regards to population numbers, impact to the existing population & the extent of the damage may be incorrect, deliberately or otherwise.

The expiry date of a landowner's licence to harm should not extend to 12-months. This should either be limited to 3-months upon which they can apply for an extension if they can prove that management practices have not been effective so far or they should be approved on an instance basis e.g. authority to remove 20 animals in a single instance.

Consultation Question: Should licensing for reptile handlers be retained?

Licensing for reptile handlers should be designed not only to minimise the potential for risk to the handler themselves & members of the public, but should also improve the chances for survival of the animal & allow greater education of the public

Application criteria should be stricter, with written references coming from individuals whom they have known for an extended period of time (24 month minimum). The validation of their experience should not come as a result of completing a two-day course that would deem them adept or proficient at capturing wild animals. It is also prudent not to forget to distinguish between experience with captive, venomous animals & wild animals.

In addition to this, the suggestion that the release radius should be within 20km of the capture site is ludicrous. Multiple studies conducted by Professor Rick Shine over the last decade have demonstrated that translocation over a distance greater than 1km is highly ineffective, with a successful survival rate of <5% when tracked up to 6 months later.

Chapter 5: Keeping & Dealing Licences

The requirement for any animal expo to have a dealer's licence is counterintuitive. The ultimate goal of OEH should be to encourage & support sustainable, compliant native animal keeping. These events are largely run by not-for-profit organisations or committees for the benefit of their members & community

The existing licensing and registration conditions are strongly enforced at all of these events and have been forever without any issues. Even the consideration of moving some of these species to a code-based structure will not cause a deviation from this. The expectation would be the person/s entering animals for sale will have the correct licensing (or code) category displayed & readily available for any potential buyers.

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

Over management & licensing will only deter people from keeping native animals as a hobby. The argument that selling native animals online or from home will result in poor animal welfare is a fair one however, this does not apply to licensing for business'. If individual/s were to go to the effort of breeding a substantial number of animals for sale, they are likely use good animal welfare practices. Additionally, a hobbyist breeding native animals is far more likely to be informed & caring about the animals they have rather than a pet shop whose sole purpose is to make money. Quite often, the animals in pet shops are cared for by casual staff who are not experienced in effective animal welfare practices. Private animal keepers are a prime source of information on husbandry requirements and historically, have managed these better than any government organisation. You need to look no further than the resurgence of broadhead snakes in captivity to realise this.

If OEH were to consult with private breeders, you would quickly realise that they do not make money. Quite often they work full-time jobs & breed native animals as a hobby. The sale of these animals is used to recoup expenses associated with their care e.g. feed, electricity etc. Enforcing licencing for the online sale of animals will destroy the hobby. Additionally, the generation of business/money from animal sales is the concern of the ATO, not OEH. The funding used to investigate & concern themselves with these matters could be better spent elsewhere.

Draft Code of Practice- All Animals

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With regards to following the standards outlined in the code of practice, I agree that veterinary advice is an acceptable exemption from the code HOWEVER, evidence of these recommendations should be provided upon request. This could be a receipt, letter, tax invoice etc that explicitly states the instructions.

Acquisition & Disposal- 3.1.5.

I think this specific point requires further clarification. Does this exclude facebook, gumtree etc? if so, why? These are the most common means of acquiring animals for the casual hobbyist. I fear that making the process of purchasing or selling birds more difficult will diminish interest in the hobby

This whole third section requires greater clarification. For example, purchasing & selling birds as a business. Business should be defined at the beginning of the document. How many animals classify as a business? Does a backyard breeder of budgies require a licence to sell? What if it is only 2 animals?

In the whole I think the code of practice is well structured & effective, but it needs to be further developed with regards to clarifying some of the finer points.

Record Keeping 4.2.2

Microchipping should not be the only method of registering/tracking bird ownership. Foot rings, common to pigeon hobbyists, would also be an effective means, especially for juvenile birds as these can often be applied earlier than microchips & are less invasive

Proposed Changes to Reptile Licencing

Species	Current Class	New Class	Reason
All Antaresia	R1	Code	Currently proposed but should include hybrids
All Cacophis	R1	R2	Difficult to feed, mildly venomous.

All Boiga	R1	R2	Difficult to feed, fast animal often handles poorly,
Yellow-faced whip snake	R1	R2 (minimum. Possibly R3)	Large, mildly venomous animal. Irresponsible to allow an R1 keeper to keep
Green Tree Snake	R1	R2	Same as Boiga
De vis banded	R1	R2	Difficult to keep, mildly venomous
All Drysdalia	R1	R2	As with Cacophis
Orange/Red/black Naped/	R1	R2	As with Cacophis
Marsh Snake	R1	R2	As with Cacophis
All Liasis	R1	R2	Size of animal presents health risk
Liasis stimsoni	R1	NA	This animal doesn't exist
Diamond python & hybrids	R1	Code	Basic animal to keep. UV requirements are not hard to meet
Slatey-grey Snake	R1	R2	As with Boiga
Rough-scaled python	R2	R1	Becoming a common animal in captivity. Basic care requirements
All Hoplo's	R3	R4	Dramatic venom effects, combined with rarity of sub-species
All Austrelaps	R4	R3	Venom effects not as pronounced. Low-yielding animal
Western Desert Taipan	NA	R5	New species.
All Tiligua (excl blue-tongue)	R2	R1	Care requirements are not extreme.

In addition to the above, the suggested additions from other members of the community to add the three new species of death adder onto an R5 licence should be heavily considered. The only reason I foresee these animals needing to be placed on an R5 licence is local variation in venom resulting in ineffective antivenin. This would need to be demonstrated and requires expertise outside of NPWs or OEH.

Proposed Mammal Licencing

Species	Current Class	New Class	Reason
Brushtail Possum	NA	M1	Common animal with easy care requirements
Ringtail Possum	NA	M1	As Above
Sugar Glider	NA	Code	Small, easy to care for animal
Feathertail Glider	NA	M1	Slightly more difficult care requirements than sugar gliders
Squirrel Glider	NA	M1	As Above
Quokka	NA	M1	Difficulty to legally acquire, endangered
Tasmanian, red-necked, red-legged Pademelons	NA	Code	Small, easy to care for macropods
Swamp, Tammar wallaby	NA	M1	Easy to care for but need reasonable sized yard
Eastern, Western Grey, red & Kangaroo Island Kangaroo	NA	M2	Large, potentially dangerous macropod
Dunnart	NA	Code	Easy to care for dasyurid
Spinifex Hopping Mice	M1	Code	Easy to care for
Plains Mice	M1	Code	As above
Common Wombat	NA	M1	Heavy investment required into an escape-proof yard/enclosure
Eastern Quoll	NA	M2	Nocturnal & timid animal that does handle well