



3 August 2018

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

Via: wildlife.reforms@environment.nsw.gov.au

Re: Wildlife licensing reforms

NSW Farmers is Australia's largest state farming body, representing the majority of commercial farm businesses in NSW, ranging from broad acre, meat, dairy, wool and grain producers, to more specialised producers in the horticulture, egg, pork, oyster and goat industries. The land on which our members produce these commodities is also home to a variety of native fauna and flora which can sometimes cause disruption or damage. In this way, we appreciate the opportunity to comment on the licencing that governs human interactions with Australian wildlife.

Of the proposed reforms, the sections which are most relevant to our members, and the only sections we will address in this letter is section 4: damage mitigation licences and chapter 2: threatened species licences. We recognise the importance of legislation to protect native fauna and regulate instances where their impacts need to be managed. However there is perhaps scope to improve the processes involved. NSW Farmers supports the adoption of a risk-based approach where the highest risk activities remain subject to licencing, moderate risk activities are regulated through codes of practice, and the lowest risk activities are exempt from either.

For moderate risk, but relatively common activities such as relocation of birds or possums, we support the development of new codes of practice as an alternative to licencing. We note that matters involving wombats pose a similar level of risk, however the cost of developing new codes is perhaps not warranted by the low number of interactions with the marsupial. In the case of reptiles, we support the retention of licencing due to the higher propensity of risk to the animal and the handler. In order to decrease unnecessary administrative burden we also support the transition to a system where all nominated shooters are listed on the landholder's licence to harm rather than the issuing of separate licences.

NSW Farmers' Association

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We support the retention of licencing requirements around flying foxes due to their threatened status, however we must note that some of the stated conditions are unnecessarily onerous and do not allow sufficient flexibility. We do not support the 30 June 2020 cut-off for applying for a licence, especially since funding for exclusion netting has ended. We also do not support the condition that in a 10 year period, a licensee may only shoot during a maximum of three seasons. This restriction does not allow enough flexibility to respond to the conditions of different seasons which, in the experience of orchardists, are not routine over a ten year period.

We also note that wedge tail eagles and other raptors are responsible for significant losses of lambs, kids and other young livestock. We have heard reports from members that they have been unable to proceed with licencing even after demonstrating photographic evidence of raptor attacks. Farmers need a workable framework so they can protect their stock and remain within the law. We also call for increased research into the distribution and feeding behaviour of wedge tail eagles so their impacts on productive farming can be more widely known.

Finally, we understand that kangaroo licencing is being dealt with through separate reforms however we must use this opportunity to reiterate our long held position on kangaroo management. We strongly support the removal of the 'shoot and let lie' tagging requirements, not only during drought times, but as a response to increasingly unsustainable numbers of kangaroos across the state. Large numbers of kangaroos put extreme pressure on landholders, especially when paired with difficult seasonal conditions. In many areas of the state farmers can barely keep their own stock fed and watered, with kangaroos only exacerbating the problem. Kangaroos have been allowed to reach unsustainable numbers and now in drought they are dying from starvation and dehydration. This is an inhumane, perverse outcome of regulation to protect the species, and we believe better kangaroo management in the first case could and should prevent such situations.

Thank you again for the opportunity to comment and for your consideration of the issues raised. If you would like to discuss any of this further please contact the NSW Farmers Environment Policy team on 9478 1078.

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