

S00162 – Cindy Jackson

Jetty Pets

Our submission for changes to the Office of Environment and Heritage Wildlife Licensing Reforms 2018.

Since the release of the licensing Reforms review, we have received overwhelming responses from our customers that are looking forward to some of the changes to the licensing system and some also shared concerns.

After many discussions with colleagues from the Reptile keeping community, the herpetological societies and fellow Fauna Dealer licensees. Some extremely passionate points of view have been thrown around.

Thank you for the opportunity to respond to the changes the OEH are proposing and we look forward to future consultation. We have only commented on areas that are applicable to us.

5. Animal keeper License

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

Jetty Pets supports a risk- based approach to regulating native animal keeping. There are many species which could be added to the coded lists of reptiles and amphibians using this low risk approach. Increasing this list will free up the record keeping for both the OEH and keepers.

- 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? .

We have concern's there are a number of amphibian species to be removed from licensing altogether. Making species prohibited means there is a risk of losing the opportunity for future captive collections albeit amateur or professional. We would like consideration that these species remain on the NSW species list.

In addition to retaining prohibited species, we would like consideration for some species to move from class 2 down to class 1 using the low risk approach. Green and Gold Bell frogs -*Litoria aurea* have been bred and kept successfully in captive collection's not only in nsw but in other states. In captivity these frogs are extremely easy to maintain, keep even breed. They are endangered in wild population's but this iconic amphibian, would be a sort after species for amateur keepers and a low risk species to make available for all.

Southern Bell frog – *Litoria reniformis*

Stuttering Bell frog – *Mixophyes balbus*

Giant barred frog – *Mixophyes iterates*

Great barred frog – *Mixophyes fasciolatus*

Orange thighed frog – *Litoria xanthomera*

All of the above species are kept in private collections and easily bred, future progeny would be available for keepers to obtain. We believe that encouraging the keeping of species already in private collections and making the commonly bred species obtainable with less restriction will in turn protect the wild populations and reduce the illegal activity of taking from the wild.

Rough frog –*Cyclorana verucosa*

Pearson's green tree frog – *Litoria pearsoniana*

Whirring tree frog – *Litoria revelata*

Great barred frog – *Mixophes fasciolatus*

Crucifix frog – *Notaden bennetti*

Haswell's froglet – *Paracrinia haswelli*

Brown toadlet – *Pseudophryne coriacea*

Red backed toadlet – *Pseudophryne coriacea*

Southern toadlet – *Pseudophryne dendyi*

All of these species were proposed by F.A.T.S to be down graded from class 2 to class 1 but this has either been an error or overlooked as no change has been made in the draft.

There are a number of Reptile species that could be down graded from class 2 to class 1 and some sub-species included in the species list that aren't currently included.

Gecko's –

Kristins Gecko- *Strophurus krisalys* should be added to the species list, this species has been kept in many collection and listen as *Strophurus ciliaris* if added to the list it would prevent hybridising this species.

Western spiny Tailed gecko –*Strophurus strophurus* is very common in queensland collections like all strophurus species they would make rewarding pets and very easy to keep and breed and should be added to the list.

Ranges stone gecko's - *Diplodactylus furcosus* this species should be added to the list, it has been kept under *Diplodactylus granariensis*

Helmeted gecko –*Diplodactylus galeatus*

Wheatbelt stone gecko –*Diplodactylus granariensis*

Western spiny tailed gecko – *Strophurus spinigerus*

Dotted velvet gecko *Oedura gemmata*

The four species above should be down graded from class 2 to class 1. All easy to keep/breed their housing and dietary needs are very basic and can be achieved by any keeper. Large numbers are being bred so supply wouldn't be an issue for keepers to obtain.

Snakes –

Rough scaled python – *Spilota carinata* should be down graded from class 2 to class 1. Cindy spent 7 years working with this species they are extremely easy to keep, the wild population's are very limited but in captivity there are many, the housing and husbandry requirements can be met easily by a 12 yr old. They are easy to breed. However the genetic pool is incredibly limited as only 6 founder animals were obtained to supply captive numbers. These snakes would benefit from a wider keeper base.

- 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?

We support the risk based approach and simplified returns for class 1 and advanced keepers. The current record book requirements for venomous keepers should be retained.

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

We strongly support the retention of licensing for pet shops that sell native animals and expanding the list they may sell. Most of the FDL's have more than qualified staff to maintain and sell many species of reptile, amphibian and even mammal species.

We strongly suggest all coded reptile and amphibian species added to the list and all class 1 species of reptile added. Class 2 species should also be considered if the staff have the necessary experience to keep these animals they should also be allowed to be traded too. Jetty pets has 4 staff and we are all family. Between us we have kept and bred over 50 species of reptile and amphibians privately over the past 20yrs . Our whole family keep and have bred successfully for many years and would like the opportunity to share our hobby and knowledge with our customer's. We answer husbandry, keeping and breeding questions daily about many species not just the 15 we have currently. Show casing them in store would be great.

There is currently 5 amphibian species you are looking at allowing FDL's to trade in. whilst we believe all coded species should be for sale through fauna dealers the same as reptiles. If using the risk assessment tool shows them to be low risk we don't understand why they can't be offered.

We would like consideration for these species to be added to the list for sale

Peron's tree frogs – *Litoria peronii*

Striped marsh frog – *Limnodynastes peronii*

Dainty green tree frog – *Litoria gracilentia*

White lipped tree frog – *Litoria infrafrenata*

Desert tree frogs – *Litoria rubella*

Eastern banjo frog – *Limnodynastes dumerilii*

All of these species do come into F.A.T.S on a regular basis and are offered out for re-homing, there are many already in captive collections. All of these species are of low risk, if realised or escaped wouldn't survive, or out compete the local population's. Those out of area species would have a very unlikely survival rate.

- Can you suggest any changes or improvements to the licence conditions for licensed dealers and expos?

The only changes we would suggest for Expos is to allow the dealers to display their animals under the same conditions as all other keepers attending the event. Following the code of practice we should also be allowed to display our animals for sale in smaller non blacked out enclosures like everyone else.

Improvements to our licence conditions -, removing the clause we must accept an animal we have sold returned to us for life. It should be only until a reasonable amount of time has past.

After the sale of the animal, there is no way of Knowing it is the same animal. No control over the health and wellbeing of that animal lies with us after it has left our store, it is entirely up to the person purchasing the animal and no matter ho much we explain or hand out information what they do is not always ideal. Disease risk is extremely high and the integrity of our collections maybe compromised. Veterinarian experts have told of cases where even after 3 years an animal that tested positive for sunshine virus had no symptoms that could be detected.

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

Yes anyone conducting a business to sell native animals from their home should be licensed. They should be subject to the same licence condition as a fauna dealer. However making it very clear that they cannot buy and sell animals the same as a dealer can. The 6-month period from acquisition to disposal must remain in place. The licence fee should be fair.

- 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?

Criteria should be

Having an ABN number

A separate bank account

Website

Face book business page

Paying for advertising on commercial business websites eg. Pet pages

Selling animals to the same AKL number over 10 times a year.

Selling reptile products as well as animals from the same premises.

Repeated “for sales” advertisements within a short period of time.

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

No. Other states just provide a movement advice at no cost to the keeper sending or receiving.

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

Low risk species should not require an import or export licence

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

Yes they should be discontinued.

Thank you for the chance to respond to your proposals

Good luck with the changes we hope they are going to be implemented swiftly once all changes are finalised.