

S00136 – Mark Hawker

I have decided to express my thoughts with elements of the review taking place currently into wildlife licensing in NSW. These thoughts are expressed here independently of my role as a founding member of the Herpetological Cooperative of NSW and do not represent the views of that body.

My decision to do this is based on the realisation that the submission from HCN of which I am a contributor does not adequately address the issues that are a concern for me in the manner that I would like to respond to them, hence the reason for this separate submission.

As a private keeper of dragon lizards the only areas in the review where I have a particular interest are the import/export permits, licensing to keep and record keeping.

It is not my intention to address the individual elements of the review in my comments here but rather make some broad based philosophical statements that reflect my view that licensing for reptiles held in captivity and the associated record keeping etc is in many cases inappropriate and a waste of resources. In spite of statements from OEH saying the review seeks to deregulate aspects of reptile keeping and licensing etc, it in fact missed that opportunity badly because it failed to make the connection that captive individuals of any animal group are in effect no longer wildlife.

For me a reptile held in captivity is not wildlife. By definition it is no longer living in the wild and therefore is not wildlife. This is especially true for a native animal that has been held and bred through several generations in a keeper's collection. In my case I have several species that I have held for 10 years, 15 years and more and bred many times so that the current animals are seventh and eighth generation individuals. Why are these animals still regarded as wildlife. They are not. Yet under the existing regulations and the current proposals I am still required to provide records and keep data on these animals and cannot move them freely without keeping track of where they are going and if moving them interstate I need an export permit.

I have no issue with having to be licensed to keep native animals in captivity. This is indeed no different to the requirement for any other pet owner to have a license to keep a dog, cat or bird etc. But that is it, there should be no additional requirement to do anything else, keeping records doing returns etc, is ridiculous.

Which brings me to my next big issue with the review process. In several places in the discussion the stated aim of regulating wildlife management is to mitigate risk associated with illegal take of species from the wild. Further, that this activity puts at peril the very existence of said species in the wild. I take serious issue with this whole approach and regard the comments as nothing short of major distortions of the truth. As distasteful as the activity is it is not of itself even a minor factor in the existential problems facing reptile species in the wild in Australia today. For OEH to make such statements out of context with and in complete disregard of the more serious negative impacts such as predation by feral cats, dogs, foxes etc, land clearing, road kill, is nothing short of storytelling bias at best

Whether we like it or not every bird, dog, cat, reptile, etc in captivity had an origin point of a wild individual being bought into captivity at the starting point of the whole process.

Quite frankly OEH should consider working with experienced keepers to establish captive groups of at risk populations of native species instead of demonising keepers as ruthless pillager's taking wildlife from the wild for their own gain. Unfortunately the one or two instances where this activity does take place is usually always unfairly highlighted by wildlife authorities around the country generally as a major cause for concern when all the evidence tells us it is not. There are many species in the wild today that have very restricted ranges that could very easily be completely wiped out by a single fire event, or inadvertent land clearing, or more likely by being eaten into extinction by feral cats. Why is there not more emphasis from OEH on stamping out the number one environmental problem for wildlife in Australia, the eradication of feral cats. Is there a sniff of animal welfare lobby I can smell here? Sorry I don't mean to be cynical but it is well known that the AWL have too much influence in government at the present why should OEH be any different.

I have been a dragon keeper for the best part of the last 30 years. I have worked with more than half the known species during that time and currently house around 30 odd species in my private collection. I have over the years had many species come to me through collect from the wild permits in other states, particularly WA and NT. The reality is that the impact on wild populations of the collection of those individuals for my collection and further study is nil. No impact what so ever.

I have spoken to several people at OEH over the last few years on the issue of not allowing importation of certain species because they are not on the species list. This is another area of major concern for me. I totally reject the notion that if a species is not on the keepers list then it is not allowed. As far as I am concerned if a species is legally available in another state and it can be proven to be legally obtained then I

should be allowed to bring that species into NSW. The use of import permits and species lists etc, to block species entering the state is unfair and unreasonable.

The recent behaviour of OEH with regard to not allowing Oenpelli Pythons into the state is a classic example of this. The Oenpelli project is one of the most visible breeding projects in Australia, has the full support of every party involved in it, from NT government, through local aboriginal land owners, elders, etc, everybody that is except NSW OEH. This program is right in the middle of virtually guaranteeing the future existence of the Oenpelli python by making it commercially available to private keepers much the same as the Rough Scaled Python project did a few years ago, and yet OEH sit back and say no its not on the species list you can't have it. With great respect, I think we need to be working towards better outcomes than that.

I had the same thing happen to me only a couple of years ago, where I applied for an import permit to bring in a trio of young Ornate Dragons *Ctenophorus ornatus*. My application was rejected in spite of the fact that they had already given me a permit to bring in 5 of them 3 years earlier and had issued a permit to another dragon keeper for the same species only a few months before my application was rejected. Eventually after speaking to a senior staff member my application was approved but only after I jumped up and down and pointed out that what they were doing was very likely not defensible in court. I am sorry but that sort of uncoordinated nonsense has to stop.

About 12 months ago I imported a pair of Centralian Tree Dragons *Amphibolurus centralis*, the first time the species has been bought into NSW. The species has to my knowledge had little if any work done with it too determine optimum husbandry requirements, so you can imagine my surprise when it turned up on the revised species list to be added as a class 1 species.

I am not sure how OEH determined the category but given the rarity of the animals in captivity and the complexity I am discovering with its husbandry requirements I would have had this species as class 2. I am really surprised that no one from OEH contacted me for an appraisal or first hand commentary on difficulty or otherwise of maintenance of this species. As it turns out it has some peculiarities and vagaries that make it a little more difficult to work with than I first anticipated when I got the original pair. I was able to breed the pair, but had enormous difficulty getting the female to actually nest in spite of trying everything I could think of. In addition the incubation period was at least 30% longer than I expected as well. All of these factors were unknowns and contributed to a poor result with the first clutch of 8 eggs

out of the pair that yielded only 1 healthy juvenile. My point is that there is a learning curve with this species even now and yet it is proposed as a class 1 species, I don't think so.

Several years ago I was contacted by researchers at Melbourne University and offered access to a species not on the species list or even the proposed addendums. The species was Lake Eyre Dragons *Ctenophorus maculosus*. I was offered these animals because of my reputation as an expert dragon keeper in Australia. Unfortunately when we investigated the research permit we found that the animals could not be moved on to a private keeper and had to go to other institutions at the conclusion of the research project. Again the reason I make this point is that every now and then as happened with this species and *A.centralis* I get a call asking if I want to take on a new species. I have spoken about this with senior staff at OEH. I want to be able to access and bring these species into my collection to work with and get them established in captivity. I don't want to find that I am faced with artificial barriers created by a bureaucracy that dictates to me what I can and can't keep. As I have said earlier if it is legal then I should be allowed to bring it in.

I would rather work with OEH than butt heads with them, I have no issue with any other aspects of the changes proposed, personally however, I do see an enormous amount of effort going into a regulatory document to bring about little if any real and meaningful change. Particularly change that is supposed to benefit license holders and keepers generally. Quite honestly what I see is more of the same flawed process of trying to regulate "wildlife" ownership when as I have said earlier any animal held in a captive environment not subject to the vagaries of a wild existence is no longer wildlife. Trying to regulate for this is a flawed process at best. Instead of trying to manage this OEH should be putting its resources into environmental management programs that offer much greater returns for the money expended. Programs such as eradication of feral cats, dogs, foxes, etc. More emphasis on education to stop people needlessly running wildlife over on the roads, happens all the time. Millions of reptiles die every year on our roads because people think it is ok to run it over, when they can easily avoid it. These are the big picture issues that OEH and other wildlife and environmental management authorities should be concentrating on, not trying to overregulate a handful of individuals who happen to have a love of keeping reptiles. A group of individuals by the way that has done more for the study of reptiles, particularly captive biology, than all the research projects and government studies etc, combined.