

Wildlife Licensing Consultation
Office of Environment and Heritage
PO BOX 1967
HURSTVILLE NSW 1481

23 July 2018

Dear sir/madam

Submission on wildlife licensing reforms

Thank you for the opportunity to comment on the discussion paper – *Towards a risk-based approach to wildlife licences*.

In general, Sydney Wildlife is opposed to a lessening of wildlife regulation for all but the lowest risk activities. Our objections to weakening the current wildlife regulations are based on concerns over:

- Animal welfare through poor husbandry, trading, harming or relocating wildlife.
- Illegal trading, including take from the wild.
- Releasing unwanted native animal pets into local bushland.
- Releasing catch and release animals in unsustainable numbers into local bushland.

Sydney Wildlife believes that through licensing, government has a communication channel with commercial operators and hobbyists, in which to provide regular advice on implementation of codes of practice, the introduction of new policies and procedures, and to alert the industry and hobbyists of emerging issues.

We do however, support simplification of the licensing regime, and the avoidance of unnecessary administration and duplication, where this can be demonstrated to have no adverse impacts on wildlife welfare and conservation status.

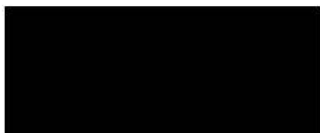
In response to the proposals made and the discussion questions posed, Sydney Wildlife holds the following views.

Topic	Reference	Comment
Flying foxes	2.3	Sydney Wildlife supports the retention of licences for harm (including shooting or non-lethal dispersal) of flying foxes. The reasons are: flying foxes include species that are threatened in NSW, flying foxes may carry diseases transmittable to humans, animal welfare concerns, and a lack of suitable foraging and camp habitat.
Wombats	4.2.3	Sydney Wildlife supports the retention of licences for harm to wombats.
Commercial wildlife enterprises	3.3, 4.3.2, 4.4.2,	Sydney Wildlife supports the retention of licences for commercial wildlife trade and enterprises, such as emu farming, taxidermy, pet shops, catch and release possum and reptile handlers. It is important that there continues to be government oversight of these commercial enterprises to enforce animal welfare and husbandry standards, prevent 'take from the wild' and to prevent dumping of unwanted or displaced animals into the wild.
Pet trade	5.2.3	Sydney Wildlife supports the retention of licences for pet shops that trade in native wildlife, and recommends that all commercial

		wildlife breeders and traders be licensed, including home or web-based enterprises.
Catch and release providers	4.3.2, 4.4.2	<p>Sydney Wildlife supports the retention of licences for catch and release providers (both possum and reptiles). The reasons are: the risks posed from handling venomous snakes; the high potential value of reptiles in the illegal trade market; and the dumping of removed possums in Sydney bushland parks by catch and release providers.</p> <p>Sydney Wildlife has no objection to removing the requirement for private landholders to obtain a licence to remove a possums from their buildings if they are using a licensed catch and release provider, and information on the landholder and number of animals relocated is recorded and submitted to OEH.</p>
Abandoned, escaped or seized pets	5.1.3	<p>Sydney Wildlife will like to be consulted on any proposed changes to the current regulations and practises for managing abandoned, escaped or seized native animal pets.</p> <p>Volunteer wildlife rehabilitation organisations, including Sydney Wildlife, currently receive and temporarily care for these animals, however government should not expect that we would provide this service without recompense into the future.</p>
Animal keeping licences	5.1	Sydney Wildlife supports the risk-based approach to regulating native animal keeping.
Preserved specimens	5.4.2	Sydney Wildlife supports the proposal to remove the licensing requirement for holders of preserved specimens that were sourced legally.
Licence fees	7.2	Sydney Wildlife does not support any application of licence fees to wildlife rehabilitation organisations. Our work is carried out on a voluntary basis and is a 'public good'. We provide a service that would otherwise need to be provided by government. It would be unreasonable of government to expect a volunteer organisation to pay an annual fee.

The Sydney Wildlife Board is very happy to meet further with you to clarify any of the issues or concerns raised in our submission. We look forward to seeing the detailed reforms covering the wildlife rehabilitation sector later this year.

Yours sincerely



Deborah Kerr
Board Chair
Sydney Metropolitan Wildlife Services