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Dear Wildlife Licencing Reforms team,

I coordinate OEH scientific licencing issues for Botanic Gardens & Centennial Parklands.

Thank you for the opportunity to comment on OEH Licencing reforms and the 'Draft Discussion Paper – towards risk-based approach to wildlife licences'. Botanic Gardens and Centennial Parklands has a wide range of scientific and operational areas that are conducted under OEH licences. The majority of our work is carried out under our general Scientific Licence, in particular the collection of seed and cuttings for conservation projects (such as OEH Saving our Species) and living collection display, as well as herbarium sampling for taxonomic/genetic study.

We provide the following comments on the discussion paper, where it relates to our operational areas. As a part of the DPE cluster, we would welcome the opportunity to further discuss licencing reforms and changes with the Wildlife Licencing team.

- **Bush regeneration licencing** – support the code of conduct approach outlined in the discussion paper, and recommend that AABR and Ecological Society be approached re: code of practice
Also worth noting there are now National Standards for Ecological Restoration which could also guide practitioners <http://www.seraustralasia.com/standards/contents.html>
- **Ecological burns** – licencing in the discussion paper is framed around management of pile burns associated with bush regeneration projects. Ecological burns are also used for broader scale burning in TEC remnants, eg done as a routine ecological management practice to maintain species diversity, through small patch/mosaic burning, etc.
- **Threatened species licencing** - support the retention of threatened species licencing for the collection of seed and cuttings.
- **Sale of threatened plants** - the discussion paper covers in detail the propagation and sale of protected plants, but does not cover the sale of threatened plant species where the propagation material is taken from cultivated plants in a garden/nursery situation, ie nil harvesting of material from wild populations- is this going to be covered in the licencing review?
- **Seed collecting** mentions that certain low risk activities will be done according to a code of conduct following the Florabank guidelines. Recommend that the Florabank guidelines have now been superseded by Plant Germplasm Conservation in Australia (Offord and Meagher 2009).
- **Abiotic sampling in national park estate** – support the proposed approach to licence only high risk activities, and allow small scale soil sampling without licence (with permission of Area Manager)

Regards,

Peter

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Botanic Gardens & Centennial Parklands

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