

4/6/2018

RE: Non-releasable native animals outcomes review

We accept that historical OEH data shows few avian species are suited to rehousing and hence the absolute numbers available for rehousing with private licensed keepers is perceived to be small. We presume this to be the reason our recommendations for rehousing non-releasable natives with private keepers has been overlooked in the current draft. We make the following points in this regard.

1. Rehabilitated wild birds and other native species are being moved into private hands without OEH knowledge. We have no way of determining the extent of this currently illegal activity, nevertheless we are of the view that in general this is an ethical movement that best caters for the welfare of the animals. Hence our expert group B.4 recommendations in the following document which were also noted in our 2/3/18 communication to this matter.
<https://www.ccbfa.org.au/wp-content/uploads/2018/02/expert-group-recommendations-210417.pdf>
2. In other jurisdictions, in particular South Australia, non-releasable native animals are legally and routinely moved to private licensed keepers. We are unaware of any negative consequences to this practice.
3. Species not on the current private keeper species lists can easily be added or a restricted licence can be approved for individual animals as has occurred previously.
4. There is a push to have a range of native mammals placed on private licence species lists. Assuming this is successful, then the expertise and number of private mammal keepers will grow. These keepers will provide an expert resource for housing non-releasable mammals.
5. The last dot point under 25 Permanent care with licensed rehabilitators, states OEH will consider permanent rehousing with a rehabilitator when "The animal will be used in an authorised breeding program." We question the need for rehabilitators to be provided the opportunity to breed animals in captivity. Breeding should be restricted to private keeper BC Act licensees, EAP Act licensees or Scientific licences under the AR Act.

We look forward to working through the more significant issue for bird groups involving the rehousing of animals determined to be native animal pets.

Sincerely,



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