

21/6/2018

Hi everyone

RE: NSW Discussion Paper, Towards a risk-based approach to wildlife licences – Bird Group Notes

These notes are to assist those attending the OEH consultation meeting in Parramatta on the morning of Saturday 23/6/2018. They have been circulated and agreed to by a range of bird club representatives and dealers, including those CCBFA know to be attending the bird group session.

In general, the transition to a risk-based approach to wildlife licencing outlined in the discussion paper continues to be supported. The movement of most current class 1 species to a code-based list will remove the need for the majority of aviculturists to hold a licence or submit annual returns. This is a sensible reform thoroughly supported by the avicultural community.

Nevertheless, there are some issues.

1. Licences for animal expos (p33,34) are NOT supported and will be strongly opposed by the avicultural community. Bird sales and other club events are and have been successfully self-regulated forever without issue. Transactions at these events are between seller and buyer, the club simply provides the venue. We have a self-regulated code of practice for bird sales which focuses on the welfare of all birds at all such events, not just licensed natives.
2. A "Dealer's licence" should NOT be required to trade commercially in code-based species (p34). If private persons can trade code-based species freely then the same must be true for Pet Shops who are thoroughly regulated via DPI. The current proposal is discriminatory and unworkable.
3. We strongly oppose the proposed "Commercial dealing in native animals, other than a pet shop" (p33,34) licence class for birds. Such a licence goes well beyond the object of the BC Act and is an ATO matter, or perhaps at best a DPI POCTA matter. The rationale applies to all animals, native or exotic, and to all businesses. The move to online trading is prevalent in most retail sectors and attempts to influence such trade has a history of unintended consequences.
4. There is no mention of the continuation of the Native Animal Keepers Consultative Committee (NAKCC) or its equivalent. A consultative group is central to the ongoing success of this risk-based approach to managing wildlife interactions, including the fulfilment of many of the discussion paper proposals. The continuation of NAKCC or its equivalent has been a central recommendation of bird groups and reptile groups. Who has opposed this recommendation? And why has the continuation of NAKCC (or similar) not been proposed in the discussion paper?
5. Proposing to include exempt species as code-based species (p29) is unexpected and strongly opposed. It opens up a whole raft of issues that have clearly not been considered by OEH and are well outside the scope of the BC Act. This is a potentially significant issue for all exempt species but particularly problematic for thoroughly domesticated species such as Budgerigars, Zebra finches, Cockatiels and the like.
6. Anomalies in the draft Revised NSW Native Animal Keeper's Species List require further consultation and editing, particularly parrot, finch species proposed for B2 (p8,9 of draft Species List). Certainly *Poephila cincta cincta* is in error as the subspecies is very common in captivity and the species is duplicated as is already listed as code-based.

7. Bird groups continue to support the addition of further mammal species to the species list. We strongly refute the current uninformed OEH policy statement on mammals (p29) which is universally debunked by all scientific and keeper literature. OEH must encourage native mammal keeping – it is central to the recommendations of the Independent Biodiversity Legislation Review Panel and must be re-examined.
8. A range of problems with the draft Code of Practice for Keeping Birds including, but not limited to, the following.
 - Standard 3.1.5 needs work, particularly if it is to apply sensibly to exempt species (which is proposed). We are unclear on the purpose of this restriction and how it helps achieve the purpose of the BC Act.
 - Standard 4.1.1 is unachievable in its current form, particularly for exempt species. There will be enormous non-compliance with this standard and little hope of enforcement success, and all for what purpose?
 - Guideline 4.2.1 is best covered within the DPI code and does not cover the basics of disease diagnosis in any rigorous manner.
 - Guideline 4.2.2 is nonsense - bird keepers use leg rings to identify birds, with microchipping reserved for some particularly high value species.
 - The Notes at the bottom of page 4, although well meaning, are best included in the DPI code.

Saturday is a chance for OEH to present the discussion paper and for us to put issues on the table. The expert bird group is scheduled to meet early July – that group will address the above and other wildlife licensing matters together with consideration of the NSW DPI Keeping and Trading of Birds code and related DPI matters. CCBFA will then prepare a formal submission. We are also assured further opportunity to meet with OEH as the review is finalised.

Sincerely,



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