

Wildlife Licensing Consultation  
National Parks and Wildlife Service  
PO Box 1967  
Hurstville, NSW 1481

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## **RE: Proposed wildlife licensing reforms**

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To whom it may concern,

The International Fund for Animal Welfare (IFAW) is a global non-profit organization that protects animals and the places they call home. Why? Because we believe animals matter to people and the planet. At present some animal populations are depleting at such a rate that a single life can be the difference between losing or saving an entire species. Saving individual animals helps preserve populations and, healthy animal populations are vital in maintaining ecosystems. IFAW has been operating in Australia since 1997 with a local supporter base of over 360,000 supporters and advocates, who care passionately about conservation and welfare.

IFAW opposes the proposal to shift to a risk based approach for the regulation of certain categories of human-wildlife interactions. IFAW is particularly opposed to any deregulation current restrictions on the keeping of native wildlife. It is widely acknowledged that native wildlife have complex needs and keeping wildlife in captivity causes high levels of stress and require highly specialized care. IFAW would encourage decisions makers to implement stricter regulation of human-wildlife regulation, to ensure the welfare of native wildlife is protected and human-wildlife interactions do not pose a threat to the survival of Australian native fauna.

There is a concern that if requirements for keeping native wildlife are relaxed, individuals without the appropriate knowledge or expertise for keeping native wildlife will be responsible for caring for native wildlife which may adversely impact the animal's welfare. Reverting to a risk based approach for wildlife licensing also creates difficulties in monitoring and enforcement of regulations related to human-wildlife interactions. Reducing regulation of human-wildlife creates to essentially a self-regulated risk based approach creates greater opportunities for illegal activities that pose a threat to native wildlife.

Throughout Australia there are tight restrictions on the keeping of native wildlife for the pet trade. Australian States and Territories have jurisdiction over the protection and keeping of native wildlife. As a general rule, native wildlife cannot be taken from the wild for the pet

trade, although this does occur. IFAW is concerned that if regulation of native wildlife ownership changes from a licensing scheme to a ‘risk –based’ approach, the instance of taking of native wildlife from their natural habitats illegally could increase.

Fundamentally, IFAW is opposed to the capture, trading, keeping and breeding of wild animals for the pet trade. IFAW is also strongly opposed to the culling of any native wildlife. IFAW would advocate for the ban on commercial trade in reptiles reinstated. However, for the purposes of this consultation and within the context of the current regulations we would like to submit responses to the relevant questions.

**Should licensing be retained for all activities currently requiring a threatened species licence?**

IFAW supports strengthening of regulations relating to activities that impact on threatened species. IFAW advocates a licensing system, which is easier to enforce, than the proposed adoption of a code of conduct.

**Are there any lower risk activities formerly managed by the TSC Act Section 95 certificates that could be suitable for regulating under an enforceable BC Code of Practice?**

Without knowing the requirements of the proposed codes of conduct or the proposed enforcement of the codes of conduct, we believe that there are not lower risk activities formerly managed by the section 95 certificates that would be suitable for regulating under a BC Code of Conduct.

**Are there any improvements to licence conditions to enhance the protection of threatened species?**

The conditions of these licences should be based on animal welfare science, as well as consideration of the ecological conservation and humane treatment of wildlife. These conditions should be determined by experts with appropriate knowledge and experience to ensure the human-wildlife interaction has minimal impact on the wildlife.

**Should nominated shooters be listed on landholder licences to harm rather than issuing separate licences to nominated shooters?**

No, separate licences should be issued and restricted to the identified person for each shooter in order to maintain tight control and tracking of individuals’ eligibility.

**Can you suggest any improvements to standard conditions of a landholder’s licence to harm?**

To be able to hold a licence to harm, one must provide evidence of competent shooting to ensure that animal welfare standards aren’t compromised. When determining licence quotas, consideration of size and health of population needs to be taken into account.

**Should licencing for harm to wombats and other protected animals be retained?**

IFAW doesn’t support the infliction of harm to wombats and other protected species. If licences to harm are to be issued, they should be issued as a last resort under the strict conditions, after all humane alternatives have been exhausted, such as better husbandry or translocation. IFAW would prefer that the licensing scheme be retained as opposed to implementing a code of conduct.

**How can licence eligibility criteria and licence conditions be improved to ensure licence handlers have the competency and knowledge to safely catch and relocate reptiles?**

Licence holders should be required to undertake relevant annual training to ensure they possess and maintain the necessary skills in capturing, handling and safely relocating reptiles.



### **Do you support the proposed staged approach to implementing a risk-based approach to regulating native animal keeping?**

No. IFAW has major concerns about the welfare implications of native animal keeping. Amphibians and reptiles are highly specialized animals, with very specific environmental and dietary needs which are incredibly hard to imitate in an artificial environment. Appropriate care for wild animals requires considerable expertise, specialised facilities, and lifelong dedication to the animals. Their nutritional and social needs are demanding to meet and, in many cases, are unknown.

There is no such thing as “easy to keep pets”. Thus, most of the time, these creatures end up living in unsuitable conditions and suffer from severe stress, illnesses and behavioral problems. In Australia many of the reptiles are from captive bred sources, although there is always the strong threat of illegal capture and trade. And even those animals that are bred in captivity specifically for the pet trade once had relatives that were collected from the wild.

Importantly, the capture, transport and sale of wild animals also causes unacceptable suffering for individual animals, many of which die shortly after and as a result of this.

Studies in the USA have shown that the majority of reptile owners keep their pets for less than one year since many are unaware of the complexity, true costs and risks of having a wild animal as a pet and decide to abandon them. This has enormous implications given the animals would most likely be abandoned in environments outside their original distribution. Thus potentially introducing pathogens and diseases and threatening the genetic diversity of indigenous populations.

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

IFAW is opposed to the commercial trade in native animals and does not think they should be allowed to be sold in pet shops at all. We are therefore strongly opposed to the expansion of the list of species allowed to be sold.

Specifically, with regards to the commercial trade of reptiles, this would not contribute to the conservation of the native reptile populations and/or the conservation of the environment, which is an obligation under the Environment Protection and Biodiversity Conservation Act 1999; the NSW Threatened Species Conservation Act 1995 and the Biodiversity Conservation Act 2016 among others.

International trade in wildlife has played a central role in contributing to biodiversity decline and has contributed to the extinction of species worldwide. Many of the reptiles in the global pet trade are taken from the wild. The removal of animals from their habitat for commercial purposes often results in populations becoming threatened or endangered, thus contributing to Australia’s tragic extinction record.

The NSW government should be implementing moves to reinstate the ban on the commercial trade in reptiles, rather than expanding it. The expansion of the already substantive list of species that can be kept and traded as pets would only increase the demand, which increase pressures contributing to their threatened status, such as illegally obtaining native wildlife from the wild.

With regards to those non-threatened ‘abundant’ species, it is a dangerous assumption that abundance justifies commercialisation and a precautionary approach should be adopted instead.



Importantly, the capture, transport and sale of wild animals also causes unacceptable suffering for individual animals, many of which die shortly after and as a result of this. As mentioned above, wildlife have complex needs that often cannot be met by the average pet owner. This often leads to wildlife that have been kept in captivity surrendered to local wildlife carers who are already under resourced and overstretched.

The lifting of the ban on commercial trade of reptiles in pet shops in NSW has likely to have only fueled the demand. The fact that native animals are freely for sale in pet shops only encourages impulsive purchases hence increasing the number of individual animals suffering.

There is also an additional concern about the risk to humans from the keeping of reptiles. Reptiles are extremely complex animals of which information on their biological and behavioral needs in the wild are not completely known or understood. Therefore being able to successfully replicate these needs in a captive environment is extremely difficult. Reptiles that are not properly cared for can develop numerous health problems, some of which can be transferred to humans such as salmonella or allergies.

Should you require any further information please do not hesitate to contact me,

Kind regards,

Kelly Pearson – Program Officer – IFAW Oceania  
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