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To whom it may concern,

Please consider the below in response to the recently published proposed wildlife licensing changes for public consultation. Kur-ring-gai Council has interest in a few of the proposed changes.

Firstly, it is noted the intention of moving to a risk based approach is partially based on an desire to reduce administration and compliance costs to allow OEH to concentrate on enforcement and regulation efforts. To assist in this, we would like to make the suggestion of the investment into an online system which would allow for online application, reporting and maintenance of licenses. It is believed this could significantly reduce the administration costs involved in this process, particularly in the tracking of an application. Ideally, this system could have additional features, such as to act as a central reference point for landowners when checking licenses of external parties.

In response to part 4.3.2, in regards to proposed changes to the catch and release of possums, Council supports the replacement of licensing with an enforceable code of practice for the relocation of possums. We believe this would provide a higher degree of consistency and could be enforced by our own policies more effectively.

As per part 5.1.2 "Keeping native mammals as pets"; Kur-ring-gai council would like to request further consideration into keeping native mammals as pets. As a council with interest in responsible pet ownership and a high degree of interface between residential areas and high quality natural habitat, we see value in the potential of replacing problematic invasive pet species, with natives. It is acknowledged this could be a difficult process to ensure positive biodiversity outcomes, however it is believed that with correct breeding and licensing, this could have a net positive influence on urban biodiversity and sensitive ecosystems.

In response to Part 5.4, Ku-ring-gai council currently holds preserved specimens regularly used for educational purposes. Council would welcome the reduction in paperwork this discontinuation would offer as well as the opportunity to preserve additional specimens with greater ease, should they sustainably and responsibly become available.

Further to part 6, Council would like to suggest clarification around the requirements of non-invasive monitoring, such as bird watching, remote cameras or anabat use, being used in a non-research context. It should be recognised that these are noted hobbies for some members of the public; however some of these activities, particularly involving bird calls or flash photography, can pose harm to protected wildlife, which is an offence. It is believed a Code of Conduct for wildlife interactions could be useful in framing the requirements of these non-scientific or regulated activities.

Finally, Ku-ring-gai council would like to express interest in the related review (section 1.1.2) for wildlife rehabilitation services. Our interest in this is due to past events where sensitive species have been removed from council land, without council knowledge, by rescue bodies. We would appreciate receiving further information as this review progresses.

Please do not hesitate me for further information on any of the above.

Regards,

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