

Wildlife Licensing Reforms - Have Your Say
Office of Environment and Heritage
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Submission to:

Wildlife Licensing Consultation,

National Parks and Wildlife Service

Submitted by

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All Codes General

Monitoring of the Codes. As currently written, under the sections “*Acquisition and Disposal*”, the codes allow unregulated trading (swapping, barter, giving or occasional selling) between individuals. This raises the question of how does one know who is keeping animals and whether or not they are adhering to the Codes? It is foreseeable that many people may not follow the code requirements for appropriate care of the animals leading to an increased mortality rate among captive native animals. Under the present licensing system there is a record of the people keeping native animals and this licensing requirement is a major deterrent to frivolous keeping of native animals. The *Discussion Paper* contains no strategy by which it would be possible to assess the efficacy of the proposed Codes.

Social media dealings in native animals will make it very difficult to detect infringements of these Codes.

Preface, 3rd Dot Point. I suggest delete the phrase “...or a code of practice” to avoid any confusion by persons thinking that these Codes allow them to collect animals from the wild without any restriction.

Knowledge of Species Identification. The Codes allow for unregulated movement between animal keepers and there is no mechanism to prevent persons receiving an animal, which is not listed in the Schedules for the Codes. The Codes rely on individuals being able to identify accurately the species that they have received. Potentially this opens the door for illicit dealings in native animals.

Discussion Paper

Damage Mitigation Licences. Licences for the landowner and for the shooters should be maintained. The reason being that a shooter nominated on a landowner’s licence may not be available when the mitigation measures are required. The time required to have a new shooter endorsed on a landowner’s licence could take too long, especially with ripening crops, and by the time a new shooter is endorsed the damage has been done.

Wombats. The licence to harm wombats should be retained. In the absence of a licensing procedure for wombats it would be too easy for people to use frivolous reasons for killing wombats.

Possums. The licence for removing possums should be retained and this would operate similar to kangaroo licensing. The removal of nuisance possums should not operate under a Code because it would be too difficult to ensure that people correctly followed the Code’s procedures.

Reptiles. Retain the licence as it is at present. An improvement may be to offer training or work experience at a zoo or similar institution in the handling of reptiles, particularly for persons wanting to obtain a licence or changing their licence to a higher licence class.

Keeping and Dealing Licences. The current system of dealer licences for pet shops and similar should be retained, and to include individuals who deal from a

home using social media or other on-line electronic communication. However, a reptile dealer licence of \$800 per year would deter many, if not most, individuals from applying for a licence and so would potentially conduct an undetected trade in animals.

Scientific Licences. I support the suggest combining of licence classes 2 and 3. I suggest also that this new class includes provision for occasional educational “show-and-tell” occasions to cater for requests from school groups or adult groups such as Probus Clubs. These “show-and-tell” occasions may involve holding captured animals for 1 to 2 days and released immediately after the event.

Although the ACEC is under the *Animal Research Ct 1985*, the annual renewal of the Research Authority is apparently excessive administration, especially when there are no changes to the research or ecological surveys. Certainly annual reports are valuable but the annual fee of \$100 with the renewal seems excessive. From an administrative perspective it would be a simpler procedure to have the Authority to run for the three-year duration of the Research Protocol.

Specific Codes

Code for Keeping Native Frogs. Agree with the re-classification of the species as listed, and that no additional species should be included under the Code.

Code for Keeping Native Birds. Several species that are proposed to be added to the Keepers’ list should be withdrawn from the list. These include the three Chat species: *Ephianura albifrons*, *E. aurifrons*, *E. tricolor*. The reasons being that these species are sparsely distributed throughout their natural distribution in New South Wales. There is a case for a B1 or B2 classification for these species.

The fourth species that should not be included in the Code is the Silvereye, *Zosterops lateralis*, because of the difficulty of distinguishing the New South Wales resident race from the Tasmanian race, *Z. l. lateralis*, which migrates to southern New South Wales during late autumn and returning to Tasmania in early spring. This annual migration probably has an important function in maintaining the viability of the Tasmanian race and unregulated keeping of this race could potentially have deleterious impacts on the Tasmanian race.

Code for Keeping Native Reptiles, Schedule. The inclusion of Appendix A: Reptile categories and behaviour, which lists many more species than the Code, is confusing and gives the impression that all these species are covered by the Code. The Tables in Appendix A should only include the 15 species covered by the Code.