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Thank you for the opportunity to submit comment on the proposed changes to Wildlife Licenses. The Parramatta Park and Western Sydney Parklands Trusts are supportive of the proposals to reduce the burden of licensing to OEH and other Government staff.

It is pleasing that the skills and experience of staff employed by Local and State Government entities and charged with managing environmental assets (flora and fauna) in the public domain is being recognised.

A majority of the licensing is of little relevance to the Trusts so no comment will be made either way. Specifically, the Trusts would like to endorse;

- a code of practice for flying fox camp management on public land
- a code of practice for harming specified bird species in circumstances and locations that present lower risk to biodiversity
- codes of practice to specific classes of scientific licenses, particularly around bush regeneration and seed collection.

It is suggested that along with the code of practice, it would be beneficial to have an accreditation scheme that ensures those responsible for managing sites or undertaking actions that align with the code of practice, have the necessary qualifications and knowledge. The accreditation could be a simple online system for certain sections, to training courses for more complex processes. The accreditation could be outsourced to TAFE or other providers with renewal dates at one to three year intervals pending anticipated changes to codes or requirements for refresher courses (similar to First Aid courses). The code of practice could then require that activities undertaken onsite must have an accredited person present at all times.

The benefits of accreditation flow both to OEH and to land managers;

- Cost of accreditation is born by the individual or individual's work place
- Collection of data requirements, as required now under licensing, could fall under the accreditation requirements.
- Land Managers can include accreditation as essential criteria when tendering

Use of an accreditation scheme may give rise to more use of codes vs licensing, particularly under scientific licenses.

As a specific note on scientific licenses for bush regeneration and seed collection. A large number of sites under bush regeneration are in Endangered Ecological Communities (EECs) and part of the process is to harvest and broadcast seed or germinate for revegetation. It would be advantageous to ensure that a code of practice / license change allows for seed collection and reuse of seed (for direct seed or propagation of tube stock) under a code of practice for all species and communities when undertaken in the same site.

If any follow up is required or requested, I am happy to assist.

Yours sincerely

David Kirkland | Principal Program Officer, Environment
Parramatta Park & Western Sydney Parklands Trusts

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M: Level 7, 10 Valentine Avenue, Parramatta, NSW 2150

M: PO Box 3064 Parramatta NSW 2124

W: www.parrapark.com.au | www.westernsydneyparklands.com.au

Facebook: [/parrapark](https://www.facebook.com/parrapark) | [/westernsydneypark](https://www.facebook.com/westernsydneypark)

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[We acknowledge and respect the Traditional Owners and Custodians of the Lands on which we work.](#)

