

16/9/2021

Opposition to a National Registration Scheme for Native and Exotic Live Birds

CCBFA and its affiliated clubs nationally totally and adamantly oppose even the notion of a National Registration Scheme for Native and Exotic Live Birds. On this we are unanimous in our resolve and willingness to fight.

We do not understand how this proposition for a National Registration Scheme for Native and Exotic Live Birds has expanded from the following KPMG Review Recommendation 8.

8. Establish a registration scheme to prove lineage of specimens to be exported, including a consideration of DNA testing requirement.¹

This recommendation clearly states “specimens to be exported” NOT all birds as is implied by the survey title. The survey has caused untold concern from our affiliate clubs and their numerous members. Clubs recall the disastrous failed NEBRs scheme and are astonished such a notion has resurfaced. It is a widely held view that such schemes only benefit one (or maybe a few) large commercial interests and the smugglers.

Recommendation 8 specifically requires “consideration of DNA testing requirement” This is not addressed as part of the survey. I am personally confident this part of the recommendation is due to discussions I had with the KPMG consultants regarding DNA parentage testing protocols for birds intended for export. DNA parentage testing is now viable and should form the scientific backbone of ensuring only captive bred birds are traded across our borders.

Our recent document titled “Proposal for a DNA Parentage-based Export Protocol²” provided to ThinkPlace and DAWE details our recommended DNA Parentage protocol and is to be considered as the core of this submission and is included as Appendix A.

CCBFA current stance on export (and import) of birds supported by all clubs remains as follows. It is this stance that underpins all CCBFA action and recommendations regarding this matter.

CCBFA supports and encourages a simplified export system for birds known to be aviary bred. Essentially captive bred birds, whether native or exotic, should be treated in the same manner as dogs, cats, and other routinely exported (and imported) species (except for threatened species within captive breeding programs). This is THE way to deter smuggling, as there is not and will not ever be sufficient sustainable funding to enforce border controls. The only proviso is to include safeguards to ensure captive numbers within Australia for each exported species remain sustainable.

¹ KPMG Independent Review, Regulation of the export of native and exotic birds for the Department of Agriculture, Water and the Environment: <https://www.environment.gov.au/system/files/pages/f0e28291-cffd-4dbf-87f6-12cd76fea3a6/files/kpmg-native-and-exotic-bird-export.pdf>

² CCBFA Proposal for a DNA Parentage-based Export Protocol: <https://www.ccbfa.org.au/wp-content/uploads/2021/09/ccbfa-DNA-parentage-protocol.pdf>

CCBFA is of the view surveys such as the one on the “Have your say”³ site are difficult to construct without bias. In this case the survey presumes a national registration scheme to be a reasonable option to consider. In essence it suggests a national registration scheme as the only possible solution to the export problem and therefore does not encourage alternative solutions. Responses are limited to support or lack of support for such a scheme, in particular questions 6-9.

6. *What issues or opportunities could a national registration scheme address, with respect to how the export of native and exotic birds works currently?*
7. *What effects, positive or negative, might a national registration scheme for the export of native and exotic live birds have?*
8. *How could a national registration scheme for the export of native and exotic live birds work in a practical sense?*
9. *What technologies can most viably underpin a national registration scheme for the export of native and exotic live birds?*

It is for this reason that CCBFA has chosen not to answer the survey and instead makes this submission. We have, for simplicity, recommended our clubs and their members respond to the survey questions by simply and clearly stating their opposition to any national registration scheme.

CCBFA looks forward to and welcomes further consultation.

Regards



Sam Davis
President - CCBFA

³ Have your say survey https://haveyoursay.awe.gov.au/registration-scheme-for-native-and-exotic-live-birds/survey_tools/registration-scheme-for-native-and-exotic-live-birds

CCBFA Submission

The remainder of this submission summarises, under five broad themes, CCBFA opposition to a National Registration Scheme for Native and Exotic Live Birds whilst promoting our stance on export (and import) and reinforcing our recommended “Proposal for a DNA Parentage-based Export Protocol⁴”.

Please be clear that our “Proposal for a DNA Parentage-based Export Protocol” remains central to this submission – for clarity it is reproduced as Appendix A.

I. Conservation and Biodiversity

Aviculture has changed significantly over the past 50 years. It is no longer acceptable (or legal) to take from the wild except for specific approved conservation or research projects. Aviculture is strongly opposed to poaching and smuggling, particularly of threatened species. The vast majority of aviculturists in Australia and internationally are conservation focussed.

Superficially, respondents to the online survey may conclude that registering all birds nationally, particularly those species listed on one of the CITES appendices, may be advantageous in terms of conservation of biodiversity. In fact, the opposite is true. Compliance with such registration systems cannot and will not ever be enforced to a level even remotely close to where they will achieve any protection. Perhaps more significantly, such registration systems enable smuggled and poached birds to be legitimised via registration. This occurs with the current EBRS system and was a major problem with the old NEBRS system as explained in the Background Notes within Appendix A.

What about registration restricted to threatened species, or even a subset such as only endangered and critically endangered species? Again, superficially this appears to have some merit and no doubt some respondents will argue in favour, however in reality many threatened species are common in aviculture, for example, Swift Parrots, Princess Parrots, Scarlet-chested Parrot, Gouldian Finch, Black-throated Finch, and many more native species. Similarly for numerous common in aviculture exotic species. A system that requires such species to be registered is a major disincentive to hobbyists, and hence they avoid these species resulting in a reduced captive population. When the captive population is low then genetic variability suffers and the conservation benefits of a sustainable captive population are lost. We have seen this occur with state government licencing for a number of species. In addition, such schemes can create a sinusoidal market where prices rise as species numbers become critically low, leading to those seeking a quick profit entering, numbers rise rapidly exceeding demand and so they plummet once more and so it continues – definitely not a desirable outcome for the species.

Supporting the maintenance of large sustainable captive populations preserves the species in the long term and minimises all incentive to poach from the wild.

The observations and husbandry skills of aviculture are critical to numerous threatened species and related research projects domestically and internationally. This avicultural knowledge has been refined over numerous decades, in some cases centuries. There are numerous texts, journals and more recently web-based resources produced by aviculturists that are invaluable to threatened species efforts both for in-situ and ex-situ conservation efforts.

⁴ CCBFA Proposal for a DNA Parentage-based Export Protocol: <https://www.ccbfa.org.au/wp-content/uploads/2021/09/ccbfa-DNA-parentage-protocol.pdf>

We recommend our “Proposal for a DNA Parentage-based Export Protocol” is implemented. Under Australia’s CITES obligations we must ensure exports are restricted to captive bred birds. A national registration scheme cannot do this, in fact any such scheme will enable precisely the opposite.

II. Economics – viability

What is the size of the flock and how many bird keepers?

The size of the flock of captive birds in Australia is difficult to determine with any precision, however it certainly exceeds 1 million. The number of bird keepers again is difficult to quantify. CCBFA has approximately 230-240 affiliated clubs. We do not know the number of members each club has, however some have many hundreds of members, whilst other have less than 50. Guessing, and it is a guess, at an average of say 80 members per club results in the number of club members totalling approximately 20,000. We often use a rule of thumb that around 10% of aviculturists are club members, so an estimate of approximately 200,000 aviculturists is a reasonable estimate. This number excludes those with a pet budgerigar or canary, these are people with multiple birds or an aviary who would consider aviculture to be a hobby.

How would you identify and contact the estimated 200,000 bird keepers nationally?

Avicultural clubs can communicate with their members, so the first 10% is relatively easy to inform. The remaining 90% will be extremely difficult (expensive) to identify let alone contact. This was one of the major early failure indicators on the NEBRS. Minutes of the very first meeting of the Exotic Birds Committee on 10-11 February 1997 make it clear registrations were lower than expected, and it is clear they never improved significantly during the life of the scheme. People simply were unaware the scheme existed or did not engage sufficiently to register. There were insufficient financial resources applied to marketing the scheme and few financial resources directed at improving compliance levels. Economically this would most certainly be the case today for any national registration scheme.

So what are the ongoing costs?

Imagine it is possible to identify all these people and the scheme is operational. So 200,000 people are registered along with the more than 1 million birds they keep. To manage such a scheme would require a team of staff at the Department of Agriculture, Water and Environment along with all the allied resources. Clearly such a scheme will require many millions of dollars annually to administer once it is operational.

Clearly any scheme that attempts to register birds nationally will cost tens of millions of dollars to setup and many millions annually to administer, and even then, it is doomed to failure. Success without DNA parentage tests will enable not prevent smuggling and poaching.

Note our DNA parentage system (Appendix A) in comparison has trivial associated costs with the significant proportion recouped as charges to exporters.

III. Biosecurity

Border controls to ensure pathogens do not enter Australia or leave Australia are possible when there are high levels of compliance with import and export protocols, and enforcement is sufficient to minimise illegal smuggling activity. Currently this is not the case and will not be the case should a national registration scheme for birds be implemented.

Under the previous NEBRS system and even currently under the voluntary EBRS regime, there is smuggling and as discussed above and within Appendix A any national registration scheme is

doomed to the same fate. Smuggled birds are obviously not subject to biosecurity controls and hence pathogens can and no doubt do enter the country along with illegal birds.

CCBFA's DNA parentage system (Appendix A) will minimise biosecurity concerns. It minimises smuggling and therefore ensures birds leaving and entering the country pass through appropriate biosecurity controls.

IV. Compliance outcome

The logistics of successfully enforcing compliance for a flock of over 1 million birds and perhaps 200,000 bird keepers is clearly daunting. As discussed above, it has been tried before with failure the result. Furthermore, there is no incentive for illegal operators to register with a national scheme and plenty of disincentives.

Currently state-based native licensing schemes have or are in the process of transitioning to risk-based systems where the majority of native bird keepers will no longer require a keeper licence. The high rates of non-compliance are a significant reason for this transition, but not the only reason. The state schemes were no longer fit for purpose, the same applies to a national registration scheme.

CCBFA's DNA parentage system (Appendix A) will minimise smuggling so enforcement needs reduce in parallel. Our recommended system includes only those bird keepers directly involved in export, therefore managing compliance is realistic and achievable.

V. Animal Welfare

A national registration scheme would, we presume, require all birds, millions of birds, to be permanently identified. This has ramifications in terms of animal welfare. The most common means of permanent identification is closed metal rings with implanted microchips being used for some large high value parrots.

CCBFA provides closed rings to its network of affiliate showing clubs nationally who distribute and record all ring numbers distributed to each of their members— a complex and significant undertaking. We do not distribute microchips and there is no national registry in place for bird microchips, some dog and cat registries are able to include birds, however to our knowledge use of such registries is rare.

Closed rings are applied to birds whilst young and still in the nest. Once a ring is applied the birds leg grows in size such that the closed ring is unable to be removed and more importantly the closed ring cannot be placed on a bird once fully grown. The precise size of the ring is critical to avoiding welfare issues.

Generally closed rings are used for show birds and some high value parrots. Show birds are selectively bred to a standard so generally single pairs are housed alone, and the nest or nest box is designed to enable close monitoring and access to chicks for welfare checks and to apply closed rings at the appropriate age. The appropriate age being when the leg is still small enough to receive the ring, any sooner and it will fall off, any later and the leg will be too large.

Applying closed rings to show birds has few welfare implications when done correctly. Aviculturists engaged in the show side of the hobby are instructed on the correct ring size, timing and technique very early – it is one of the first skills learnt and clubs routinely provide training. However, instructing and skilling the general bird keeping public on the technique and timing for hundreds of different species is another matter entirely. There are significant animal welfare consequences for rings applied inappropriately, including:

- Oversize rings can result in legs getting caught on branches, wire and other items within the bird's environment. Larger rings can also rise above the knee and then cause circulation issues. They are also liable to fall off, negating their purpose.
- Rings that are undersize will damage the bird's leg. It is not unknown for such rings to cut circulation completely resulting in loss of the leg completely.
- Many species, particularly when bred in aviaries, will desert nests if interfered with. The chicks then die of starvation or cold.
- Some species (and individual birds) will reject chicks sometime after rings are applied. Careful observation is always required to ensure parents have accepted and continue to accept ringed birds.
- Even for the domesticated show Budgerigar there has been issues with particular coloured rings. The international Confédération Ornithologique Mondiale (COM) defines the precise colour of rings to be used each year on a six-year rotating cycle. CCBFA complies with this colour rotation. Much work has gone into selecting and modifying these six colours to minimise welfare issues.

Microchips are only suitable for larger birds and should be applied by a veterinarian or other qualified professional. The microchip itself is relatively inexpensive, however the cost to apply is significant both economically and in terms of inconvenience. Permitting unqualified people to install microchips is not recommended – a thorough knowledge of bird anatomy and sterile equipment usage, along with technique training is required to prevent animal welfare issues.

Blood sampling for DNA-based identification is somewhat invasive as it also requires the bird to be caught and blood sampled, usually from a toenail or blood vessel under the wing. Bird clubs routinely educate their members on appropriate techniques as DNA sexing is now a standard process for numerous species in aviculture. There are of course welfare concerns associated with such a process when done without appropriate training.

If blood sampling became a requirement under a national registration scheme, then an extensive national training program would be required to train bird keepers who are not members of clubs.

During export (or import) birds are transported in darkened boxes of a size that restricts movement. Sufficient food and water (or moisture in some other form) is provided. The requirements for specific species varies considerably and there is much to consider – too much to detail in this submission. For some species each bird should be transported alone and even out of sight of other birds, for others the opposite, namely a number of birds per transport box is appropriate. Expertise on each species' specific needs is required if animal welfare issues are to be managed and minimised.

Current International Air Transport Association (IATA) requirements are rudimentary at best. Should international imports and exports become more common then CCBFA would be keen to assist in the development of more robust guidelines for transport.

In terms of animal welfare, a system such as our recommended "Proposal for a DNA Parentage-based Export Protocol" ensures only birds intended for export and their parents are subjected to any procedures that have potential animal welfare consequences. A national registration system subjects all birds to such concerns.

8/9/2021

Proposal for a DNA Parentage-based Export Protocol

CCBFA and its clubs nationally wish to work with government to stamp out the illegal bird trade. DNA parentage testing is now viable and should form the scientific backbone of ensuring only captive bred birds are traded across our borders.

Changes to the *Environmental Protection and Biosecurity Act 1999* (EPBC Act)¹ as detailed in Supplement B are recommended to implement this proposal and to meet Australia's obligations as a signatory to the *Convention on International Trade in Endangered Species of Wild Fauna and Flora* (CITES)².

CCBFA current stance supported by all clubs is as follows.

CCBFA supports and encourages a simplified export system for birds known to be aviary bred. Essentially captive bred birds, whether native or exotic, should be treated in the same manner as dogs, cats, and other routinely exported (and imported) species (except for threatened species within captive breeding programs). This is THE way to deter smuggling, as there is not and will not ever be sufficient sustainable funding to enforce border controls. The only proviso is to include safeguards to ensure captive numbers within Australia for each exported species remain sustainable.

Aim

1. To ensure all CITES listed birds (see Supplement A – CITES listed avian species in Australia) exported from Australia are captive bred as required for Australia to meet its obligations as a signatory to CITES, in particular CITES Article VII(5)³.
2. To remove incentives for smuggling and poaching of all Australian native and exotic avian species held in aviculture through the design of a robust, accessible, and economically viable export (and import) system for captive bred birds.

Background Notes

1. The compulsory *National Exotic Bird Registration Scheme* (NEBRS) closed in 2002 and was replaced with a voluntary scheme known as the *Exotic Bird Record-Keeping Scheme* (EBRS)⁴ or EBRKS in some references. Both the mandatory NEBRS scheme and the current EBRS scheme utilises Movement Transaction Records (MTRs) in an attempt to prove parentage back to legally

¹ Environmental Protection and Biosecurity Act 1999
http://classic.austlii.edu.au/au/legis/cth/consol_act/epabca1999588

² CITES <https://cites.org/eng/disc/text.php>

³ CITES Article VII <https://cites.org/eng/disc/text.php#VII>

⁴ Compliance and record keeping guide for ownership of exotic birds in Australia
<https://www.environment.gov.au/system/files/resources/7b158178-166e-4d39-8630-26af806a9ddd/files/compliance-record-keeping-guide-ownership-exotic-birds-australia.pdf>

sourced birds. Neither scheme used or uses DNA to either prove parentage or as unique identifiers.

2. The NEBRS and EBRS schemes are flawed and there was and is widespread concern of significant fraudulent activity.
 - a. Both NEBRS and the current EBRS schemes attempted to manage the issues using the technologies available at the time. DNA testing techniques are now far more refined and reliable including in a legal sense.
 - b. During the creation of the NEBRS, many species were added to the *Inventory of Exotic (non-native) Bird Species*⁵ known to be in Australia that were not actually in the country. Many of these species are now present in Australia. In effect NEBRS enabled these species to be laundered into Australian aviculture.
 - c. The data entered on Movement Transaction Records (MTRs) relies on the honesty of the individual completing the MTR. If the birds, often as eggs, have been smuggled into the country or poached from the wild and the MTR claims they have been captive bred in Australia neither the NEBRS or EBRS was or is able to detect the deception.
 - d. EBRS is a voluntary scheme and is not well supported. There is widespread, albeit hearsay, that a good number of MTRs are fraudulent being used to legitimise illegally (both smuggled and poached) obtained birds and improve their marketability.
3. Restrictions on exports (and imports) to “zoos” and for other non-commercial purposes as legislated in EPBC Act *Division 5--Concepts relating to permit criteria* will continue to encourage smuggling and poaching. A robust, accessible and economically viable export (and import) system is required – this is THE way to deter smuggling and poaching of birds.

DNA Parentage Protocol

DNA parentage testing utilises a suite of markers which can provide a high probability that a bird is the offspring of two parents. It can quantify differences in the DNA of purported parents and their purported offspring. A marker not present in either parent’s DNA that is present in the offspring DNA proves conclusively that the bird is NOT the offspring of either parent.

All birds (parents and offspring) sampled as part of this export protocol require a visual or microchip identifier. This could be a ring, a missing toenail or some other feature that generally allows an individual bird to be distinguished efficiently from other birds. These identifiers are to simplify matching DNA samples to individual birds. These identifiers can be copied or cloned so are not reliable unique identifiers in their own right.

1. DNA sampling as part of the export application process
 - a. DNA sampling takes place in the exporter’s aviaries where the birds intended for export (export birds) are normally housed.
 - b. A trusted observer (approved by Government) must be present during DNA sampling.

⁵ 2007 Inventory of Exotic (non-native) Bird Species known to be in Australia
<http://www.environment.gov.au/biodiversity/wildlife-trade/publications/2007-inventory-exotic-non-native-bird-species-known-in-australia>

- c. DNA sampling is based on small blood samples which can be simply taken with no risk to the bird.
- d. Two blood samples are taken from the parent of each export bird.
- e. Two blood samples are taken from each export bird.
- f. The visual (or microchip) identifier of each bird is recorded with every blood sample.
- g. The trusted observer verifies they witnessed the blood sampling of all birds and that all blood samples are recorded with the correct visual (or microchip) identifier.
- h. The trusted observer to be a Justice of the Peace, or some other trusted person or notary whose identity and honesty is beyond reproach. Conditions required to be a trusted observer pre-approved by the Department.
- i. The trusted observer role is required to ensure all birds from which blood samples are collected are indeed located within the exporter's aviaries. This ensures blood samples from birds in the wild are not collected.
- j. It is acknowledged that both parents and offspring may have been taken from the wild (or smuggled into the country). The signed export application form to include a declaration that all parent birds have been obtained legally and all offspring have been bred in captivity.
- k. Note that other strategies for verifying captive bred F2, F3 and beyond generations are cumbersome and provide no more surety than the declaration described here.
- l. CITES does not require F2, F3 captive bred assurance when the species "has been demonstrated to be capable of reliably producing second-generation offspring in a controlled environment"⁶ which is precisely the reason parrots and passerines in aviculture are in aviculture.

2. Verification of DNA parentage

- a. DNA parentage tests are performed using one set of DNA blood samples by a laboratory contracted to perform the tests by the Wildlife Trade Office of the federal government Department of Agriculture, Water and Environment.
- b. DNA parentage tests are charged to exporters on a user pays cost recovery basis.
- c. Trusted observer credentials are verified.
- d. Good and proper type background checks of exporter performed.
- e. If all is positive then a certificate to comply with CITES Article VII(5) is issued stating Australia is satisfied the birds are captive bred.
- f. Export permit issued under Australian Law.

⁶ CITES 2 b) ii) C. 2. <https://cites.org/eng/res/10/10-16C15.php>

3. At the border

- a. Export birds are presented to border control staff who take, or witness the taking of, two DNA blood samples from each bird.
- b. The visual (or microchip) identifier is clearly noted alongside each DNA blood sample.
- c. Shipment leaves Australia.
- d. During the next week or so the border collected DNA samples are tested against the DNA samples collected at the exporter's aviaries (1 above) to ensure the birds exported are the exact individuals on the application.
- e. Prosecution of non-matching DNA to be severe.

Many thanks to all who contributed to the compilation of this document.

Sam Davis
President – CCBFA
president@ccbfa.org.au

Supplement A – CITES listed avian species in Australia

1. All parrots (apart from the 4 very common captive species below), are listed on CITES Appendix I or CITES Appendix II⁷.
 - a. Budgerigar *Melopsittacus undulatus*, Cockatiel *Nymphicus hollandicus*, Peach-faced Lovebird *Agapornis roseicollis* and Indian Ringneck *Psittacula krameri* are the only parrots NOT listed on any of the CITES appendices. All are extremely common aviary and pet birds globally.
2. There are four species of passerines common in Australian aviculture that are listed on CITES.
 - a. The Red Siskin *Carduelis cucullata* is a passerine on Appendix I. Australia is actively involved in the recovery of this species led by the Smithsonian⁸. The expertise of Australian aviculturists is keenly sought to refine husbandry as part of the project⁹.
 - b. The southern or white-rumped subspecies of the Black-throated Finch *Poephila cincta cincta* is a native species listed on Appendix II. In aviculture this subspecies is known as the Parson Finch and is very common and well established in aviculture globally including Australia. Aviculture is involved in the recovery of this threatened species via a range of initiatives, most recently the “Help find the Black-throated finch in NSW and surrounds” project¹⁰.
 - c. The Java Sparrow *Lonchura oryzivora* listed on Appendix II is a free breeding and very common aviary bird globally including within Australia.
 - d. The European Goldfinch *Carduelis carduelis* was recently listed on Appendix III by the Ukraine. Goldfinches are common in aviculture and there is a large and secure feral population in Australia.
 - e. The Green Strawberry *Amandava formosa* is on Appendix II. There are still some in Australia.
3. Some other CITES listed species are present in small numbers within private collections, and within zoological and wildlife parks.
4. Requiring registration of all CITES listed birds nationally will not work to the positive benefit of wild populations of listed species. It will be a huge disincentive leading to less people keeping these birds and there will almost certainly be massive non-compliance. Both these outcomes are at cross purposes to the intent of CITES and our EPBC Act.

⁷ CITES Appendices <https://cites.org/eng/app/appendices.php>

⁸ Red Siskin Initiative <https://www.redsiskin.org/>

⁹ Red Siskin husbandry video during a Smithsonian visit to Australia <https://youtu.be/ktRf4liHw2w>

¹⁰ Help find the Black-throated finch in NSW and surrounds <https://www.facebook.com/blackthroatedfinchproject>

Supplement B - Changes to the Environmental Protection and Biosecurity Act 1999 (EPBC Act)¹¹.

1. Changes to the EPBC Act are needed to implement Australia's obligations under CITES with regard to captive bred birds.
2. CCBFA supports simplifying regulated international trade in captive bred birds, particularly to deter smuggling. There are anomalies in our EPBC Act that do not reflect CITES and that are currently incentivising smuggling.
3. CITES Article VII¹² (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).
4. 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.
5. Resolution Conf. 10.16 (Rev.) further expands on this notion.
<https://www.cites.org/eng/res/10/10-16C15.php>
6. Australia has not implemented Article VII (4) or (5) so far as we 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.
7. CCBFA offers its expertise to assist drafting a proposed subsection 303FKA to resolve the issue.
8. Note the above advice has been provided to government as part of the recent EPBC Act review and directly to Hon Sussan Ley MP, Minister for the Environment as recently as 23/2/2021. A copy of the letter to the Minister is here - <https://www.ccbfa.org.au/wp-content/uploads/2021/02/ccbfa-minister-letter-230221.pdf>

¹¹ Environmental Protection and Biosecurity Act 1999
http://classic.austlii.edu.au/au/legis/cth/consol_act/epabca1999588

¹² CITES Article VII <https://cites.org/eng/disc/text.php#VII>