



24/7/2018

I write this submission on behalf of The Aquarium Industry Association of Australia Inc (AIAA) in response to the current NSW Department of Environment of Heritage Draft Discussion Paper: Towards a risk-based approach to wildlife licenses. The AIAA is the peak industry body representing aquarium retailers, wholesalers, and importers. We currently have over 300 members Australia wide representing in excess of 140 individual businesses. Our members' primary interest would generally be focused on turtle species however some of our more specialised member businesses would also have interests in a more diverse variety of reptile and amphibian species.

Overall the AIAA is generally supportive of the proposed move to a risk-based approach to wildlife licensing in NSW and most of the recommendations that are included in the paper. In particular we strongly endorse the recommendations made in section 5.1 of the discussion paper.

We do however have strong alternative views on certain aspects. Specifically, our comments are in relation to the recommendations and consultation questions in sections 5.2 of the discussion paper relating to commercial licensing of pet shops and the proposed introduction of licensing for individuals selling animals in a commercial like manner.

- The AIAA only supports the retention of the current commercial licensing system for those pet shops / aquarium shops that wish to trade in class 1 species. The AIAA does not support the retention of the current commercial licensing system for species that are deemed to be code of practice only species. These species should be able to be traded without the burden and cost of a commercial license as long as strict adherence to relevant codes of practices and the standards they prescribe are maintained.

It makes no sense to continue to maintain the commercial licensing system for code of practice only species and defeats the purpose of a simpler wildlife licensing system and does not fulfil the objectives of a risk-based approach to licensing. It will create unnecessary administration for both DEH and pet /aquarium shops alike while not actually serving any tangible objective as minimum standards and welfare requirements are set out by the relevant code of practice.

If commercial licensing for code of practice species is maintained it essentially creates an uneven regulatory playing field between the hobbyist breeders who will be able to trade unrestricted and pet / aquarium shops who are not currently license holders. It would appear much of the representation on behalf of industry on the contentious issue to date has been on behalf of those wanting to protect the status quo and interests of the current commercial license holders and not the greater good of the industry.

We want to make it easy for the public to find a reputable retailer offering code of practice native animals for sale as viable alternatives to traditional pet choice options. Currently only 10 shops across NSW are able to do this meaning the public are often forced to backyard dealers through sheer lack of choice.



- The AIAA supports the proposed introduction of licensing requirements for online or backyard dealers selling reptiles in a business-like manner. To keep things as simple as possible the AIAA would suggest this is not a different class of license but the very same license with the same conditions as the current commercial license including the cost. As such if our above recommendations are adopted, this license would be required for online or backyard dealers wishing to advertise and sell any class 1 species. If our recommendations are not adopted then this would also be required for the sale of code of practice species. It is critical that a level regulatory playing field is created.

It is important to note that any measures used to determine a requirement of a commercial license should be as black and white as possible and not inadvertently capture genuine hobbyists trading in excess animals they may have bred. We think the current proposal to use ATO guidelines as the measure is open to too much interpretation and is near impossible to police and enforce. The AIAA instead suggest that a specific numerical measure of animals sold per calendar year be used instead. This number could be varied dependent upon species involved. Even this scenario is likely to be abused and would be difficult to police and enforce.

Given the backyard and online trade will likely be essentially unregulated it is paramount that pet / aquarium shops are also able to trade code of practice species without unnecessary regulation. Such an approach would also mean that valuable and finite DEH resources can be focused on the species still requiring class 1 or higher licenses.

- In the past it has taken far too long for determinations on commercial license applications to be made. The AIAA would like to see the processes, costs, procedures for applications and granting of commercial licenses (in whatever form they remain) to be simplified, costs reduced, streamlined and sped up respectively.

The AIAA will always advocate on behalf of our members for the least trade restrictive regulations possible while still ensuring that conservation objectives and minimum animal welfare standards are maintained. It is hoped that the above suggestions are adopted as the simplest and most common-sense approach in the implementation of the discussion papers proposed changes to wildlife licensing.

To ensure a greater representative cross section of industry views are fed into the policy development process, the AIAA would also be happy to participate in any future consultation or discussions around these issues as proposals are developed.

Thank you for the opportunity to provide our input into the process and we look forward to seeing the final outcome.

Sincerest Regards

Anthony Ramsey



President

Aquarium Industry Association of Australia