



HCN Proposed Amphibian Species List

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Compiled by the HCN Committee on behalf of our members and community.

Contributors to this document include representatives from: Australian Herpetological Society, Central Coast Herpetological Society, Hawkesbury Herpetological Society, Illawarra Reptile Society, Macarthur Herpetological Society, North Coast Herpetological Group, Shoalhaven Reptile Club, Turtles R Us, DoLittle Farms, Flora & Fauna Management Services, Wildexpos, and other private reptile keepers.

Frogs on the Species List:

The HCN primarily represents the concerns of reptile keeping community. Herpetoculture does include frogs. A large number of reptile license holders also enjoy keeping frogs with their frog keeping licenses.

We acknowledge the Frog And Tadpole Study Group (FATS) has been participating in consultations with OEH. Yet by their own admission this group *“a community group dedicated to community awareness and conservation of frogs”* (Source: <http://www.fats.org.au/>) is not a Frog Keeper Group.

It is our contention additional feedback in regards to the actual keeping of frogs should also be provided to ensure a balanced and equitable input is received by the Office of Environment & Heritage (OEH).

We are very proud of the amount of experience and expertise our members hold and are keen to share.

Some of the most important advocates promoting habitat and wildlife conservation have at some time been amphibian keepers. David Attenborough says his pet salamander as a child was critical in his development as a budding naturalist.

Despite this contribution to amphibian biology and conservation there are fervent opponents to the keeping of this fauna in captivity. These critics have significant political influence and can if left unchallenged impose a negative influence on native animal keeping regulations.

With this in mind the HCN would like to submit the following in reference to the frogs listed on the proposed Species List.

Proposed changes to the Species List

- **Completely remove the “Prohibited” species list.** We wonder why prohibition is necessary at all and would like to ascertain the justification for each species in this list, especially if a “risk based approach” was used. We can present a logical and reasoned rebuttal to the need for prohibition.
 - Prohibition removes the opportunity for amateur keepers to learn about these animals directly and to contribute to the knowledge of their biology and captive management
 - Maintaining their current status and not being prohibited will protect these species in the future. By placing them on a Prohibited List these species are automatically required to be euthanased when rescued or handed in by the public for care. It makes no sense for perfectly healthy animals to be killed. The better option is for them to be rehomed.

- Bird and reptile organisations are not removing species that are vulnerable, threatened or endangered, so why are amphibians being removed?
- If any species are rescued or come from seizures resulting of illegal activity, then as with bird and reptile licensing, advanced keepers should be able to keep them. This cannot occur, if the Species List is limited.
- The logic behind many of the species being listed as prohibited is not obvious. For example, the Broad-palmed frog (*Litoria latopalmata*) currently proposed to be prohibited, is a common and relatively easy to keep species from around Sydney. Hypothetically, some of these animals could be accidentally included in and later rescued from a load of landscaping gravel or mulch. Such animals could come into captive care but if prohibition proceeds they will have to be destroyed.
- Some of the proposed prohibited species can be collected legally under permit in the Northern Territory. For example, Dahl's Aquatic Frog (*Litoria dahlii*) is a stunningly beautiful member of the bell-frog family and like the Green and Golden Bell Frog (*L. aurea*) it is relatively easy to keep. We cannot see the logic behind these being prohibited. If geography has anything to do with prohibition, then the Magnificent Tree Frog (*Litoria splendida*) is an example of a frog species that comes from a similar region yet no such restriction applies.
- If the "Risk based approach" was used to construct this prohibited list then how does an abundant species like Broad-palmed Frog (*Litoria latopalmata*) become prohibited, yet threatened species like Giant Burrowing Frog (*Heleioporus australiacus*) be permitted?
- Collection of tadpoles for educational purposes was allowed under the National Parks Act, and we are hoping this will remain the case under the Biodiversity Act. Raising tadpoles through to metamorphosis is an educational 'right-of-passage' for many children. Unfortunately, it has also been a vector for the spread of the Chytridiomycosis. Kids will collect tadpoles and then naively release the metamorphs elsewhere. We aren't advocating banning tadpole collection, although from an ecological perspective, such metamorphs probably should be destroyed. We propose that from a conservation (education) perspective, these metamorphs could and should remain in captivity boosting captive populations and consequently protecting wild populations. No such mercy for prohibited species!
- Re-assign the proposed 'Prohibited List' to a Class 2, in some cases, Class 1. In addition to this, species that require a high level of husbandry experience, we recommend that an additional class of Amphibian License be created. That is, Class 3 (Restricted) where only proven, experienced license holders are able to receive, keep and take care of rescued frogs in that class.
- We applaud the frog species going to Code (ie no licence required). However, with the "Risk-based approach" it doesn't make sense to not include the Striped Marsh Frog *Limnodynastes peroni*. They are one of the most abundant of all frogs in their range. It is illogical if the spread of Chytrid fungus is the reason for their omission

from the Code. Regardless of licence class they always will be one of the most common frogs geographically moved by accident or ignorance.

- Currently rehoming frogs is carried out only by F.A.T.S. We propose that herpetological societies are permitted to rehome frogs with their members, conditional on current protocols for quarantine are maintained.
 - This will increase the chance of frogs finding a home as there are seven herpetological societies throughout NSW.
 - Rehab volunteers would have more hand-over options. It's not always possible to get to Sydney and handed over to a F.A.T.S committee member.
 - Frogs are being handed over to some societies already, so rehoming could be done with OEH approval instead of the current euthanasia policy. F.A.T.S does not actively encourage the keeping and breeding of frogs, while in contrast, Herp Societies do.
 - Increasing the potential to rehome frogs will help us to educate our members on the care and maintenance of amphibians using the Amphibian Code of Practice.
- The HCN acknowledges there are Species proposed to go from Class A2 to Class A1. All of these species are already in captive collection's, they are also easy to keep and breed so captive progeny could/would become readily available. These species are popular so their increased availability will be worthwhile.
 - Green & Gold Bell frogs – *Litoria aurea*
 - Southern Bell frogs – *Litoria raniformis*
 - Stuttering frog – *Mixophyes balbus*
 - Giant barred frog – *Mixophyes iteratus*
 - Great barred frog – *Mixophyes fasciolatus*
 - Orange thighed frog – *Litoria xanthomera*
- We understand the following species were proposed by F.A.T.S to go from A2 to A1 license. The Revised NSW Native Animal Keepers' Species List draft appears not to have adopted this recommendation. We would like to know the reason for this when all are low risk species, extremely common, and are well suited to captivity?
 - Rough frog - *Cyclorana verucosa*
 - Pearson's green tree frog – *Litoria pearsoniana*
 - Whirring tree frog – *Litoria revelata*
 - Crucifix frog – *Notaden bennettii*
 - Haswell's froglet – *Paracrinia haswelli*
 - Brown toadlet – *Pseudophryne bibroni*
 - Red – Backed toadlet- *Pseudophryne coriacea*
 - Southern toadlet – *Pseudophryne dendyi*
- Frog species for Fauna Dealers - currently there are 5 species proposed for sale through dealers:
 - Green tree frogs – *Litoria caerulea*
 - Magnificent tree frog – *Litoria splendida*

- Dwarf green tree frog – *Litoria fallax*
- Centralian tree frog – *Litoria gilleni*
- Red eyed green tree frog – *Litoria chloris*

Ideally, all species going to Code should be allowed to be sold through pet shops. Isn't the point of a Coded species that they are low-risk and easy to maintain?

But if this isn't an option then the following species need to be considered.

- Striped marsh frog - *Limnodynastes peronii*
- Dainty green tree frog – *Litoria gracilentata*
- White lipped tree frog – *Litoria infrafrenata*
- Peron's tree frog – *Litoria peronii*
- Desert tree frog – *Litoria rubella*
- Eastern banjo frog – *Limnodynastes dumerilii dumerilii*

Most of these species are already available through F.A.T.S and are rehomed because of the ease of keeping. They are low risk animals and already in captive collections. They are well suited to captivity and they are all going to Code (no licence required) with the exception of the Marsh frog. Why aren't Marsh frogs going to Code when it is one of the MOST abundant species available?