

S00183 – Julia McConnell

I am an individual and not an academic so this response is subjectively drawn from my personal experiences in the field.

Note that I do not intend to comment on all specific questions but may include comments on matters not asked about but still relevant.

Consultation Q 4.2

Damage Mitigation Licences -

I don't understand the issue sufficiently to provide meaningful comment because I don't fully understand the full implication for the individuals who currently hold a licence to harm in relation to culling. Nevertheless I do recall an instance of a licence being issued adjacent to a wildlife rehabilitator who was soft releasing macropods that were then being 'culled'.

I don't see why a person who has been issued with a licence couldn't shoot many more animals than the number of tags provided? I'm not sure how this could be monitored.

Consultation Q 4.2.2

Damage Mitigation Licences – Protected Birds

It's not clear to me if the question only relates to birds at airports and grain storage facilities and the removal of white ibis eggs from public parks by councils?

If it does relate only to these circumstances I would support Codes of Practice.

I would not necessarily support Codes of Practice ad hoc for other birds and circumstances.

Consultation Q 4.2.3

Damage Mitigation Licences – Other Native Animals

Licensing to harm wombats and other protected animals should be retained.

Consultation Q 4.3.2

I agree with a Code of Practice for possum removal.

It should be sufficient for the licensee to obtain landholder consent rather than requiring the landholder to obtain a licence to harm.

Does this apply when a wildlife group removes a possum or does it only apply when a landholder employs a professional licensed possum remover?

Regulation should be consistent. Conditions should be identical for both wildlife groups and licenced possum removers. Discriminating against one licenced person as opposed to another achieves division. Working together cooperatively should be encouraged in all circumstances.

The activity should be based around the wellbeing of the animal in question not the motivation of the rescuer. The focus should always be on the welfare and best outcome for the animal.

Consultaton Q 4.4.2

Catch and Release Reptiles

The 20 kilometre release site limit needs to be changed. Research has shown that snakes do everything possible to return and inevitably don't survive if removed across barriers and/or taken too far. I usually remove the animal to across the road or to the nearest vacant allotment etc however I do realise that I probably have the luxury of doing that in the Blue Mountains where habitat is generally everywhere. It would be more difficult in a built up area but nevertheless the snake is there, and up until you were called it hadn't been noticed, so good chance it won't be noticed again if not moved from the area.

Licensing should definitely be retained for catch and release and the criteria could be greatly improved in the areas of education, referees and motivation.

When a person is licenced to catch and release reptiles it is certain that they are going to be confronted sooner rather than later with an R5 venomous species. Because of this the licence should be more highly valued by OEH rather than handed out to just anyone.

Education: Reptiles are not pests and are not widely understood as a species which is why only very experienced handlers should be carrying out catch and release activities. This means experienced herpetologists, not pest controllers, police and others currently being used in the course of their work.

There is a great need for catch and release activities to include education of the public. Individuals who do not have the ability to identify various species or know their habits and needs are simply unable to provide this service.

Most of my catch and release calls are resolved by speaking with the caller on the phone and advising them of what the snake is, why it is there and how they can safely live with it. The public are generally very receptive to this approach and most often quite grateful. In many cases they don't actually want the animal removed and are very pleased with their new found understanding and tell me this. It allays their fears and makes them feel more comfortable living with their local wildlife. They thank me and are happy for the snake to remain.

Referees: Surely a reference should have some value? Issuing catch and release licences to people who have done a venomous handling course and provide 2 references is unspeakably inadequate particularly when references that are meaningless are deemed acceptable. I am aware that references are accepted by the regulator from referees who have little or no experience or understanding of reptiles themselves such as police officers or members of the fire brigade. Also references are accepted from people who barely know the applicant.

Currently people pay a lot of money to undertake a venomous handling course which also includes a reference from the trainer of the day which is then used to gain a licence. There is something horribly wrong with this. They do the course and are provided with a certificate which is used to assist with gaining the licence. The trainer should not also be able to provide a reference that is used to gain the licence. You should not be able to buy a reference! An acceptable reference in this instance should be earned due to your experience and knowledge. A 2 day course is not enough to enable you to identify species adequately, nor to read what a snake is going to do, nor to understand why the snake is doing that. Many people who do these courses have little or no prior experience in snake handling and the attraction can often be ego driven. Most often the trainer has never met the person until the day of the training course so how can a reference from the trainer have any real meaning? It can only comment on what the trainer has seen of the person during the training.

I have had a reptile trained police rescue person on the phone with a red belly in a house. He told me he could remove it safely himself but isn't allowed because they had previously had an 'incident'. How many 'incidents' are actually occurring out there? We don't know this.

Another matter that I disagree with is the issuing of a licence to an entity that is not a human being, such as a company. The motivation is to make money. There is no best practice for animal welfare, public safety or education. These animals are our protected wildlife. It may be very convenient for some to be able to call in the pest controllers but there are no controls here and I have heard from members of the public of kick-backs.

I firmly believe that before a licence is issued the applicant should have a minimum 2 years experience keeping level AKL R5 venomous snakes, be able to provide 2 references from people who know them for their keeping and handling skills over a set period of time (say 2 years) and who know them to be motivated to do this work for the best of reasons. Most importantly the applicant should be asked the reasons why they want the licence.

People who have acquired level AKL R5 licences are generally passionate about the hobby, having spent years working with reptiles and therefore are the most qualified to carry out the work and be able to provide the appropriate motivation.

Motivation: If a person is only required to tick boxes and the regulator is unable to discriminate if all boxes are ticked then I think discrimination could be applied around the applicant's motivation. If the motivation includes earning an income and/or being ego driven then the regulator should be able to decline the application. Best practice for animal welfare could be used to apply this criteria as well as the safety of and education of the general public. The criteria used need not be set out so that applicants can work out what they need to say to comply. The question can simply be asked and the defined criteria applied.

I do think a person should be able to charge a fee for service because the catcher has costs, not to mention the time taken to do this work most of which will never be recouped. If a person calls a plumber or electrician they expect to pay. A person who has the experience and knowledge to effectively and safely remove a venomous snake and provide educational information should be paid. That experience and knowledge took years to learn and is another reason why the standards used to issue the licence need to be lifted. A meaningless reference from anyone is not good enough. Lack of years of experience is not good enough. Inability to educate due to little or no understanding of reptile habits, behaviour and needs is not good enough. The licence should not be given out so lightly to people who simply want to promote themselves and/or earn some money on the side or run a business. The licence should be considered to be something of value but it is given out too freely and lightly to people who shouldn't have it.

When I applied for a catch and release it was made very plain to me that the regulator did not want me to have it, and this after more than 30 years' experience of handling venomous snakes and having very good knowledge and a perfect track record - I was upset by this. Particularly having met some of the people who have been granted the same licence with virtually no experience or knowledge, such as a particular pest controller who couldn't identify a species of python! My 30+ years of service in the field meant nothing to the regulator! I was reluctantly forced - knowing I had ticked all the boxes and could not be discriminated against - to ring up regularly and be upset. Not my normal modus operandi and quite demeaning but I realised I needed to make a nuisance of myself.

I used to have a good relationship with staff at EOH but sadly that has been eroded by staff turnover.

Consultation 5

Animal Keeper Licences.

I recently heard that the NAKCC has been dispensed with. This is of considerable concern, rather than shutting it down it should be expanded and perhaps be more targeted at animal keepers rather than those who would like to control and/or shut down animal keepers. Over the years I tried to have a seat on this committee. Initially, whilst I was a member of the NSW Wildlife Council I was refused and told it was not necessary for me to attend as Stan Wood (WIRES CEO) was on the NAKCC and he could inform the Council as to the outcomes. After WIRES left the Council I was still denied a place. I did eventually obtain a position via Hawkesbury Herpetological Society however there were no meetings convened for a very long period of time and when in fact a meeting was held I was unable to attend because my husband was dying and as his carer I was unable leave him. I therefore could not contribute to this forum which I recognised as an important avenue to input ideas and issues that I felt were not being addressed by others who may have been present. I found this whole saga very frustrating. Generally OEH needs to be a lot more inclusive of the entire sector, not just favoured components of it.

Consultation 5.1.1

Licence Conditions

I do note this elsewhere however keepers will not provide their licence number on line as it can too easily be used illegally. Keepers discuss these matters and exchange personal and private information in the 'private messaging' areas. It should be enough to simply say, 'licence required'. I don't think anyone will provide very private and personal information on any public forum and should not be expected to do so.

Consultation Q 5.1.3

Keeping and Dealing licences

Yes, I support the risk based approach to regulating native animal keeping however I found a few anomalies in the Revised Animal Keepers Species List.

Due to time constraints I don't feel able to address this properly however there are a number of genus where the various species have been split between code and on licence. I don't see how this can work. Morelia, Pogona, Antaresia etc surely must each be either under the code or requiring a licence - particularly due to cross breeding. Where would a cross breed fall? I think this needs some tidying up.

Animal Welfare in Draft Code of Practice

As a venomous keeper I would like consideration be given to changes around the keeping requirements to enable improvements to the welfare of these animals.

It is my experience that people who hold R4 and R5 level licenses are responsible and genuine individuals with a passion for their hobby. I think there should be the ability to allow these animals to spend some time in a natural environment rather than permanently locked in glass/timber enclosures where there is no ability to experience natural enrichment such as wind, rain, sun and natural odours etc. I understand that in other states such as Tasmania and Victoria keepers can keep venomous species in locked, secure outside enclosures. In NSW this is safely done in zoos and animal parks and to my knowledge there has never been a problem with it. I ask that serious consideration be given to this request in the best interests of the animals.

Support for Risk Based Approach to Annual Records

I disagree with the concerns of wildlife rehabilitation and animal welfare groups and support the proposed risk based approach.

Management of Abandoned, Escaped and Seized Native Animal Pets

Note that not all seized native animals are escaped pets. Some are wild animals that are inadvertently brought back by members of the travelling public or from camping trips. This was something I found to be not uncommon. Only an experienced herpetologist would be able to recognise the difference.

This is a very serious issue. The current situation is quite dire and has been allowed to manifest into an unmanageable situation over a period of years. At the moment animals are very often passed into wildlife groups who hold these animals sometimes for protracted periods of time. The animals are held by volunteers who joined the group to rescue injured animals. They do not have adequate or often appropriate facilities to hold surplus reptiles.

I have had members of groups who have told me they don't respond to calls anymore because they have no facilities in which to hold an injured animal as their facilities are full of escapees of some sort.

In the last couple of weeks I am aware of one such animal being passed off licence to a permanent home. I don't blame these people for doing this because they do not have adequate facilities to keep the animal long term and requests to have it legitimately put on licence and moved to a permanent home have been ignored. They have done the right thing with regard to the welfare of the animal which is their prime motivation.

I have had numerous people from groups in different areas approach me about the problem of them being required to hold multiple animals. I have not been able to assist although I usually make suggestions. In one instance I suggested they contact their group and follow the group's procedure for dealing with this only to be told there is no procedure. I know that John Mostyn was doing this for a while but numerous people have told me that he's told them he is full. I have suggested that the group contact National Parks and request an urgent ballot. I have also suggested the animals could perhaps be taken to the John Moroney Centre and also that people could drop the animals off at their nearest Area Office. Due to the number of calls to assist I have received from all over the Sydney region I have become very aware that there is a problem and as such have had cause to give the matter some thought.

I noticed recently that Kellyville Pets had an 'open day' to rehome ballot animals and wondered where and how quarantine was managed and/or implemented on the day considering that they would have many other animals in their facility?

Whilst I do have some suggestions I believe emphatically that wildlife groups should not be used to hold these animals. It is not part of their licence obligations, is detrimental to their core business and should not have been allowed to escalate to the level of current involvement. Their volunteers are not herpetologists and I have had complaints from them having to hold animals for long periods of time, such as 6 months and more. I do not understand why the groups have not complained about this – perhaps they have? If so, it has not been addressed. Even running more frequent ballots should surely have been effected?

As with surplus dogs and cats, many of these animals need to be euthanased. As I ran the 'wishlist' for Hawkesbury Herpetological Society for some 8 years I am very much across the problem. There are many species which are very difficult to find homes for. This is because the market is flooded. It is an identical situation as with dogs and cats, people breed them, pet shops sell cute babies and then grown animals become less attractive to their owners. I can only see this getting worse because the most common of species that are already difficult to home will now be sold under the code in pet shops as cute babies and won't be cute when they are fully grown.

There needs to be facilities set up to deal with this problem which includes euthanasia in a timely manner rather than having animals being held all over the place by people who aren't equipped and often do not want to be placed in this position. There also needs to be a collation of information as to where all these animals are. At the moment there is no system whatsoever. There should be a requirement that animals coming into care be reported to a single point of contact within a prescribed timeframe – say 1 week. After this the animal should be moved to a facility where there is the capacity to assess them. From my past experience, some are unwell or infested. Some are wild animals and this is not uncommon as people commonly bring them home in their camping gear unknowingly. A ballot or some other form of attempting to find homes can then be implemented and if no home found within a short period of time they can be euthanased.

If the facility was say John Moroney Centre (just an example) people could go there with a view to buying an animal. Staff at the facility would need to be experienced enough to assess the animal.

Another problem with this system not being in place is that people are tempted to simply release animals into the wild. I know this because I receive calls from the public, usually saying they have a friend and they're moving or going overseas and don't want the animal and they're going to release it to the wild. The caller will tell me they don't want this to happen and they're seeking an alternative. People want to do the right thing but there is no known system in place.

I recently received a similar call from a person who sent me a picture and the animal was a boa! I did my best to have the animal passed in but was unsuccessful. The person who had it didn't know what it was and I assume the person it eventually went to didn't know either!

There is definitely a need to put a system in place where animal movements can be more easily and adequately managed and accessed by the public. I see this as a big problem that just isn't being addressed.

So, my suggestion would be create a central point where animals must be reported to and passed into, in a very short timeframe, say 1 week and quarantined during assessment. The holding centre needs to have a very experienced staff member able to identify species, assess an animal for sickness, disease and wildness. A wild animal is generally not suitable for rehoming and there could be some attempt to return them to where they came from if possible. The public could access the holding centre with a view to buying these animals once they are assessed as suitable to be re-homed. A reptile vet should attend on a regular basis, say monthly to carry out vet checks and euthanasia. I realise this means financial costs however it is necessary. Perhaps costs could be off-set by sales.

Your paper suggests that this situation has become a problem for rehabilitation and welfare groups and meetings have been held about it. Again I believe these consultations have been exclusive. This problem has been festering for years and no-one has been talking to keepers about it - it's just been permitted to roll on. This is not a problem for rehabilitation and welfare groups. Where did it ever say this was their responsibility? Why have they been inappropriately used in this way? OEH needs to consult with those who are more knowledgeable about the problem – keepers and herpetologists.

Keeping Native Mammals as Pets

I disagree that native mammals are unsuitable to be kept as pets. One of the reasons given is the differing State legislation. This could be negated if there were National regulation and I don't believe this should be sited as a reason as it doesn't stop other animal keeping exchanges. Other states and territories allow it in addition to some of these animals being kept in other countries. I'm sure that keeping native animals would assist with conservation especially considering that Governments are not protecting habitat and allow cats to roam free and cane toads to breed and spread without restriction.

5. Dealer Licences

Consultation Q 5.2.1

Dealers must accept returns of unwanted or unhealthy animals no longer wanted by a customer.

Is there a time limit on this return? Could a customer purchase an animal, neglect it for some years then return it when it is sick and needing veterinary treatment?

I don't believe this should be open ended. If an animal becomes sick due to neglect or mistreatment the owner should be responsible for veterinary treatment as they would with a dog or cat. If the animal is simply unwanted because the purchaser changes their mind then the seller could be required to take it back but should not be obliged to return funds for an unwanted purchase after a set period of time.

Licences for Animal Expos:

I don't agree with this. The organisers are providing a venue for breeders and buyers to exchange, they are not 'dealers' themselves and the venue operators are strict with Insurance requirements and the layout of the venue. The Reptile Expos are very much focussed on education and family entertainment so I don't think the not for profit organisers should be seen as 'dealers'. They are not dealing themselves and make no direct money from any financial transactions via the sale of reptiles.

All transactions are conducted in a normal way with the exchange of licence details.

Why would OEH be involved in monitoring the various educational talks, demonstrations and competitive events? Any person providing demonstrations or giving educational talks are licensed to do so.

Breeders and keepers are aware of hygiene issues and do not want to expose their animals to any pathogens etc. I don't see why they can't be seen as responsible enough to abide by their normal hygiene procedures.

As I have previously organised a reptile expo and been involved in the financial outcome of several expos I personally know that any profit made by the organiser is from door entry only.

Consultation Q 5.2.2

During targeted consultations, licensed dealers and welfare groups expressed concerns about online dealing by licensed animal keepers:

Licensed dealers have a clear conflict of interest in this matter and welfare groups have no evidence to support these claims.

I personally have never used and do not visit sites such as Petlink and Pet Pages but I have just checked on line and it appears that Petlink is not now operational however I have just looked at Pet Pages and see that there are 23 ads for various reptiles. They all seem to be in the Sydney area. I disagree that people trading online are not subject to the same animal welfare, customer service and record keeping standards. Unless these comments are insinuating that people who use this site are dealing illegally by selling 'off licence' these statements are simply incorrect. The animals being sold there are subject to the same licence requirements as everyone else and I note that on the ad I checked it stated exactly that.

Poor welfare outcomes for animals bred for the purpose of sale, similar to welfare concerns about 'puppy farms':

I disagree with this view. If reptiles are poorly kept they do not breed readily, unlike dogs and cats. If welfare groups were so concerned about 'puppy farms' they would do something about them. Puppy farms contribute to the overall pet industry and will never be dispensed with.

Purchasers receiving little or no information about their legal obligations for keeping native animals, including housing and dietary requirements:

I disagree with this comment that purchasers receive little or no information about the legal obligations and keeping requirements. Where is the evidence of this? Or is it just an inaccurate and convenient statement? Staff in pet shops are not necessarily keepers themselves but employees and may not have a passion for the hobby. Whereas private breeders are keen to produce a top quality animal and are very aware of licensing and regulatory requirements.

I have personally seen a damaged baby reptile which was sold for a very exorbitant price by a pet shop, so I may not have the same faith that others may have that only pet shops will produce and sell top quality animals. I also know of people who breed and sell reptiles who are fastidious in their keeping and would never think of selling any animal that may be substandard. It's too easy to cast aspersions so easily and put everyone into little boxes that may suit the argument of the day.

There are cowboys in every industry and hopefully if appropriate criteria can be formulated it will help to rectify these problems if and when they are found to exist. I know of people who keep, breed and sell animals who would provide far superior information on the keeping of their animal than would be obtained from a pet shop handing out a leaflet or providing a short course by a person without the experience of the breeder. I don't think these blanket statements can be validated. This discussion needs to include the people who are affected the most, many of whom have been excluded and therefore not heard. So I think these views may be quite skewed. In addition, this Discussion Paper was not widely distributed and those who will be affected did not receive it in time to comment. People are generally sceptical of the regulator and the process and I understand why.

Increased risk of unwanted pets being abandoned or released into the wild since the seller is not required to accept returns of unwanted or diseased animals:

If there is an increased risk of unwanted pets being abandoned or released into the wild then require the seller to be responsible and accept returns. There should also be an easy and widely known system for people to hand an animal in for assessment and rehoming. At the moment there is no known avenue for people to do this which is why people like me are called regularly by people needing to do this. People who are moving and can't take their animal need this outlet such as the RSPCA provides for dogs and cats, in saying that I am not suggesting that the RSPCA get involved in such a system. They already have a core business.

As I said previously I think there should be a time limit on the ability of the purchaser to return. (see 5.2.1)

Limited ability for OEH to monitor animal transactions and identify animals illegally taken from the wild for the purposes of sale:

What does this mean? Does it mean that an animal cannot be taken from the wild and sold in a pet shop? Does it mean that a member of a welfare group couldn't take an animal from the wild for illegal keeping or sale? How would OEH monitor this if it happened? This statement is pretty fair fetched and looks quite desperate.

Those driving cars are required to hold a current drivers licence. Some people drive without a licence however most people comply. An unlicensed driver can still drive a vehicle. All drivers should not be assumed to be unlicensed.

On line dealing doesn't inhibit OEH's ability to monitor animal transactions nor identify animals taken from the wild.

OEH has no ability to monitor animals taken from the wild and it does happen and will continue to happen regardless of regulation and probably perpetrated by those least expected. Some people are shoplifters but this doesn't mean that most shoppers are shoplifters. Most people who keep reptiles are not criminals and do not carry out this criminal activity. Most reptile keepers want to do the right thing and are responsible in their dealing and want to comply with regulation. In saying that, it isn't always easy. OEH don't always respond and some people are still unable to set up their electronic record and have no way of doing so because their messages and attempts to contact OEH are not successful. I must say I have not had this problem myself but know of some who have.

An 'uneven playing field' for licensed dealers who must comply with licence conditions that seek to prevent and manage these concerns:

We all have to comply with licence conditions that seek to prevent and manage these concerns. It would be very easy for licensed dealers to be trading in animals illegally taken from the wild. With so many animals coming and going and being bred by them, anything is possible. This needs to be kept in perspective. The inference that pet shop owners and operators are pure and above suspicion but reptile keepers are intent on criminality is offensive.

I don't blame the pet industry for saying things like this. It simply confirms what I said before that these comments reflect the pet industry's conflict of interest in this discussion. We all have to comply with licence conditions no matter who is selling a reptile. I think these sorts of statements are desperate attempts to gain more control and have more power in order to make more and ever more money.

With regard to the statement that online sellers do not display their licence, this is because if they did it could be stolen by anybody and used illegally. No-one wants to expose their personal information. Licence details are disclosed in 'private messaging'. It should be enough to simply say 'licence is required' or something similar and perhaps the regulator could/should intervene if this is not stated. Most people selling on line are only too aware of the licence requirement and are compliant.

Consultation Q 5.2.3

Regulation of online dealing

I support retention of licensing for pet shops.

I am not familiar enough with licence conditions for pet shops but would like to see more education being provided to the public buying reptiles at pet shops and expos. A care sheet is barely adequate because people often don't understand what they're reading? Nevertheless I think it needs to be a basic requirement eg: a person selling baby turtles at an expo should be required to provide a detailed care sheet for that animal. Very basic information such as the inability of UV light to pass through glass needs to be thoroughly understood. I have had to tell people at expos to keep their new purchases out of the sun. Unless people are verbally informed what may seem obvious may not be understood at all.

I support licensing for persons selling from over the internet but only if it is a 'business'. A hobbyist should not fall into this category. There needs to be a clear distinction here and not based entirely on ATO criteria. I suspect the number of individuals actually running a 'business' would not be that great. Most online sellers would be hobbyists.

I agree that the criteria needs to be spelled out. With regard to ATO criteria – this is a difficult one for hobbyists. I believe that hobbyist has no chance to make a profit and don't expect to because they don't keep their reptiles in such a way as to be cost effective. So I don't think the first dot point ('intention to make a profit') is a problem, nor even the 3rd ('activity carried out like a business') however the 2nd criteria could, because animals breed and so need to be moved on from time to time. This could be classed as a repeated activity over time. I don't think this is fair and to implement this would simply be to support the pet industry.

I know people who breed reptiles, some for money and others simply to indulge their passion. The differences are immense. To prevent hobbyists from continuing their passion is an abhorrent concept and it appears that this could be where this is intending to go? How are current distinctions made between commercial and hobbyist bird keepers? I'm sure there's plenty of people breeding and selling canaries and budgerigars.

The hobbyists I know couldn't possibly make money. They would pour any money made back into the hobby which is a constant financial drain. Ever expanding, changing, and providing more enrichment for their animals. I have also noted these people inevitably have long term permanent employment which they would need to prop up their hobby.

People known to me who breed reptiles for money do not have other employment and keep their animals in minimal enclosures such as banks of plastic drawers – a one off cost. They may also provide other reptile related services such as selling reptile related paraphernalia or providing training etc

I think the differences are stark and if OEH can't recognise them without resorting to inappropriate ATO rulings then there really is a problem.

OEH staff used to have valuable knowledge of the industry and what goes on in it, however this knowledge was lost when those staff were 'let go'. Now OEH runs blind and only seems to have ears for certain industries which are really unrelated and at arms' length. That knowledge needs to be regained somehow so the sector can feel secure again. I'm not sure how this can be achieved, perhaps a forum like the NAKCC but with participants being relevant to the industry and also more numerous rather than a selected few. At the moment reptile keepers feel they are viewed (unfairly) with suspicion for no reason whatsoever. People are cynical, feel vulnerable and don't have confidence in OEH because they aren't heard anymore. In addition, most reptile keepers are not members of Herpetological Societies, so only having representation from societies excludes the majority of keepers.

Consultation Q 5.3

Interstate Import Export Licences

I don't support import/export licences. However I do think that all regulation should be National. This would negate the issue.

I approve of exemption of lower risk species from licensing

I support discontinuation of import export licences for interstate movements by zoos etc.

Consultation Q 5.4

Taxidermy and Preserved Specimens

I support retention of licensing for taxidermists.

Preserved specimens should be exempt from licensing.

Consultation Q 7.3

Licence Fees

I'm not sure the amounts to be charged are clear? On the one hand for Reptile Keepers the charge is to be \$30 but then additional fees are not spelt out and could be anything? This implies an unknown cost although the intention may be to publish the methodology for calculation it isn't possible to agree with an unknown, so whilst I

agree with a one off cost of \$30 I don't agree with an undisclosed amount to be determined sometime in the future after this proposal has been adopted.

I do agree with the continuation of fee waivers via discounts for pensioners and online applications.