

S00154 – Michael Donnelly

Risk-based Approach:

I agree with the objectives of the Risk-based Approach such as reducing red-tape, streamlining the licensing system, acknowledging the difference between low-risk activities and high-risk activities. I do however have concerns regarding the length of time between reviews – currently proposed to be every three (3) years. This appears like it is stating that the proposed changes will take three years to introduce, and any suggestions we make here would not be considered until that next 3 year review. Plus who will be performing that review? A new team? Will we need to go through all of this again, rather than having the same people involved who already have the history to support the process.

While I support the low-risk approach I question the validity of allowing reptiles even Blue-tongues to go un-checked and un-regulated. I strongly believe there should be a required 'Learners License' that all new owners must apply for a two year period. Within that time they must be able to then show they have expanded their skills before being able to go on to a Class 1 license. The animals a Learner' can keep are the coded species.

Risk Assessment Tool:

I would like to see how this Tool will be implemented and utilised for commenting further. I am interested in discovering:

- How quickly a RAT will be processed?
- Who will be involved in decision making?
- Will persons involved in decision making be suitably qualified?
- Will there be an appeals process?
- How often will these appeals be processed?

I also would like to see all of the Class Licenses combined. That is AKL Class 1 – keeps Class 1 birds, reptiles, frogs and mammals – all on one license. This makes much more sense.

Along with the return of a five (5) year licensing period with the exception of my proposed 'Learners' being for a two (2) year term.

Do you support a risk-based approach to annual records for licenced keepers including

simplified returns for Class 1 and advanced keepers, but retention of current animal record book requirements for keepers of venomous snakes?

I think this risk-based approach, is great and long overdue, and I support the continuation of record book keeping for keepers of venomous snakes.

Dealer Licences

Do you support the retention of licensing for pet shops that sell native animals and expanding the list of species they may sell?

I personally don't support pet shops being able to sell animals at all. Too many times I have entered a pet shop and seen animals in wrong sized enclosures, in dirty conditions, un-well looking animals, species in with species that should never be housed together.

I have had so many salespersons try to sell me equipment I don't need and often know what they are trying to sell me is incorrect for what they claim its use to be.

Pet shops should only be there to sell products and to provide contacts to recommended private registered breeders.

Can you suggest any changes or improvements to the licence conditions for expos?

Expos – if run by a Reptile Group – are a great idea and OEH should be doing more to support them – not restrict or place more regulations on them.

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

Simply – No.

Clause 9 of the 'General Conditions of a Native Animal Keepers Licence" clearly indicates 'an internet site related to the keeping of the animal' is permitted.

The internet is the way of the future and people shouldn't need to pay license fees to advertise their animals – this seems like a money-grab by OEH being nudged along by the pet industry.

Online resources are invaluable for specialist reptile keepers. It's within select groups and forums that keepers are able share knowledge, and find others who have the required level of skill and experience with whom to trade/exchange

Welfare concerns are mostly invalid and being fuelled by this new radical push for animal rights. I swear the 'nutters' are moving in and before we know it – you won't be able to own a pet without a Bachelor's Degree or worse. It's just ridiculous.

Enough laws exist to monitor the welfare & prosecute when cruelty does arise, if the authorities did more to check up on complaints and if the Courts actually bothered to hand down proper sentences.

Interstate Import & Export Licences

Import and Export Licences for Interstate movements are ridiculous. The recording of movements should be no different if an animal goes from Parramatta to Penrith or from Rooty Hill to Rockhampton. This again just looks like a money grab by the government.

If Import & Export Licences then give us longer periods of time to transfer the animals, as currently most of the application time is taken up waiting for OEH to approve the Class 2 and above permits. You can fix that by allowing all permits to be processed online.

Current Licence Fees

I totally want to see the continuation of pensioner discounts of 20% and the 10% for applications processed online.

I'd also like to a balanced licensing fee system, as at the moment it seem very expensive. As you rise in Class, you should not pay more – it should be less. We should be rewarded for our levels of experience.

Mammals

OEH acknowledges the keeping of mammals on licence has been permitted in other States and Territories, so why is NSW so far 'behind-the-times'?

Victoria and South Australia both have had native mammal keeping legal and active for 43 and 46 years respectively without major detrimental impact on the wild populations, or welfare of the animals, and are a statement of how inaccurate and blindsided NSW's stance actually is.

NSW has been subject to only one input from stakeholders and that is the welfare & rehabbing sector. This sector claim to be the only people who could 'possibly know how to care' for a native animal, when in reality that is just pure conjecture utilised to hide the fact they want to maintain their status quo of holding the monopoly on native animal keeping. There is a level of prestige attached to having a possum or gliders for their friends to come and see. Who would want to give that up?

Native pets hold an immense value as companion animals as they offer both the traditional positive influences on human wellbeing as well as creating an emotional connection between people and native animals.

As a member of the Native Mammal Keepers of NSW (NKMN) Working Group, I implore OEH to pull your heads out of the sand and help us to bring more mammals on to the species lists, if for no other reason than the massive conservational benefits, from educating the public to having species saving captive populations. The existence of captive populations in the bird community has proven to be the life-line to saving of several bird species in this State and Country. That simply can no longer be ignored.

Thank you for this opportunity to contribute