

18/9/2020

To whom it may concern

RE: Import risk review for psittacine birds from all countries – Draft Report

This document is in response to the following “Draft Report” released for comment July 2020 and available online from the following URL.

<https://www.agriculture.gov.au/biosecurity/risk-analysis/animal/psittacine-birds>

Canary and Cage Bird Federation of Australia Inc. (CCBFA) currently represents 247 affiliated bird clubs nationally who’s collective membership is conservatively in the tens of thousands.

We congratulate the team at Department of Agriculture on the thoroughness and completeness of the Draft Report.

In general terms CCBFA supports the proposed risk management measures within the Draft Report. Please keep this in mind as you read the following recommendations and submission that follows.

- Recommendation 1.* CCBFA continues to recommend a regulated import regime that is economically viable, whilst protecting the biosecurity and biodiversity of Australia’s captive and wild birds. Such a system will deter smuggling (including poaching).
- Recommendation 2.* To prevent irresponsible reporting, CCBFA recommends the BIRA includes an unambiguous statement making it clear that imports will be restricted to captive bred birds from approved countries.
- Recommendation 3.* CCBFA recommends the requirement for BC3 level quarantine at Mickleham be reassessed.
- Recommendation 4.* CCBFA recommends imports from New Zealand (NZ) be considered as a special case. This includes consultation with NZ regarding potential reciprocal arrangements for both imports and exports.
- Recommendation 5.* CCBFA recommends welfare of birds during the quarantine period is addressed. CCBFA welcomes the opportunity to draft a set of welfare standards/guidelines to assist.
- Recommendation 6.* CCBFA recommends review of the Draft Report and approval of the psittacine BIRA occurs in a timely manner and that officers reviewing the live import list and CITES regulation are able to begin their work forthwith.

I look forward to further consultation as the BIRA is finalised.

Kind regards,



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CCBFA Submission

Import risk review for psittacine birds from all countries – Draft Report

Recommendation 1

CCBFA continues to recommend a regulated import regime that is economically viable, whilst protecting the biosecurity and biodiversity of Australia's captive and wild birds. Such a system will deter smuggling (including poaching).

CCBFA recommends a simplified regime for both import and export much like that in force for other captive bred species such as dogs, cats, horses, etc. for the following reasons.

1. If the import procedure is too complex, unviable economically or otherwise overly onerous for the size or type of import shipments sought then its usefulness as a deterrent to smuggling will not be realised.
2. CCBFA accepts smuggling of psittacines into Australia continues to occur and must be stopped. For dogs, cats, horses and other captive bred animals including poultry and pigeons little if any smuggling occurs due to import regimes accepted as appropriate by importers.
3. As a consequence of 1 and 2 above, CCBFA continues to recommend BIRA reviews include assessment of the significant biosecurity risk of smuggling as a major risk factor. This has not occurred and is a major oversight in this process.

Recommendation 2

To prevent irresponsible reporting, CCBFA recommends the BIRA includes an unambiguous statement making it clear that imports will be restricted to captive bred birds from approved countries.

1. Ongoing misinformation from activists, some media outlets and sadly, recently, from Birdlife Australia ignorantly attempts to link imports (and exports) to wild caught birds.
2. CCBFA, on behalf of our current membership of 247 affiliated clubs nationally is totally opposed to international trade in any wild caught indigenous birds with the exception of specific approved threatened species captive breeding programs.
3. All proposed trade relating to this Draft Report is in captive bred birds, many generations from their wild counterparts.
4. CCBFA accepts this matter is not the direct responsibility of those preparing and approving the BIRA, however it is a necessary inclusion to deter misinformation.

Recommendation 3

CCBFA recommends the requirement for BC3 level quarantine at Mickleham be reassessed.

1. BC3 and use of Mickleham will be expensive and will requires large shipments that increase financial risk for importers should disease be identified.
2. The Draft Report does not clearly articulate why a BC3 level of quarantine is required.

3. CCBFA understands many other species are quarantined to protect against airborne viruses, bacteria, etc. in lower level facilities. We wish to understand and explain to our affiliate clubs why psittacine viruses and bacteria require higher levels of quarantine in comparison.
4. Why must the Mickleham BC3 facility be used? What is the reasoning for not allowing other approved private, zoo or university facilities?
5. BC3 and Mickleham are likely the most expensive and highest risk elements of the import process. CCBFA supports minimising the cost of imports including allowing for economically viable shipments of varying sizes which will significantly reduce incentives for smuggling.

Recommendation 4

CCBFA recommends imports from New Zealand (NZ) be considered as a special case. This includes consultation with NZ regarding potential reciprocal arrangements for both imports and exports.

- a. In particular, for a team of Budgerigars from New Zealand competing in the annual Australian National Budgerigar Council (ANBC - <https://anbc.iinet.net.au/>) National Exhibition.
- b. In general, to simplify the exchange of parrots between Australia and NZ due to lower biosecurity risks compared to other countries.

We make the above recommendation based upon the following reasons.

1. New Zealand Ministry of Primary Industries is currently working on a draft import health standard to allow the importation of live parrots into New Zealand. It is an opportune time to ensure both country's import procedures work in parallel.
2. CCBFA understands many of the disease agents of concern in the Draft Report are not present in New Zealand.
3. The NZ budgerigar fancy has utilised the ANBC standard and has had ANBC trained judges for decades in anticipation of one day being able to compete in the ANBC national show.
4. The ANBC National Exhibition already has thorough biosecurity regulation. Teams from each jurisdiction are housed separately under the supervision of an avian veterinarian at all times. The birds from each team only meet on the main stage to be judged publicly. At no time are birds from different teams in physical contact.
5. Work to enable an NZ team to travel and compete in Australia was undertaken before the early 1990s prior to approval of the previous psittacine BIRA. Unfortunately, those involved in this earlier effort are now elderly or, sadly in a number of cases, have passed away.
6. CCBFA President, Sam Davis, has made initial contact with authorities in both NZ and Australia to discuss the above. CCBFA and parties representing Budgerigar interests in both NZ and Australia look forward to further consultation.

Recommendation 5

CCBFA recommends welfare of birds during the quarantine period is addressed. CCBFA welcomes the opportunity to draft a set of welfare standards/guidelines to assist.

1. The range of psittacine species that could be potentially imported is extensive. Each of these species requires specific expertise, care and husbandry to ensure the highest levels of welfare are ensured.

2. Operational details in terms of the BIRA/quarantine procedures will likely involve the following, assuming the Draft Report in its current form is approved. There are numerous welfare concerns to consider at all stages of the import process.
 - a. At least 35 days quarantine and testing pre-export in the source country under the control of a vet employed or approved by the government of the source country.
 - b. Transport to Australia which involves a range of biosecurity checks and balances. All shipments must arrive into Australia at Melbourne airport.
 - c. Finally, 15 days in the Biosecurity Containment Level 3 (BC3) facility at the new Mickelham facility on the outskirts of Melbourne.
3. All three of these periods (2a, 2b, 2c above) are likely managed by different personnel with different levels of expertise. Standards and guidelines will be required to not just ensure biosecurity but to ensure welfare.

Recommendation 6

CCBFA recommends review of the Draft Report and approval of the psittacine BIRA occurs in a timely manner and that officers reviewing the live import list and CITES regulation are able to begin their work forthwith.

1. CCBFA acknowledges and respects the research that has gone into the Draft Report, nevertheless the process at this moment has taken decades.
2. Unfortunately, there are few resources directed towards preventing smuggling and increased funding for such efforts is unlikely. CCBFA views a legal pathway for psittacine imports (and exports) as a priority.
3. Assuming the psittacine BIRA is approved in similar form to the Draft Report the following will need to occur before any birds can enter the country, particularly listed CITES species which accounts for many psittacine species.
 - a. Species must be on the current live import list. This in itself will likely be a time-consuming undertaking for species not currently on the list. The current list is here - <https://www.environment.gov.au/biodiversity/wildlife-trade/live-import-list>
 - b. The species must be able to be traded under CITES. Currently Australia's interpretation of CITES would prevent many species obtaining the required CITES paperwork. Appendix A details a CCBFA recommendation regarding CITES to the review of the federal EPBC Act 1999.

Appendix A - CCBFA recommendation regarding CITES

Inconsistencies between the current EPBC Act and CITES obligations...

CCBFA supports simplifying regulated international trade in captive bred birds, particularly to deter smuggling. There are anomalies in our EPBC Act 1999 that do not reflect CITES and that are currently incentivising smuggling.

Examining the text of CITES, in particular Article VII...

<https://www.cites.org/eng/disc/text.php>

CITES Article VII (4) states captive bred Appendix I species for commercial export are to be treated as Appendix II species, therefore Article IV applies. Article IV regulates trade in Appendix II species, it requires captive proof from the exporter, however there are no import requirements (from CITES).

And perhaps even more convincing is CITES Article VII (5). This clause makes it clear that captive bred animals require no CITES documentation apart from a captive bred assurance from the Management Authority of the State of export.

Resolution Conf. 10.16 (Rev.) further expands on this notion.

<https://www.cites.org/eng/res/10/10-16C15.php>

Australia has not implemented Article VII (4) or (5) so far as I can tell. We believe as a signatory, we are obliged to do so. We suggest a subsection, say "303FKA Import of captive bred CITES listed species" to correct this omission and if accepted solve the problem.

CCBFA offers its expertise to draft a proposed subsection 303FKA.