

17/6/2018

Dear Queensland CCBFA affiliate clubs

RE: Queensland Wildlife Licensing – DES meeting report 14/6/2018 Brisbane

On June 14th 2018 Gary Fitt (QFS and NFSA President) and I, Sam Davis (CCBFA President) met with senior DES staff in Brisbane to discuss the recently released Queensland *Consultation Regulatory Impact Statement (RIS), Reviewing the framework for the management of protected wildlife (animals) in Queensland under the Nature Conservation Act 1992*. Unfortunately, Lyle Holmes (QCBS President) was unable to attend due to illness – Lyle met with DES as part of the Wildlife Advisory Committee the week prior. Reptile representatives met with the same DES staff earlier in the day.

The RIS and other details, plus a survey are here -

<https://www.qld.gov.au/environment/plants-animals/wildlife-permits/framework-review>

The meeting was most encouraging with DES staff eager to listen and understand our concerns over the current proposal. We presented each of the following points. It was clear and agreed by all present that further consultation on most of these matters is required.

1. Process and consultation has been poor to date. The first task is to ensure full and proper consultation occurs, so a sensible stakeholder supported approach to native animal licensing is achieved. Reviews, such as this process, occur at minimum only once every 20 years. It is well worth the effort (and time) to get it right.

DES staff expressed their intent to consult - they are keen and willing to listen to concerns.

2. The object of the Nature Conservation Act 1992 is “the conservation of nature” (s.4), achieved “by education and cooperative involvement of the community”(s.5(a)) and “sustainable use of protected wildlife” (s.5(e)). Aviculture wants to, and does, have these same objectives. It should be noted that most of our species have no potential to affect wild populations directly.
3. The RIS completely ignores unlicensed operators. It seems obvious that most poaching will be undertaken by unlicensed operators – criminals don’t put their hand up! Compliance operations detailed throughout the RIS are dealing with those trying to do the right thing. Working with licensees to foster trust is the way forward.

DES staff noted there has been instances where poaching by licensed keepers had been identified via the licensing system including where the licensing system had been used to hide illegal take from the wild. We are unaware of such cases and requested further details.

4. Purpose of Movement Advice system is unclear. Submissions recommended scrapping the system (we agree) – why is this not addressed in the RIS? There is no evidence MA system has any benefit. Going online benefits staff in terms of “time and effort” (p31), but for what? Assertion that MA system will reduce illegal trade (p32) is not supported by any evidence.
5. Movement Advice system is costly – potential to reduce licence fees significantly if MA system is scrapped. 46% of compliance costs are on MA administration (p12), yet the impact assessment makes it clear existing MAs have not been collated (p29) so 46% underestimates what the true cost should be.

Significant disagreement over the purpose of the Movement Advice system to identify illegal take from the wild. DES staff were under the impression there was support for Movement Advices if in online form, from all stakeholders – they now know this is not the case. We have requested further evidence to justify the significant resources proposed to be directed towards both Movement Advices and proposed ongoing near real time online data collection.

6. The proposed advanced licence fee for breeding Class 1 or 2 species – \$685 for 3 years will not be paid by anyone. Provided most of the commonly kept species move to exempt, a licence fee to breed and trade Class 1 and 2 species should be in line with the current specialist licence fee ~\$200 for 3 years.

DES staff objective is to simplify the existing system by reducing complexity – a valid aim. There is no doubt they accept our concerns with the current proposal. Throughout the meeting a number of positive thoughts on resolving concerns were discussed. Further work is needed; however DES staff are keen to work with us to reach consensus.

7. System for moving species onto species lists and between classes is needed. A risk assessment tool with a consultative committee (that includes avicultural representation) as the assessment panel is needed. Consider specifying species lists outside the Act or Regs (refer to from the Act/Regs) so lists can be altered without political involvement.

DES staff expressed there is no administrative reason editing a schedule within the Regulations cannot take place regularly, such as annually. We encourage DES to implement a system such that this can occur.

8. There are further avian species that should be moved to exempt. Others from Class 2 to Class 1. This improves cross-jurisdictional regulation with other states. We recommend alignment of the Qld exempt list with the NSW code-based list. If this occurs, then the large majority of keepers will not require a licence.

In principle, cross-jurisdictional alignment of species lists is supported. We have been asked to assist by proposing initial species lists for the new Regulation and will do so. It was noted that moving most common aviculture species to exempt would alleviate most concerns as licenses would no longer be required for the bulk of aviculturists.

9. The 5 bird no breeding licences make no sense. Aviculture is about breeding birds through improved husbandry practices. Companion species are largely exotics or exempt species so licensing is irrelevant for these “Pet” birds. Class 2 birds are on the whole, relatively rare in captivity and all keepers should have the intention to breed these species - softbill breeders will not sell birds to people who do not intend to breed.

Changes to the specialist licence to allow larger numbers and breeding were discussed throughout the meeting and is certainly under serious consideration.

10. Most proposed Class 2 birds are unsuited to pet shop style sale, in any case commercial operators are unlikely to see value in Class 2 birds. These softbill species have little commercial value and are traded at minimal or no cost in other jurisdictions. The zoo community often is closely aligned and obtains much of their bird collection from private softbill breeders.

Further discussion with DES is required. It was noted that welfare issues are not the direct concern of the Nature Conservation Act 1992, so are somewhat peripheral to this review. I (Sam Davis) will also seek comment from the pet industry via the Pet Industry Association of Australia (PIAA).

At this stage we are confident a sensible system will result. We thank DES staff for their commitment to engage and look forward to ongoing negotiations over the coming months.

We will continue to provide updates to clubs as the review progresses. Your feedback is encouraged.

Kind regards



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