



Reviewing the framework for the
management of protected wildlife
(animals) in Queensland under the
Nature Conservation Act 1992

Submission from
Australian Veterinary Association Ltd



29 June 2018

About us

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Our 9500 members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, livestock and wildlife, conservation and zoo animals. Government and institution employed veterinarians work with animal health, public health and biosecurity. We also have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the Association. The AVA has a range of special interest groups (SIGs), allowing members with shared interests or expertise to develop their practice and skills in a specific area. These include Conservation and Biology and Animal Welfare and Ethics, Public Health, Equine and Cattle and Sheep.

Comments and recommendations

The AVA supports the intention to modernise the system for keeping and trading protected animals; strengthening conservation outcomes and streamlining the regulatory framework, while reducing the administrative burden, and agrees with the assessment of the inadequacies of the current system.

The AVA supports in principle the framework of the recommended option, being:

- commercial wildlife licences and recreational wildlife licences be replaced by new licence categories that focus on the number and species of animals that can be kept, and the capacity for trading protected animals;
- the fees for the new licence categories reflect cost recovery to the government for administering the licences and implementing a risk-based proactive compliance approach;
- records must be submitted to the department within 24 hours of a record event occurring – predominantly through the department's online system – replacing the current requirement to just record the event on the day it occurs in a book held by the licence holder; and
- the unregulated take of protected scorpions, spiders, and least concern amphibians for recreational purposes be replaced by the requirement for a relevant licence, and purchase of the animals from a licenced seller.

The details of this framework, as presented are changing to this licencing structure:

- Standard licence (\$59.20 for 5 years)
 - 'Basic' animals
 - Limits on numbers (proposed max. of 5)
 - No breeding
 - Trading within 6mths only in 'exceptional circumstances'
 - Optional online record book, annual return
- Specialised licence (\$316.90 for 5 years)
 - 'Basic' and 'specialist' animals
 - Limits on numbers (proposed max. of 5)
 - No breeding
 - Trading within 6mths only in 'exceptional circumstances'
 - Mandatory online record book
- Advanced licence (\$682.90 for 3 years)
 - 'Basic' and 'specialist' animals
 - More than five animals permitted
 - No limits on breeding
 - No limits on trading
 - Mandatory online record book

Welfare and Codes of Practice:

The AVA assumes that the current Codes of practice will continue to be a requirement of licence holding.

<https://www.ehp.qld.gov.au/assets/documents/plants-animals/wildlife-permits/cp-wm-captive-reptile-amphibian-husbandry.pdf>

<https://www.ehp.qld.gov.au/assets/documents/plants-animals/wildlife-permits/cp-wm-aviculture.pdf>

The intent of the code of practice is to ensure adequate welfare, couched in terms of:

The basic requirements for the wellbeing of native animals are:

- a) appropriate and sufficient food and water to sustain health and vitality;
- b) sufficient area with appropriate environmental features to maintain their wellbeing and in which they can exhibit normal behaviour;
- c) protection from predation;
- d) protection from injury and disease, including providing veterinary treatment;
- e) protection from extremes of climate, particularly when young or injured; and
- f) protection from pain, distress and suffering.

The AVA wishes the COP to continue to be a requirement of licence holding.

Concerns:

Proposed maximum of numbers: The AVA has concern that a proposed maximum of 5 animals for each of the standard and specialised licence holders is excessively small. The discussion paper estimates that 85% of Recreational Wildlife licence holders keep 5 animals or less, and only a further 5% keep up to 10 animals. Within the suggested framework, the financial penalty for having more than 5 animals is very high, and we believe unfairly so. Even with this data, the number of licence holders that would require to transition from a specialised licence to an advanced licence is just under 362. While some of these licence holders will be trading and breeding, not all will be doing so. **The AVA proposes a limit of 10 -15 animals.**

Humanely disposal of live offspring: The prohibition against breeding for standard and specialised licence holders is supported by the AVA. The AVA has some concerns about the requirement to humanely dispose of live offspring and would appreciate some clarity around permission to trade in exceptional circumstances, and the regulatory framework around that. Some potential welfare issues may be:

- Owners less likely to put laying substrates in enclosures with gravid females, which may predispose to dystocia.
- Owners may be inclined to release unintended live-born young, which will contaminate the genetics of wild animals, be a welfare issue, and be a potential introduction of disease into the wild.
- Euthanasia needs to be performed by competent operators, preferably veterinarians to ensure the welfare of the animals.

Correction: There are two typographical errors on page 66. The species name for the Bourke's parrot is *Neophema bourkii*, and the species name for the budgerigar is *Melopsittacus undulatus*.

Summary of recommendations

- The AVA recommends a limit of 10 - 15 animals for the standard and specialised license holders.
- The AVA recommends that there is clarification around permission to trade in exceptional circumstances to ensure unintended adverse welfare outcomes are eliminated.
- Euthanasia needs to be performed by competent operators, preferably veterinarians to ensure the welfare of the animals.
- Ensure that compliance with the current Codes of Practice will continue to be a declared requirement for licence holders.

The Australian Veterinary Association thanks the Queensland Government for the opportunity to comment on this strategy.

Contact details

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