

S00153 – Clinton Herring

To Whom It May Concern: Ecolab Pest Elimination has noted the recent changes to the Biodiversity Conservation Act 2016 (commenced 25th August 2017) and, as a supplier of professional pest management services to the public and commercial industries, wishes to make the below submissions to the public consultation into proposed changes to wildlife licensing.

1. Catch and Release Licenses a. whether licensing for possum relocation should be replaced by a BC Act code of practice that incorporates the minimum standards in OEH's possum management policy

Ecolab fully supports OEH's Possum Management Policy and believes this is a practical and attainable way for professional pest management organizations to manage possum activity. Consequently, Ecolab is supportive of any initiative for the development of a recognized Code of Practice based on the current possum management policy as a means to replace the current licensing requirements, as we believe this will improve both awareness of safe and humane possum management practices and, concomitantly, compliance with such requirements.

It is also our position that industry involvement and consultation be undertaken in the development of any proposed Code of Practice and, to this end, Ecolab advocates that the OEH liaise with the professional body for professional pest managers in Australia: the Australian Environmental Pest Managers Association ('AEPMA'). Ecolab is similarly obliged to offer our time and expertise where appropriate should industry input and/or feedback be sought on any aspects of a proposed Code of Practice.

2. Protected Animal Damage Mitigation Licenses

a. whether codes of practice should be developed for harming native birds at airports, public parks and grain silos as an alternative to licensing Ecolab is supportive of Codes of Practice being developed as an alternative to licensing for the harming of native birds under specific circumstances, where those circumstances occur regularly, are established as posing a threat to public safety or public health, and require an immediate response (e.g. airports, public parks, and grain silos as suggested in the Discussion Paper).

However, Ecolab further advocates that consideration also be given to the need to harm native birds for the protection and integrity of food safety, with particular

reference to native birds that ingress into food processing establishments. To this end, Ecolab submits that food processing establishments must be considered in line with airports, public parks, and grain silos as an environment, or situation, whereby an immediate response is typically required in order to maintain food safety. As such a Code of Practice devoted to, or inclusive of, food processing establishments would fulfil a market need as an alternative to licensing such that professional pest management suppliers are able to undertake immediate harm of any trapped or ingressing birds.

Similar to our submission 1a (above), Ecolab proposes that industry involvement and consultation be undertaken in the development of any proposed Code of Practice. As also noted above, Ecolab advocates that the OEH liaise with AEPMA on this matter. Ecolab is similarly obliged to offer our time and expertise where appropriate should industry input or feedback be sought on any aspects of a proposed Code of Practice.

Ecolab wishes to record our appreciation in being able to provide this submission into wildlife licensing in NSW, and looks forward to providing further stakeholder input where appropriate in the future.