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10/07/2019

Pest Animals Declaration
c/- Environment Division, Environment, Planning and Sustainable Development Directorate
GPO Box 158
Canberra City ACT 2601
ACTBiosecurity@act.gov.au

Dear Conservator of Flora and Fauna,

RE: Proposed Amendments to the Pest Plants and Animals (Pest Animals) Declaration. Discussion Paper. May 2019. (Pest Animal Discussion Paper).

Canary and Cage Bird Federation of Australia represents some 250 avicultural (bird) clubs throughout Australia, including all avicultural clubs operating within the ACT. We represent clubs on a range of government committees in all jurisdictions.

As a general principle CCBFA does not support prohibition of avian species that are maintained in our affiliate club member's aviaries. There is no evidence of escaped aviary bred birds establishing sustainable wild feral populations in Australia. Exotic birds that have established are the result of deliberate introductions of wild birds substantially in the early 1900s or prior.

We recommend, as we have done in other jurisdictions, declaring just the "wild" populations of species, as is already the case for the Northern Mallard *Anas platyrhynchos* and Rock Dove/Common Pigeon *Columbia livia*.

The Pest Animal Discussion Paper proposes to declare the following avicultural species as pest animals with no additional restrictions on keeping. We are concerned public submissions may promote prohibition, with which we strongly disagree.

- European Goldfinch Carduelis carduelis
- Monk Parrot Myiopsotta monachus
- Indian Peafowl Pavo cristatus
- Alexandrine Parrot Psittacula eupatria
- Indian Ringneck Parrot Psittacula krameri
- Barbary Dove Strepropelia roseogrisea

There are substantial captive aviary populations of all the above species throughout Australia. CCBFA recommends that it is the "wild" populations of these species that are declared. We can provide further evidence supporting this recommendation – for instance the three parrot species above have established sustainable populations in a range of urban environments across the globe (not Australia), however in all cases this has been accompanied by support from local residents in the form of feed, housing, artificial nests, etc. Goldfinches bred in captivity would have no chance of survival in the wild, furthermore their diet does not compete with our native finch species. Education of the community is key.

The following species are proposed to be declared as prohibited pest animals which we understand would mean they can no longer be kept in aviculture within the ACT.

- Canada Goose Branta canadensis
- House Sparrow Passer domesticus
- Common Blackbird/Eurasian Blackbird Turdus merula

For the above three species we recommend either removing the prohibited designation or restricting the prohibited declaration to "wild" individuals. Captive bred House Sparrows and Common Blackbirds are not sufficiently acclimatised, predator aware, etc. to survive in the wild without assistance. Canada Geese are currently rare in captivity in Australia, therefore expensive potential keepers would certainly maintain them in large covered enclosures.

There was general agreement at the 4/6/19 meeting in your office, in particular from the Conservator of Flora and Fauna, that birds in aviaries are not the issue, it is preventing their escape and the establishment of wild populations that needs to be addressed. We reiterate our commitment to promote aviary management strategies that minimise risk of escape. Aviculture is open to working with government to notify escapes, assist with recapture and report feral incursions from NSW. Again, education is key in this area.

We are aware of and support the submissions from the Canberra Finch Club and from ACT aviculturist Adam Fitzgerald regarding this matter and thank them for their comments on specific species.

Avicultural representatives are currently working together to produce an evidence-based submission that tables and recommends non-native avian species for the exempt list based on the document *Changes to Licences for Keeping Non-native Animals under the Nature Conservation Act 2014. Information Paper* and our meeting with the Conservator's office on 4/6/2019. We envisage finalisation of this submission in early August and have a commitment from the Conservator's office for a subsequent meeting to explain in person.

We are impressed with the commitment of the Conservator's office to engage and look forward to ongoing consultation. Please do not hesitate to call for further clarification of any of the above matters.

Kind regards,

Sam Davis

President – Canary and Caged Bird Federation of Australia Inc.

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