

S00123 – Lorraine Vass

Thank you for the opportunity to comment on the discussion paper which has been developed in response to the risk-based approach recommended by the Independent Biodiversity Legislation Review Panel with, I understand, stakeholder representative input.

I am commenting on the following:

- Threatened species licences which I support retaining for all activities currently requiring a threatened species licence (2: pp.6-8)
- Protected birds and other native animals – I support the retention of licences to harm in both cases (4.2.2 and 4.2.3: pp. 18-20)
- Catch and release possums - I support the retention of catch and release licences with the holder being responsible for obtaining the landholder's consent (4.3: pp 20-21)
- Catch and release reptiles – I support the retention of licensing for reptile handlers (4.4: p.22)
- Animal keeper licences – while I understand the need to reduce the number of such licences, any fauna held in captivity deserves an optimum quality of life and keepers must be held accountable. On balance I support the proposed staged approach to implementing a risk-based approach to regulating native animal keeping. I'm assuming that the period of the initial stage will mirror the period proposed for introducing changes to the species list, i.e. a period of at least three years, after which the outcomes of the initial changes will be independently reviewed. I presume the efficacy of the new education programs for native animal keepers and the wider community and the proposal for risk-based annual records for licensed keepers outlined on p.31 will be part of the review. (5.1: pp.23-31)
- Dealer licences – I support the retention of licensing for pet shops that sell native fauna and I support licences for persons conducting commercial selling of native fauna online or from their homes. I also support expanding the list of species that may be sold subject to a review of outcomes similar to that for changes to the NSW Native animal Keepers' Species List. (5.2: pp.31-35)

- Interstate import and export licenses – I support retention of interstate import and export licences, however it seems reasonable to discontinue such licences under the Biodiversity Conservation Act 2016 if interstate movements of animals kept by institutions which are subject to licensing by DPI under a completely different Act. 5.3: pp.;35-36
- Taxidermy and preserved specimens – I support retention of licensing for taxidermists and persons and organisations holding preserved specimens. (5.4: pp.36-38)
- Scientific Licences – I support the proposed changes to scientific classes (6: pp.39-41)

In conclusion then, I accept the criticisms levelled at the existing wildlife licensing system by the Independent Biodiversity Legislation Review Panel and the expected benefits of adopting the risk-based approach, particularly concentration of enforcement efforts and more effective regulation of higher risk activities and delivery of new community education programs.

I appreciated the discussion paper's solid overview of current practices and explanation of proposed changes. I also agree with the staged approach to their implementation in regulating native animal keeping.

While I do not have personal experience of the concerns expressed by the wildlife rehabilitation and animal welfare communities, I have little doubt that the new system will continue to be open to the abuses that presently exist and that unintentional harm to native wildlife will continue to be perpetrated by well-meaning but ignorant members of the public.