

s00028 – Richard Sharp

Thank you for the opportunity to comment on the proposed wildlife licensing changes.

I concur with most of the proposed changes and fully support the need to implement a risk-based approach to regulating human–wildlife interactions under the Biodiversity Conservation Act 2016.

The only aspect I do not support relates to the proposed changes to scientific licence classes. In particular, I disagree with the licensing arrangements for ecological surveys and consultancies.

Based on the evidence shown in the thousands of development applications and supporting documents submitted to relevant authorities such as Councils and DPE each year, a significant proportion of the ecological surveys are done by persons that do not have a scientific licence.

Furthermore, most relevant authorities don't check or require such ecological surveys be conducted by a person that does have a scientific licence.

I note that for many years, OEH has struggled to initiate any compliance audit of the scientific licensing arrangements.

I also note that if a strong compliance regime was to be enforced around the broadly undefinable activity of 'ecological surveys', then this would trigger a public debate about leisure activities such as bird watching, spot lighting for nocturnal animals, underwater diving, etc,

In my view, if it is proposed to retain licensing for ecological surveys, then this should only apply to ecological surveys which involve methods that may have or will have an impact on plants and animals in the wild.