

29/6/2023

The Director
Live Import List and CITES Policy Section
Department of Climate Change, Energy, the Environment and Water (DCCEEW)
GPO Box 3090
Canberra ACT 2601
Email: exotic.species@dcceew.gov.au

RE: Proposal to delete unassessed psittacines from the Live Import List¹

The Canary and Cage Bird Federation of Australia Inc. (CCBFA) is a national federation of approximately 250 avicultural (bird keeping) clubs. Our member clubs include those supporting a large and broad range of bird species.

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).

We continue to work with those tasked to complete the Psittacine BIRA at the Department of Agriculture, Fisheries and Forestry (DAFF). We recently recommended and had accepted experts to DAFF for appointment to a Scientific Advisory Group (SAG). The SAG is tasked with making similar assessments regarding biodiversity consequences as those underpinning this DCCEEW proposal. This process and the work of the SAG overlaps significantly.

CCBFA is disappointed that we have not been approached or consulted. We are the peak body representing aviculture, including parrot keepers and breeders, nationally and should have been included in consultation well in advance of the proposal being released for public comment.

The review of the Psittacine BIRA has been underway for in excess of a decade and we have presented numerous data sets and references to a range of different federal officers and consultants which detail the matter. It would appear that our work in this area may have been overlooked. A starting point to address this could be for DCCEEW officers, with the support of CCBFA representatives, to review the wealth of documents and data on this subject that the CCBFA has researched, compiled and publicly shared over recent years.

There are a range of implied assertions within the report that indicate significant bias, which is likely a consequence of a lack of experience and knowledge by researchers of the avicultural hobby. This has been an ongoing issue. We have often been completely overlooked, despite offering our assistance, by many exotic incursion researchers, including some referenced in the proposal. There is a significant body of evidence refuting the claims that captive bred birds are likely to establish feral populations anywhere in Australia. We look forward to a meeting to explain and provide evidence.

There is insufficient time to prepare a full list of references and accompanying data to support our submission. Instead, we make the following points and look forward to discussing each in detail.

¹ <https://www.dcceew.gov.au/sites/default/files/documents/unassessed-psittacine-proposal-report-2023.pdf>

1. All species listed on the current Live Import List are already present in Australian aviculture. The risks of escape and establishment is not affected by the import of a relatively few captive birds to improve the genetic diversity of stock.
2. We must emphasise strongly that all birds intended for import will be from proven captive bred stock.
3. The species on the Live Import List together with numerous other psittacine species held in Australian aviculture have been escaping captivity for over 100 years despite our best efforts. None have established sustainable feral populations. The majority of feral populations established internationally are either due to the deliberate release of groups of wild birds or they are supported populations in urban centres.
4. To date the Indian Ringneck *Psittacula krameria* and the Alexandrine *Psittacula eupatria* are the only two exotic psittacine species claimed to be breeding in the wild in Australia. We suspect Alexandrines may be misidentified Indian Ringnecks, in any case both are common species in aviculture with an acknowledged risk of establishment, particularly in urban areas. More money has been spent discussing this issue than it would take to simply remove the birds. We regularly rehome lost birds through our club network and have offered to trap or otherwise eradicate both these species to no avail.
5. A rigorous, thorough, time consuming and expensive process was undertaken in the 1980s to compile the current Live Import List. To simply put all this work aside is unconscionable.
6. The aim of enabling a legal, accessible import path for psittacines is to disincentivise smuggling. The birds are already coming into Australia illegally with no checks. It is clear there will never be sufficient compliance funding to enforce our border controls. A legal pathway is the best way to protect Australia's biosecurity and biodiversity.

We request an urgent meeting to discuss our concerns.

For your information, this correspondence will be publicly available via our website www.ccbfa.org.au.

Kind regards,



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