

S00155 – John Mostyn

Thank you for allowing me to comment on the proposed changes to Wildlife Licensing. The following are my submissions and each part or section is noted.

4.2 Landholder's licence to harm

Consultation questions

- Should all nominated shooters be listed on the landholder's licence to harm, rather than issuing nominated shooters a separate licence to harm, to reduce administrative effort?
- Can you suggest any improvements to standard conditions of a landholder's licence to harm?

The following are excerpts taken from Queensland Code of Practice for the Welfare of Wild Animals Affected by Land-Clearing and Other Habitat Impacts and Wildlife Spotter/Catchers:

1.2 Wildlife loss associated with land-clearing

The clearing of native vegetation, whether remnant or regrowth, represents the most significant cause of mortality of wildlife in Queensland. Based on land clearing rates in the state during 1997- 1999, an estimated 100 million native mammals, birds and reptiles died yearly as a result of broad- scale clearing of remnant native vegetation¹. That study did not seek to estimate wildlife loss associated with clearing of non-remnant (regrowth) vegetation, which suggests that the combined total may be significantly higher.

Land-clearing may also isolate populations or individuals in pockets of habitat, leaving them susceptible to misadventure, urbanisation edge effects, natural disasters, overpopulation, genetic degradation through inbreeding, and a range of other deleterious effects.

The concept of "extinction debt" relates to the likelihood of species extinctions sometime in the future as a result of passing a threshold of habitat loss and/or impact². Extinction of rare species from habitat fragments in Queensland has been documented as occurring rapidly from small fragments or more slowly (over decades) from larger habitat fragments^{3,4}.

1.3 Animal welfare issues associated with land-clearing

Aside from the long-term ecological consequences of such a massive loss of wildlife, there are serious animal welfare issues associated with the methods used in the

clearing of vegetation while animals are present. Although some animals may be killed instantaneously, it is likely that a much larger proportion suffer painful, distressing or prolonged deaths. Furthermore, displaced animals that survive the process of clearing may be subject to misadventure, motor vehicle trauma, starvation or attack by other animals or predators.

1.3.1 Animal injuries associated with land-clearing

Animals injured directly in the process of vegetation clearing generally suffer from major crushing, deceleration or fall related injuries. Arboreal species may suffer from trauma associated with falling from a tree and/or crushing and avulsive injuries associated with boughs falling on or beside them. Such injuries include severe internal bleeding and organ disruption, multiple bone breaks, eye and head injuries. Animals resting in hollows, similarly, may receive crushing injuries if the hollow bough disintegrates, or suffer internal organ injuries and tearing as a result of rapid deceleration (deceleration injury).

Ground dwelling animals, such as bandicoots, echidnas, snakes and lizards most commonly suffer from crushing and avulsive injuries (such as traumatic limb amputation), or may be buried alive during earthworks.

Highly mobile species such as birds and macropods may avoid direct injury by machinery, but may suffer injuries by running into fences, motor vehicle strike or other misadventure.

Injuries suffered by animals during land-clearing vary from mild to severe and fatal, but these animals are only rarely presented to wildlife hospitals or shelters. This is primarily because they are less likely to be discovered by members of the community and are more usually buried or confined in piles of debris during the process of clearing, which are then subsequently burnt or chipped.

1.3.2 Misadventure and starvation associated with land-clearing

Animals that survive the process of land-clearing may succumb later to starvation, predation, territorial aggression, misadventure (such as drowning in swimming pools, entanglement in fences, and the like) domestic animal attack, motor vehicle strike and maladaptation to new habitat. A small proportion of animals may disperse to adjacent habitat with little ill-effect, but, contrary to popular belief, the proportion of animals successfully doing this is likely to be small.

1.3.3 Isolation of wildlife and habitat fragmentation

Developments or land-clearing that result in destruction or diminishment of habitat corridors or loss of habitat connectivity may result in reduction or loss of the ability of individuals of a species to disperse from the isolated habitat fragment. This may lead to loss of wildlife through overpopulation and starvation, misadventure during dispersal attempts, and loss of individuals through edge effects (such as domestic animal attack), as well as marked diminishment of ecological values generally. Wildlife populations isolated by loss of corridors present larger and more complex management problems for future developments impinging on the remaining habitat, or alternatively may reach a critical population density at which mass mortality occurs, or causes human-animal conflict issues for surrounding communities.

Removal of wildlife prior to land-clearing and ecofriendly development

The removal of wildlife from sites shortly prior to, and during vegetation clearing represents the most proximate mechanism for reducing wildlife injury and mortality associated with land clearing. This requires the use of personnel skilled in the detection and removal of wildlife from vegetation and other terrestrial habitats, and the

adoption of protocols and procedures for the humane handling, housing and disposition of wildlife following removal from their habitats.

The application of ecologically sound design and planning principles to proposed developments represents the most important method of reducing and minimising adverse impacts on wildlife and the ecological values of habitat remnants. These principles should be rigorously applied to all development proposals at an early stage in planning to minimise the requirement for expensive (and less desirable) wildlife and habitat management alternatives, some which are detailed in this code. It is important that all parties involved in urban and rural planning and development projects attempt to adhere to ecologically sound and sustainable development principles.

Due to the wildlife loss associated with land clearing (as listed above), I would like to suggest the following improvements to standard conditions of a landholder's licence to harm:

- Developers and all Development Approvals within NSW should be required to have Fauna Spotter Catchers to provide pre-clearance and/or during clearance management of native animals, to minimise the impact on wildlife from land clearing.
- NPWS/OEH and Councils should ensure the use of Fauna spotter/catchers in all necessary new developments of land clearing.
- Land Holder's Licences should be subject to similar conditions as Catch and Release Licences.
- All Fauna Spotter Catchers within NSW should follow a Code of Practice, similar to that of the Queensland Code of Practice – For the Welfare of Wild Animals Affected by Land Clearing and Other Habitat Impacts and Wildlife Spotter/Catchers.

4.4 Catch and release reptiles

Consultation questions

- Should licensing for reptile handlers be retained?

- How can licence eligibility criteria and licence conditions be improved to ensure licensed handlers have the competency and knowledge to safely catch and relocate reptiles?
- Should licensing for reptile handlers be retained?

General Licenses – Catch & Release Reptile Licenses should be retained to ensure suitably qualified people are legally allowed to catch and release reptiles from residential and commercial properties, as per the Biodiversity Conservation Act 2016.

- How can licence eligibility criteria and licence conditions be improved to ensure licensed handlers have the competency and knowledge to safely catch and relocate reptiles?

Current Licence Requirements as per OEH Website

Licence requirements

Applicants for a catch and release reptile licence need to apply to OEH and demonstrate and/or provide:

- they are 18 years or over in age
 - why a licence should be granted and describe the location/area where they will operate
 - 2 written references from people who can validate their ability and experience
 - they hold a current first aid certificate, public liability insurance
 - evidence that you have completed a recognised reptile handling course or have at least 2 years proven experience in handling venomous snakes.
- This can be improved by ensuring point 5 (evidence that you have completed a recognised reptile handling course or have at least 2 years proven experience in handling venomous snakes.). At the moment although it is a requirement to complete a recognised training course, OEH do not endorse or recognise any approved venomous reptile handling training courses. If a person was wishing to apply for a Catch & Release Licence, OEH do not currently provide a list of approved venomous reptile trainers, either verbally or electronically.

OEH could improve the approved list of venomous reptile handling training courses by adopting the methods currently in use by Department of Environment and Heritage Protection Queensland. EHP display a list of approved wildlife training providers on their website, for potential trainees and the general public, to view and select an approved trainer. Please see link and list of approved wildlife training providers provided by EHP below.

<https://www.ehp.qld.gov.au/licences-permits/plants-animals/documents/wildlife-training-providers.pdf>

Notice

Wildlife management

Department of Environment and Heritage Protection approved wildlife training providers

If you wish to be considered as an approved wildlife training provider please contact wildlife.management@ehp.qld.gov.au for consideration.

COMMERCIAL WILDLIFE LICENCE

Commercial wildlife licence (training for staff that operate a pet shop that sells reptiles)

Approved service providers			
Name	Phone	Mobile	Webpage
Cool Companions	(07) 3814 0100		www.coolcompanions.com.au
Gecko Wildlife Presentations	(07) 328 94709	0411 119 787	www.geckoeswildlife.com.au

REPTILE DAMAGE MITIGATION PERMIT

Damage mitigation permit (removal and relocation) for people wishing to operate as a reptile relocater

Approved venomous reptile training providers:			
Name	Phone	Mobile	Webpage
Educational Reptile Displays (ERD)		0413 128 248	www.educationalreptiledisplays.com.au
Mr Sean McCarthy		0418 809 797	www.snakehandler.com.au
Mr Geoff Coombe		0408 108 508	www.livingwithwildlife.net
Cool Companions	(07) 3814 0100		www.coolcompanions.com.au
Gecko Wildlife Presentations	(07) 328 94709	0411 119 787	www.geckoeswildlife.com.au
Blackadder Reptiles		0419 788 167	www.blackadderreptiles.com
Mr Ray Wallbank		0410 774 924	www.ermq.com.au

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Department of Environment and Heritage Protection approved wildlife training providers

Approved venomous reptile training providers:			
Name	Phone	Mobile	Webpage
Educational Reptile Displays (ERD)		0413 128 248	www.educationalreptiledisplays.com.au
Ranger Dan and Jackie Hands on Wildlife		0437 056 156 0437 056 157	www.handsonwildlife.com.au
Mr David Manning Animal Ark Pty Ltd	(08) 9243 3044	0466 688 188	www.animalark.com.au
Mr Scott Eipper Nature 4 You		0419 328 251	www.wildlifedemonstrations.com
Mr David Williams Reptile Education & Safety Training Australia	(07) 4157 2948		www.resta.com.au
Mr Brian Bush Snakes Harmful & Harmless	(08) 9295 3007	0429 707 479	www.wa-snakes.com.au
Mr Max Jackson Australian Wildlife Encounters		0477 040 037 0407 785 892	www.australianwildlifeencounters.com.au
Mr Raymond Hoser	(03) 9812 3322	0412 777 211	www.raymondhoser.com
Mr Craig Adams Snake and Spider Safety Awareness for Employees (SSSAFE)		0409 786 659	www.sssafe.com.au
Mr Ronald Burrell Snake Catchers Adelaide		0413 511 440	www.snakecatchersadelaide.com.au
Mr John Mostyn John's Reptile Awareness Displays		0416 922 282	www.jmvenomoussnakes.com.au
Mr Euan John Edwards Elapid Environmental		0432 470 448	http://elapidenviro.com.au/

Version history

Version	Effective date	Comments
1.00	17 August 2016	Approved by Director, Wildlife Management.
1.01	25 October 2016	New provider added to list
1.02	16 March 2017	Updated provider information

Notice

Department of Environment and Heritage Protection approved wildlife training providers

1.03	14 August 2017	New provider added to list and updated provider information
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EHP maintain a list of 'approved' venomous reptile training providers whose standard of training are considered to meet certain minimum requirements. This initiative is a) is to ensure training of people who will be handling venomous reptiles will consistently be to a higher standard and b) facilitate the processing of relevant permits for applicants who have successfully completed a course by an approved training provider.

The assessment process for 'approved' venomous reptile training providers involves training providers addressing a list of 'performance criteria' which EHP consider are important by providing a brief written summary of how each key competency component is incorporated into the training courses which they provide. Further documentation, including copy of state government licences/permits which authorise venomous snake training, public liability insurance and any other training or qualifications that may be relevant eg. Cert IV in training, must also be provided to EHP. Whilst EHP note, these listed documents are not part of EHP Business, they do demonstrate that the training provider is appropriately authorised and the high standards to which they are operating.

Please see email from DEHP and the list of 'performance criteria' training providers need to address.

As per our discussion, we (Department of Environment and Heritage Protection (EHP)) are now maintaining a list of 'approved' venomous reptile training providers whose standard of training are considered to meet certain minimum requirements. The objective of this initiative is a) to ensure training of people who will be handling venomous reptiles will consistently be to a higher standard, and b) facilitate the processing of relevant permits for applicants who have successfully completed a course by an approved training provider.

The assessment process involves training providers addressing a list of 'performance criteria' which we consider are important by providing a brief written summary of how each key competency component is incorporated into the training courses which they provide.

EHP would like to collect this information from you and subsequently include your company on our list of approved venomous reptile training providers in Queensland. I appreciate this will take some time and effort on your part, but should point out the advantage in becoming an approved training provider is that any certificates received by EHP from permit or licence applicants who have completed your training would be recognised as coming from an approved training provider and the permit applications should be processed without delay.

I have attached a Word document which can be edited which lists the elements of competency and performance criteria which need to be addressed. Could I suggest you enter some brief notes under each performance criteria listed describing how your course incorporates these criteria into the training which you provide. I would invite you to forward your completed response directly to me by return e-mail.

Please note: We need to be able to understand from your responses how you incorporate each performance criteria into your training, not simply that you do so.

Also, I would be grateful if you are able to forward me copies of any other documentation that you think might be relevant such as:

- i) Copy of state government licences/permits which authorise your venomous snake training;
- ii) Public liability insurance;
- iii) Any other training or qualifications that you think might be relevant eg. Cert IV in training.

While these listed documents are not part of EHP business, they do demonstrate that the training provider is appropriately authorised and the high standards to which they are operating.

Note: the reason I have contacted you at this time is that we have received a wildlife permit application based on a Certificate provided by a person who completed your training earlier this year. We need to know more about the training which you provide before we can approve the relevant permit based on your certificate.

Once we have received completed documentation from you and it includes all the information that we require, your training can generally be approved with minimal delay.

You are very welcome to contact me directly if you have any questions.

Thanks,

Jeff.



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(Company)

(Licence holder)

Elements of Competency

1. Care of reptiles

Performance criteria

1.1 Capture and restraint in conducted in a humane way.

1.2 Recognise the signs and symptoms of disease in reptiles.

1.3 Reptiles are monitored for indicators of injury or stress.

1.5 Appropriate treatment or veterinary attention provided for ill reptiles.

2. Identify reptiles

2.1 Species of reptile are able to be identified.

3. Safe handling of reptiles.

3.1 Capture and restraint are conducted in a safe way.

3.2 The capture and restraint techniques is species appropriate.

3.3 Safe handling of large pythons

3.4 Safe handling of a range of venomous species.

3.5 Safe handling of large monitors.

4. Knowledge of biology and behaviour

4.1 Behavioural and physiological requirements of reptiles identified.

4.2 Species specific preferred body temperatures and photoperiod requirements understood and incorporated in capture.

4.3 Interspecific and conspecific agnostic behaviour recognised and managed.

4.4 Appropriate release habitat can be identified.

4.5 Release takes into account species specific biology and behaviour.

5. Knowledge of species specific transport requirements

5.1 Species appropriate containers are identified and utilised for transport

5.2 Venomous snakes are secured* during transport

5.3 During transport containers are to be appropriately labelled

6. Workplace health and safety

6.1 Access restricted to appropriately trained personnel

6.2 Completed a first aid course and hold a current certificate

6.3 Uses appropriate catching equipment for the species involved

6.4 To wear appropriate clothing and footwear

OEH could also improve on their current requirements by stipulating all 'approved' training providers must conduct a minimum of 2 days/16 hours training courses to ensure high standards are met for the trainee to be able to safely catch & release venomous reptiles and to be able to identify native and non-native species, endemic and non-endemic to the location/area they will operate in. 'Approved' training providers should teach identification of species by the use of dichotomous keys, teach trainees several different handling techniques and also ensure each performance criteria (as per EHP Elements of Competency) is met within the training course delivered.

The 'approved' training providers must be a DPI licensed exhibitor and the training provider must hold a Cert IV in Workplace Training & Assessing.

Licence eligibility criteria and licence conditions can be improved to ensure licensed handlers have the competency and knowledge to safely catch and relocate reptiles by OEH also adding further requirements to the existing requirements by including the following:

- They must hold a minimum R4 or (Class 2 Category 2) Reptile Keepers Licence. This will ensure the person has the knowledge and skills to meet certain criteria (as per EHP Elements of Competency), as a person with limited knowledge would not have the skills or knowledge to correctly identify if the species is native/exotic/endemic/non-endemic/sick/injured etc.

This is also adopted from South Australian requirements where persons must:

- hold a specialist keep and sell permit and be endorsed to keep venomous snakes (Category 2) or have held venomous snakes (Category 1) species for a minimum of 1 year
- Have secure facilities for housing any captured venomous snakes.
(Adopted from South Australian requirements, to ensure a Catch & Release License Holder has specific holding facilities to accommodate any sick or

- injured reptiles for the holding period of 3 days, as per NSW OEH conditions.)
- Have security arrangements in place for the housing and transportation of venomous snakes (adopted from South Australian requirements).
 - After completing an 'approved' training course, must have actively assisted and can provide evidence in at least 10 snake catching callouts over a period of not more than 12 months, under the supervision with a licensed Catch & Release holder. (This is to ensure the person is competent and has the knowledge and skills to safely catch and relocate reptiles.)
 - Unless the licence holder is an 'approved' training provider, they must complete a 'refresher' venomous training course every 2 years, to ensure skills and knowledge are current and kept up to date to safely catch and relocate reptiles, (as per OEH policy with Wildlife Rehabilitation Groups).

I suggest new licence requirements should include:

Licence requirements

Applicants for a catch and release reptile licence need to apply to OEH and demonstrate and/or provide:

- they are 18 years or over in age
- why a licence should be granted and describe the location/area where they will operate
- 2 written references from people who can validate their ability and experience
- they hold a current first aid certificate, public liability insurance
- evidence that you have completed a recognised reptile handling course or have at least 2 years proven experience in handling venomous snakes
- They must hold a minimum R4 or (Class 2 Category 2) Reptile Keepers Licence
- Have secure facilities for housing any captured venomous snakes.
- Have security arrangements in place for the housing and transportation of venomous snakes
- After completing an 'approved' training course, must have actively assisted and can provide evidence in at least 10 snake catching callouts over a period of not more than 12 months, under the supervision with a licensed Catch & Release holder
- Unless the licence holder is an 'approved' training provider, they must complete a 'refresher' venomous training course every 2 years.

5. Keeping and dealing licences

5.1 Animal keeper licences

Consultation questions

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

I support the proposed staged approach to implementing a risk-based approach to regulating native animal keeping. This includes low risk species held on Class 1 to be removed from licensing and replaced with a Code of practice under the BC Act, to streamline the licensing system. I feel this would enable OEH resources be focused towards areas of greater needs, such as compliance, particularly with unlicensed animal keepers.

I agree with the current criteria for R3 – R5 advanced reptile keeper licensing and wish for it to be retained.

I also suggest the return of a five year licensing period for all Classes instead of the proposed two year return, to also reduce OEH resources.

As well as this, I would like to suggest the return of the minimum age of a licenced animal keeper to be from twelve years of age, with parental/guardian consent for Class 1 licences. This would allow those from 12 years to hold a licence in their own names instead of their parent or guardian's name, which I believe would provide a sense of ownership of the animal/s held under the licence and would encourage a minor to take responsibility in the care and interest of native animals. This care and interest would not only lead to a greater knowledge of the species held but also improved welfare standards.

I suggest the reintroduction of the Native Animal Keepers Consultative Committee (NAKCC Committee) to include all representatives from all native animal keeper society's.

- 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 would like to see all species held in other states, including all mammals, Emerald Tree Monitors (*Varanus prasinus*) Oenpelli Pythons (*Morelia oenpelliensis*), Strap-snouted brown snake (*Pseudonaja aspidorhyncha*) and Western Desert Taipan (*Oxyuranus temporalis*) to be included to the NSW Animal Keepers' Species List. This would ensure a smooth transition and also reduce OEH resources when licence holders move interstate within Australia. Also, currently there are species already being held in NSW, legally obtained through import permits, however do not have a species code listed on the NSW Animal Keepers' Species List. All venomous and dangerous species currently listed on Class 1 and Class 2 be moved to Class 3 Licensing.

I would like the Prohibited Species List of Amphibians be removed, as prohibition removes the opportunity for licenced keepers to learn about these species and contribute to the knowledge of their biology and captive management. Herp Societies, such as the Central Coast Herpetological Society who manage a Wish List to rehome reptiles should also be permitted to rehome amphibians.

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

I believe standards in the draft codes of practice, should be changed to guidelines, particularly referring to cage sizing and dimensions. The standard cage sizes and dimensions in the code of practice are too large for reptiles and ultimately will affect the welfare of the animal if these cage sizes are standards. If cage sizing for reptiles is too large, the animal will feel overwhelmed in a large space, which can quickly deteriorate their health, as they will tend to stop eating and retreat to the coldest end of the enclosure.

- 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 support a risk-based approach to annual records for licensed keepers, including simplified returns for Class 1 and advanced keepers.

5.1.2 Mammals

I support the inclusion of mammals to be added in the NSW Animal Keepers Species List. Currently mammals are on license in other States and Territories without any major detrimental impact on the wild populations, or welfare of the animals. Allowing

mammals to be held in NSW on Animal Keepers Licences would align us with other states and would ensure a smooth transition if a Keeper moves from interstate into NSW.

5.2 Dealer licences

Consultation questions

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

I believe a Reptile Expo managed by a Herpetological Society should not incur a licence or licence fee, as it is a meeting sanctioned by a Herpetological Society and therefore is like any other Herpetological Society meeting. Herpetological Society's were created for the sole purpose of dissemination of information and for members to sell or swap progeny that is bred.

However, I believe Reptile Expo's put on by individuals, with no Herp Society backing or have alignment with a Herp Society should incur a licence and a substantial licence fee, as well as the organisers donating at least one quarter of profits to a reptile conservation group.

I also believe elapids should be able to be sold at Reptile Expo's (Herp Society only), with the inclusion of the following protocols.

Protocols for the sale of venomous are as follows:

Have a separate room from the general public which would be for the use of venomous snake sales. All venomous snakes coming into and out of the room would be before and after the start and finish hours of the expo. All animals will be housed in ventilated clic clack containers, which would be cable tied on four points, to prevent the escape of any venomous snake. No venomous snakes will be permitted to be removed from the locked container at any time. All persons entering the room, would be subject to providing a copy of their R3 - R5 AKL as well as photo identification, to ensure only advanced reptile licence holders enter the room and to prevent the swapping of copies of AKLs. The general public would not be permitted to enter the room, without these documents. Persons purchasing any venomous snakes must pick up all venomous animals purchased after the close of the expo or must leave the expo immediately after purchase, to ensure no person is walking through the general public area of the expo with venomous snakes. Have St Johns Ambulance in attendance whilst the venomous room is operational. Have in attendance at least one R5 AKL holder on the door of the venomous room, checking all persons entering and exiting the room, plus one R5 AKL holder present inside the room to ensure no reptiles were removed from their display containers. Have a minimum of 6 x elasticised compression bandages in the separate room, in the event of a snake bite emergency.

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

I believe that there should be a class of licence (Specialist Licence) for those animal keepers who wish to sell commercial quantities of reptiles.

- 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?

The following criteria should be applied to a specialist licence:

ABN used to see animals, active website with sales of reptiles, selling animal products with the sale of animals, employs staff/volunteers.

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 not support the retention of Import and Export Licenses to monitor the interstate movements of native animals. Other states provide movement advices for free and I believe NSW should also be aligned with other states within Australia. If Import & Export Licenses will still be required for all species, I suggest a license activity period of 60 days from the approval date and not the date of application.

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

I support lower risk species be exempt from licensing, including those regulated by a code of practice.

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

I support the discontinuation of Import & Export permits for interstate movements of animals kept by mobile wildlife exhibitors, zoos, wildlife parks and tourist attractions.

7. Licence fees

Consultation questions

- Do you have any comments on the proposed principles for determining licence fees?
- Do you have any suggestions to improve fairness and equity in setting licence fees?

I strongly encourage the continuation of pensioner discounts of 20% and the 10% for applications processed online.

Reptile license fees are higher than those of other native animals and should be in line with other animal keeper's licence.

I would like to see the return of 5 year license periods and would encourage a considerable discounted value in comparison to the two year value, to encourage more license keepers onto five year terms, effectively reducing OEH's administrative costs.

Catch & Release operators are required by OEH/NPWS to have their own Public Liability Insurance. Considering this, perhaps they should be exempt from a licence fee, or if they are required to pay a licence fee then is it possible they be covered under the Government Insurance like other wildlife rescue operators.

I recommend with the introduction of a new 'online breeders license' ("Specialist License') that a licensing fee that is reasonable and justified would encourage more keepers to comply.

As mentioned above, I would like to see no license fees for Reptile Expos (organised by not-for-profit Herp Societies) and a substantial license fee be applied to all Reptile Expos (those organised by individuals and commercial entities).

I believe that instead of holding separate licences (e.g. Reptile, Bird, Amphibian, Mammal), it should be one licence which allows the licence holder to keeper any or all of those classes of animals.