

Decision Regulatory Impact Statement

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

Prepared by: Conservation Policy and Planning, Department of Environment and Science

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Executive summary

This Decision RIS outlines the Department's final preferred policy position to update the regulatory framework for *keeping* and *taking* native animals in Queensland. This includes establishing a risk-based licencing framework for *protected animals*, shifting to an online *record*-keeping system, restricting unregulated *take* of certain *protected animals*, and various administrative updates.

Background

The conservation and management of *protected animals* in Queensland is regulated under the *Nature Conservation Act 1992* and subordinate legislation including the Nature Conservation (Wildlife Management) Regulation 2006, the Nature Conservation (Administration) Regulation 2017, and the Nature Conservation (Wildlife) Regulation 2006, collectively referred to as the *Nature Conservation Regulations*. These work in conjunction with Conservation Plans to establish an integrated and comprehensive State conservation strategy for protecting *native wildlife*.

The Queensland Government is currently undertaking the most comprehensive review of licences to *keep* native animals since 2004. The objectives of the review are:

- modernising the system for *keeping* and *trading protected animals*;
- improving the ability to investigate illegal wildlife *trade*;
- strengthening conservation outcomes; and
- streamlining the regulatory framework and reducing administrative burden

The department has aimed to achieve these objectives in a way that is responsive to stakeholder feedback and consultation, and where regulation is in line with the risks posed by various activities.

Consultation RIS

To achieve the objectives of the review, the department released the 'Consultation *Regulatory Impact Statement: Reviewing the framework for the management of protected wildlife (animals) in Queensland under the Nature Conservation Act 1992*' (the Consultation RIS). This Decision *Regulatory Impact Statement* provides a summary of the feedback that the Department of Environment and Science (the department) received on the Consultation RIS, learnings from the consultation feedback, revisions that arose as a result of this feedback, and a cost benefit analysis of this revised final proposed option.

Consultation was undertaken between 24 May 2018 and 29 June 2018. However, extensions to the submission period were provided upon request. The Consultation RIS focussed on three problems with the current framework for *recreational wildlife licences* and *commercial wildlife licences*. These were discussed under the following headings:

- the licencing requirements and *record*-keeping requirements facilitate illegal trafficking and *trade* in *protected animals*;
- the unregulated *take* of animals from the wild threatens the long-term viability of wild populations; and
- some provisions create unnecessary regulatory burden, are unclear, or are overly complex.

Under the current licencing framework, recreational licence holders have no limits to the number of animals they may *keep*, breed or *trade*. There is evidence that this has led to the establishment of a surrogate market, while allowing licence holders to disguise the illegal *take* or purchase of animals. This growing recreational market is, in some way, a result of the current framework's unbalanced management of the commercial wildlife market, where industry faces tighter restrictions on the type of animals that can be *traded*.

A related issue is that the current system of hardcopy licencing hampers compliance action around wildlife *trade*. As the department cannot actively monitor all of the more than 30,000 physical *records* regularly, it is quite easy for persons involved in *illegal trade* to falsify *records*, and conceal illegal activity. This also makes compliance inefficient and slow to respond.

Finally, the scientific community has raised concerns with the current unrestricted *take* of protected scorpions and spiders, and least concern amphibians from the wild. This has been identified as a threat to their conservation,

potentially threatening the long-term viability of regional and localised populations.

The Consultation RIS presented a number of options to address these three problems, and proposed a policy position for public consultation (the preferred option). Each option presented was analysed in relation to its potential impact on business and industry, the government, and the community. However, as identified in the Consultation RIS, this analysis was based on a number of assumptions, as the department had very limited information in relation to the numbers and species of animals that people *keep*.

In general, maintaining the status quo was not seen as a feasible option, as it did not achieve the objectives of the review or address the issues with the current framework. Meanwhile, the restrictions on licence holders under the non-preferred options were seen as too relaxed, and did not achieve the objectives of the review. To gain a better perspective on the potential impacts of regulatory changes, the department put the Consultation RIS up for public consultation.

Public submissions on the issues and options were invited through direct mail to the department, email to the department, and through an online survey. Release of the Consultation RIS was complemented by an email to 30,113 people – predominantly *recreational wildlife licence* holders – inviting comment. Public engagement also occurred through website updates, social media posts, a departmental media release, and meetings with targeted stakeholder groups.

In total, the department received submissions from 95 people, as well as 869 responses to the online survey. Of the 869 survey respondents, 581 identified as holding a *recreational wildlife licence*. This represents approximately 1.9% of *recreational wildlife licence* holders at the time.

Although the consultation proposal provided a cheaper licence to an estimated 78% of existing licence holders, the consultation feedback raised concerns about a number of elements of the proposed preferred option, as follows:

- the maximum limit on the number of animals permitted under a *standard licence* or *specialised licence*;
- limitations on breeding under the *specialised licence*; and
- the proposed categorisation of certain species (exempt, class 1 and 2 and prohibited).

The proposed categorisation of species was designed to classify animals by the level of compliance risk posed by *keeping*, *trading* and/or breeding the animals. This classification was based on criteria including the extent to which the species is kept, the ease of *keeping* the animal or risk to public safety, and the conservation risk posed to the species from poaching.

The overwhelmingly consistent feedback on the proposed options highlighted the need to review the Regulations. Currently, there are limited requirements for people to provide detailed information on the number and species of animals they *keep* and *trade*, compromising the department's ability to administer the framework in an informed manner.

Final proposed position

The consultation feedback provided the department with significant data that allowed the development of a revised proposal that better meets the needs of pet *keepers*, hobbyists, and larger-scale and commercial operations. Consequently, the department made changes to the following elements of the Consultation RIS's proposed preferred option with a view to refine the proposal and better reflect the current state of the recreational wildlife market:

- increased the maximum animal limits under the standard and *specialised licence* to better reflect pet *keepers* and hobbyists, respectively;
- allowed the breeding of animals under the *specialised licence*;
- made *record*-keeping for all licence mandatory, unless hardship demonstrated;
- updated the lists of exempt, class 1 and class 2 species, and removed the list of prohibited species; and
- increased the term of the *advanced licence* to 5 years.

The revised policy proposal was developed in consultation with the department's Wildlife Advisory Committee, who support the revised licencing framework for *protected animals*. These revisions resulted in the final proposal presented in this Decision RIS, which is compared to the current framework and the preferred option in the Consultation RIS in Figure 1.

The final option was chosen as it provides the greatest net benefit, across licence holders, government, community and the environment. The updates from the option put forward in the Consultation RIS should improve the benefits to licence-holders, while maintaining the benefits to the department, the community and the conservation of wildlife.

The final option provides an equitable regulatory structure to all persons and businesses wanting to *keep* and trade *protected animals* in captivity. The introduction of the advanced licence also removes the regulatory burden of multiple categories under the commercial licence, as well as a substantial cost-saving for each licence purchased. The benefits for community members are equally substantial: the department estimates that up to 90% of current *recreational licence holders* will be paying a cheaper licencing fee. This number has increased due to the increased number of animals that may be held under the *standard* and *specialised licences*. The increased number of animals that commercial businesses may keep is expected to increase availability and reduce the retail price of some native animals. In short, the final option provides a suite of benefits for businesses, hobbyists and other community members.

The tiered licencing approach under the final position, in conjunction with the *online system* for record keeping, enables the government to better identify licence holders that are undertaking higher risk operations such as trading and/or large-scale breeding, and thereby focus compliance resources towards these high-risk licence holders. This will allow the department to regulate the market for trade and sale of high-value protected animals in a way that closes loopholes for illegal wildlife trade, while also allowing trade to continue. The risks associated with the new limits to the number of animals held under licence, such as an increase in *illegal trade*, are mitigated by improved tracking made possible by the mandatory online licencing system. The new fee structure for licences will ensure that the payment received for each licence will allow the department to recover the cost of administering the current framework (e.g. through assessment and compliance). In general, the new licencing framework for keeping protected animals is modern, effective and risk-based.

Implementation

The regulatory framework to support the management of *protected animals* in Queensland is proposed to commence by April 2020. Implementation of the new licencing framework (including online *record-keeping*) will happen progressively over 5 years, as licences expire, and are replaced with licences under the new framework. Other aspects of the new framework will commence immediately, such as restrictions on *take* of certain *protected animals*, and the various administrative amendments. The department has established an advisory committee to assist in communicating implementation. Communication will occur over several months prior to commencement of the new regulations in addition to advisory web material.

The legislation will be reviewed within 10 years of commencement, including measures that will be used to evaluate improvements and the effectiveness of the framework. Compliance auditing and enforcement activities will be increased over the first 3 years following implementation of the final position, in order to heighten awareness of the new requirements. This will be informed by monitoring higher risk licence holders, as well as auditing *traders* and breeders.

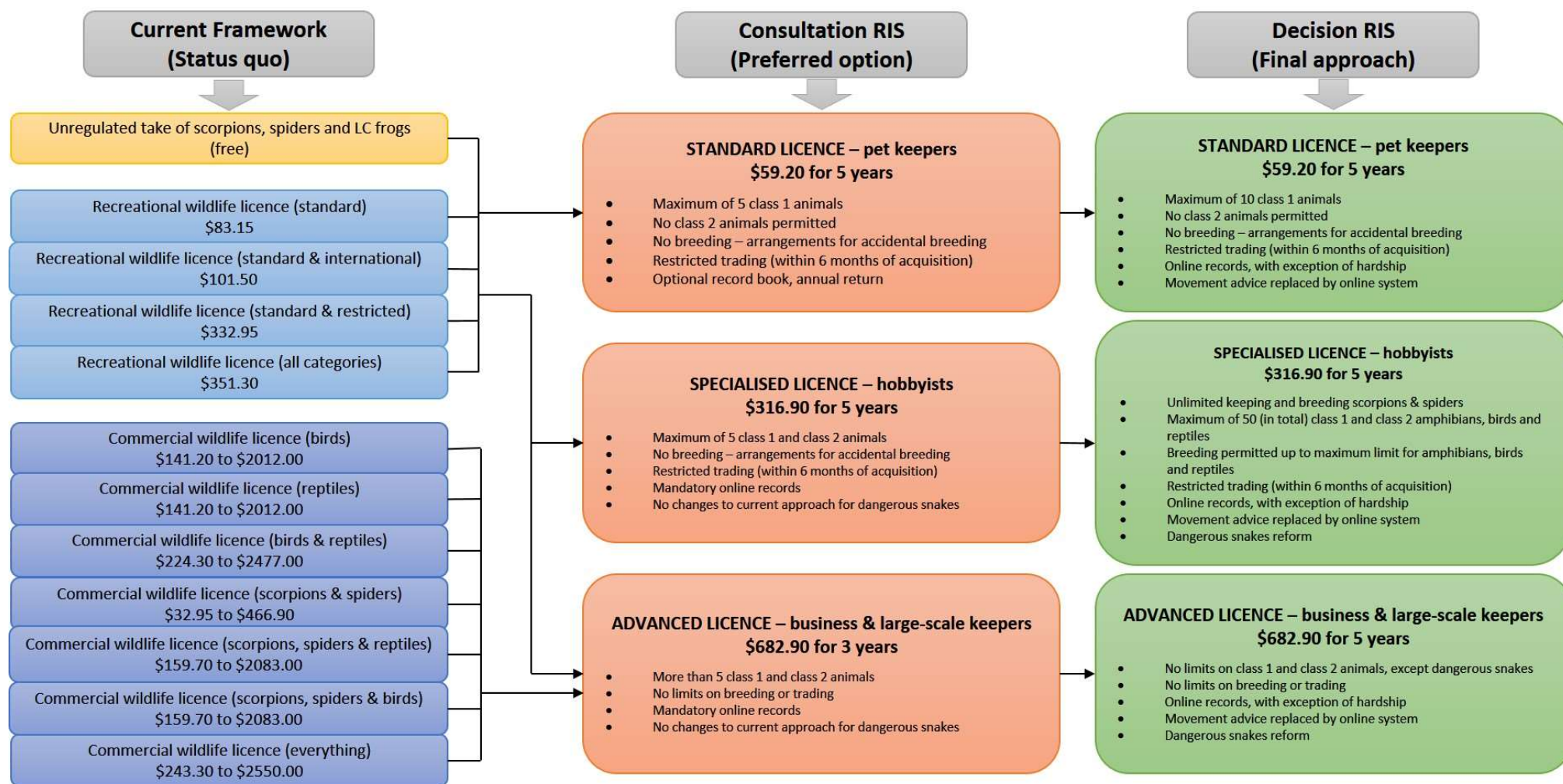


Figure 1: Final proposal presented in this Decision RIS compared to current framework and preferred option in Consultation RIS

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Introduction

This Decision *Regulatory Impact Statement* (Decision RIS) follows consultation that was undertaken in May and June 2018 on the 'Consultation *Regulatory Impact Statement*: Reviewing the framework for the management of protected wildlife (animals) in Queensland under the *Nature Conservation Act 1992*' (Consultation RIS).

This Decision RIS provides an overview of the consultation process and options consulted on, and a summary of the submission feedback received. In response to the feedback received in the Consultation RIS, the Department of Environment and Science (the department) revised the proposed preferred approach. This Decision RIS provides an explanation of this final revised proposal, and a cost benefit analysis of the potential impacts of this option on business and industry, the government, and the community.

First however, this Decision RIS provides some context of the current legislative framework, the issues the Consultation RIS was addressing, and the options presented in the Consultation RIS.

The current nature conservation framework

The conservation and management of *protected animals* in Queensland is regulated under the *Nature Conservation Act 1992* and subordinate legislation. The subordinate legislation includes the Nature Conservation (Wildlife Management) Regulation 2006, the Nature Conservation (Administration) Regulation 2017, and the Nature Conservation (Wildlife) Regulation 2006, collectively referred to as the *Nature Conservation Regulations*. These work in conjunction with conservation plans to establish an integrated and comprehensive State conservation strategy for protecting *native wildlife*.

Protected animals are animals that are native to Australia. This excludes exotic and domestic animals. People interact with *protected animals* in many ways, from *keeping* animals such as birds and reptiles as pets or for a hobby; to caring for those animals that are orphaned, sick or injured for release back into the wild; or just watching and enjoying animals in the wild. In other instances, there are community and industry expectations to deal with *protected animals* that may damage property or affect human health and safety. *Protected animals* are also used for *commercial purposes*. This includes the wildlife pet industry, crocodile and emu farms, the kangaroo skin and meat industry, the native export industry, and interaction-based tourism such as whale watching.

The *Nature Conservation Regulations* identify how people may interact with native animals in the wild and in captivity. The central regulatory mechanism for managing *protected animals* is the licencing framework. This framework seeks to ensure that impacts on *protected animals* are sustainable in terms of maintaining viable species populations in the wild, that risks to human safety are minimised, and that wildlife-based industries operate under an effective regulatory framework.

Rationale for review

Under the *Statutory Instruments Act 1992* most subordinate legislation automatically expires every 10 years and must be either remade or, where no longer required, allowed to expire. Consequently, the *Nature Conservation Regulations* were due to expire in September 2016. However, the Nature Conservation (Administration) Regulation 2006 was replaced in 2017 with the Nature Conservation (Administration) Regulation 2017. This replacement process did not include a comprehensive review of the effectiveness of the framework for regulating protected wildlife.

Consequently, the Queensland Government is currently undertaking the most comprehensive review of licences to *keep* protected native animals since 2004. This review is not addressing the licencing framework for protected plants, as this came into effect in 2014. In comparison, the licencing approach for *protected animals* has not been substantively reviewed since the Regulations came into effect in 2006.

Policy problems and objectives

This Decision RIS outlines the department's preferred approach to address several problems with the licencing framework for *protected animals*. A number of issues have been identified by the department, key industry groups

and government authorities since the introduction of the Nature Conservation Regulations in 2006, particularly in relation to wildlife management and trade.

Under the current licencing framework, licence holders have no limits to the number of animals they may *keep*, breed or *trade*. There is evidence that this has led to the establishment of a surrogate market sustained by large and sophisticated private collections, under licences intended for pet *keepers* and hobbyists. Unrestricted breeding and *trading* of animals, in conjunction with an unresponsive *record*-keeping system also allows licence holders to disguise the illegal *take* or purchase of animals. In particular, activities conducted under the *recreational wildlife licence* cover a broad spectrum of risks, increasing proportionally with the extent of *keeping*, *trading* and breeding. There are other issues in the licencing framework, such as the specific animals that may be kept, which are now out of date in comparison with other states. In general, the licencing framework does not align with the risks of the activities currently being undertaken, and was in need of review.

A related issue is that the current system of hardcopy licencing hampers compliance action around wildlife *trade*. Licence holders simply keep a physical *record* at the place where they are *keeping* the animals. As the department cannot monitor all of the more than 30,000 licence holders regularly, it is quite easy for persons involved in *illegal trade* to falsify *records*, and conceal illegal activity. This also makes compliance inefficient and slow.

Finally, the scientific community has raised concerns with the current unrestricted *take* of protected scorpions and spiders, and least concern amphibians from the wild. This has been identified as a threat to their conservation, potentially threatening the long-term viability of regional and localised populations.

There are also a number of other regulatory inefficiencies and unnecessary regulatory burden that have become apparent from stakeholder feedback.

In addressing these problems, the review has focussed on the following four objectives:

- modernising the system for *keeping* and *trading protected animals*;
- improving the ability to investigate illegal wildlife *trade*;
- strengthening conservation outcomes; and
- streamlining the regulatory framework and reducing administrative burden.

To address these issues the consultation RIS explored a number of options aimed at shifting to a modern, risk-based regulatory framework for *protected animals*, including the status quo. The final position presented in this Decision RIS aims to achieve the above objectives, while preventing any unreasonable regulatory burden, or other impacts on licence holders. This position has been developed in consultation with a range of relevant stakeholders through the department's Wildlife Advisory Committee.

Release of Consultation RIS

The Consultation RIS was prepared by the department to review the continued need, effectiveness, and efficiency of the *Nature Conservation Regulations*, and to assess the impacts of options to improve the management of *protected animals* in Queensland.

The consultation period on the Consultation RIS commenced on Thursday 24 May 2018 and closed at 5pm Monday 29 June 2018. Under 'The Queensland Government Guide to Better Regulation' the minimum recommended consultation period for a Consultation RIS is 28 calendar days. This consultation period was 36 calendar days, excluding Thursday 24 May as the Consultation RIS was not released until the afternoon on the 24th.

Extensions to consultation period

Upon request, private individuals were provided with a week extension on making a submission – until 5pm Friday July 6 2018, and organisations submitting on behalf of a number of people were provided with a two week extension – until 5pm Friday 13 July 2018. This provided a consultation period of 43 days and 50 days respectively. Overall twenty-one individuals and four organisations were provided with an extension.

Consultation notification

The department provided information about the regulation review on the Queensland Governmental portal and the get involved page, and notified the public of the Consultation RIS by email to ~30,000 licence holders, through social media, and through a formal media release. Information about the regulation review has been available since mid-2016, while communications around the Consultation RIS were sent in late May and late June 2018. A more detailed account of this process may be found in Attachment 1: Consultation process.

Options in Consultation RIS

No regulation

Under the Queensland Treasury guideline – ‘The Queensland Government Guide to Better Regulation’ – where a regulation is expiring, the option of not replacing the regulation must be considered. However, the expiry of the *Nature Conservation Regulations* without replacement would result in the inability to issue a range of licences, permits and other approvals for regulating interactions with *protected animals*, including those for *keeping* and *using protected animals* for recreational or *commercial purposes*. Consequently, this option was not investigated further under the Consultation RIS.

Options presented

The last comprehensive review of the management of *protected animals* in Queensland was undertaken in 2004. Since then there have been significant improvements in the understanding of *protected animals* and suitable management approaches. *Keeping protected animals* in captivity has also become an increasingly popular hobby, and the *illegal trade of protected animals* throughout Australia has increased.

Consequently, the department, community, and business and industry identified a number of problems with the *Nature Conservation Regulations* that could be resolved through a review of the Regulations. While there are benefits to the current *Nature Conservation Regulations*, remaking the existing regulatory framework in its current state does not provide an opportunity to address the identified deficiencies.

For each identified problem the Consultation RIS presented the option of retaining the status quo, and a number of amendment and reform options (4 options for issue 1, 3 options for issues 2 and 3). These issues and the explored options are outlined in table 1, and explained in further detail below.

Table 1. Options under the Consultation RIS

Option/Issue	Licencing framework	Record-keeping	Unregulated take
Option 1	Status quo; unrestricted recreational keep; highly restricted commercial trade	Status quo; hardcopy record-keeping	Status quo; unregulated recreational take of protected scorpions, spider and frogs
Option 2 (preferred option)	Maximum of five animals under standard or specialised licence; restrictions on breeding and trading under these licences; unrestricted breeding and trading under advanced licence	Voluntary online record-keeping for standard licence; mandatory online record-keeping for specialised and advanced licence	Restrictions on recreational take
Option 3	No new limits on number of animals kept under standard or specialised licences; restrictions on breeding and trading under these licences; unrestricted	Voluntary online record-keeping for all licences	Restrictions on recreational and commercial take

	breeding and trading under advanced licence		
Option 4	No limits on class 1 animals under standard and specialised licence, but maximum of five class 2 animals under a specialised licence; restrictions on breeding and trading under standard and specialised licences	N/A	N/A

Issue 1 – The licencing framework is not risk-based

Some of the key issues addressed by the Consultation RIS and the proposed regulatory changes is the emergence of an unregulated surrogate market for the *trade* of expensive native animals, and a regulatory framework which does not align with the risks of activities.¹

These issues are created by the current licencing framework for *protected animals*, which is based on two common licence types: the *commercial wildlife licence*, and the *recreational wildlife licence*. This current licencing framework does not reflect:

- the popularity of *recreational wildlife licences*; and
- that the practices of licence holders have evolved beyond that originally envisioned when the licencing framework was drafted.

For example, some of the more concerning practices occurring under *recreational wildlife licences* for which the framework was never developed to deal with include the establishment of large scale and sophisticated private collections, increased popularity for *keeping* certain species – particularly reptiles, and increased popularity of *trading* animals between *recreational wildlife licence* holders.

The outdated requirements with the current system have resulted in a framework that enables the proliferation of semi-legal or *illegal trade*. The primary cause of this is a lack of appropriate limits on the number of animals that may be held, bred or *traded* under a *recreational wildlife licence*. This has created a situation where higher-risk activities are permitted under a licence with low fees and requirements that do not address the level of risk. Meanwhile, commercial operators paying a larger fee are subject to a range of *record*-keeping requirements and are restricted from *keeping* or selling a number of species which are available to *recreational wildlife licence* holders.

Concurrently, the variety of species that can be kept under an authority has not been reviewed for over ten years and is outdated when compared to most other Australian jurisdictions. In particular, bird species that can be kept in Queensland are limited compared to the range of species that are commonly *traded* in most other jurisdictions.

Consequently, the licencing framework:

- has created an opportunity for the establishment of an unregulated surrogate market for *protected animals*;
- does not reflect the risk of the activities under each licence; and
- resulted in disproportionate regulation of species relative to other jurisdictions.

The department has a *Regulatory Strategy* that requires the department to focus on monitoring performance, and responding to performance using a risk-based approach. To address these issues the department explored a range of options to achieve a more risk-based licencing framework.

Proposed options in the Consultation RIS

Four options were investigated in the Consultation RIS.

Option 1 presented the status quo, continuing the approach for recreational and commercial licences. Under this approach a person could be *keeping* and *trading* hundreds of animals, but pay just \$83.15 for a standard recreational licence - the same fee as a person *keeping* just one or two animals. This licence is also just 3.3% of the equivalent \$2,550.00 commercial licence, which also allows fewer species to be kept and *traded* than a recreational licence.

Options 2 to 4 presented an alternative licencing framework where the suite of *recreational* and *commercial wildlife licences* are replaced by a *standard licence*, a *specialised licence*, and an *advanced licence*. Under these options a *standard licence* would only allow *keeping* of basic, non-dangerous animals readily available in the market (class 1 animals) whilst a *specialised licence* and *advanced licence* would allow class 1 animals as well as more dangerous, difficult to *keep*, or *restricted animals* (class 2). Under these three options, breeding of animals would not have been permitted under a standard or *specialised licence*.

These three options varied in relation to the limiting the numbers of animals permitted under the licences, as follows:

- Option 2 (recommended option): a *standard licence* would restrict the licence holder to *keeping* a maximum of five class 1 animals. A *specialised licence* would allow a maximum of five animals – comprised of any combination of class 1 and class 2 animals. The only limits on the number of animals permitted under an *advanced licence* would have been those that currently exist (e.g. maximum number of animals, limits on dangerous snakes).
- Option 3: the only limits on the numbers of animals permitted would have been those that currently exist (e.g. maximum number of animals, limits on dangerous snakes)
- Option 4: the only limits on the numbers of class 1 animals permitted, or for the number of animals permitted under an *advanced licence* would have been those that currently exist (e.g. maximum number of animals, limits on dangerous snakes). However, a *specialised licence* would have had a maximum limit of five class 2 animals.

The proposed licencing approach, in conjunction with the proposed classes of animals is depicted in Figure 2. The 'compliance risk' in this figure refers to the risk-based approach required by the *Regulatory Strategy*, and is linked both to the likelihood of *trading* animals and the risk to the public posed by the species that are kept.

Option 2 was proposed, as it was seen to provide the strongest framework for managing the risk of illegal trade, and for pro-actively monitoring compliance. This would allow the department to best achieve the objectives of the review. Option 1 was not chosen as it allowed the continuation of the unregulated market for trade of valuable protected animals, and maintained some significant loopholes for illegal wildlife trade. Options 3 and 4 were not chosen as they would have enabled high numbers of animals to be kept, potentially allowing the continuation of the surrogate market and reducing the ability for the department to conduct effective compliance.

ANIMAL TYPE ACTIVITY TYPE	EXEMPT ANIMALS	CLASS 1 ANIMALS	CLASS 2 ANIMALS
	<ul style="list-style-type: none"> commercially abundant commonly kept as pets simple to keep no conservation risk very low poaching threat 	<ul style="list-style-type: none"> market availability not commonly kept simple to keep low conservation risk low poaching threat 	<ul style="list-style-type: none"> low market availability conservation risk requires specialised keeping skills risk to public safety susceptible to poaching
Primary intent to keep for personal enjoyment	No licence required (very low compliance risk)	Standard licence (low compliance risk)	Specialised licence (moderate compliance risk)
Primary intent to trade and breed	No licence required (very low compliance risk)	Advanced licence (high compliance risk)	Advanced licence (very high compliance risk)

Figure 2: Proposed risk-based approach for keeping protected wildlife

Issue 2 – Record-keeping requirements facilitate illegal trade

The current *hardcopy* system for *record-keeping* and *movement advices*, under *commercial wildlife licences* and *recreational wildlife licences*, creates loopholes for the *illegal trade* of *protected animals*.

The current *hardcopy* system for *trading protected animals* is also outdated for the level of *trade* which occurs in Queensland. This *hardcopy* system also allows licence holders to easily conceal illegal activities. Ensuring the department has access to essential *records* kept by licence holders, in as close to real time as possible, will improve the ability to detect attempts to illegally obtain and *trade protected animals*.

Record books

The *record book* must document species type and transaction details of where the animal is bought, received, sold, or given away. These *records* are not submitted to the department. The department generally needs to visit the licenced premises (for example, a person's home or business) to view the *records*. However, *commercial wildlife licence* holders must submit a *return of operations* to the department annually, which provides a summary of the *records* kept in their *record book*. *Recreational wildlife licence* holders are not required to provide this summary.

The current *hardcopy* system allows licence holders to easily conceal *illegal trade* and *take* through the *record-keeping* required for a licence. The lack of the timely submission of *records* to the department creates opportunities for licence holders to falsify and manipulate *records*. It also undermines the ability for the department to know what animals are kept under a licence and to proactively detect irregularities in *record-keeping*.

Movement advices

When moving or *trading protected animals*, there is a requirement for the department to be notified, or to first approve the *movement* or *trade*. *Protected animal trade* is most commonly notified through the form of a *movement advice*. It is estimated that over 16,000 *movement advices* are received annually across Queensland. A *movement advice* allows certain animals to be moved without prior approval.

Recently the department released an online version of *movement advices* through the department's permit and licencing system, 'Connect'. However, for hard copy versions, the *movement advice* is comprised of four parts, one for the person selling/giving away the animal, one for the person receiving the animal, and a copy of each of these for the department.

The current four-part hardcopy *movement advice* system for *trading* animals is out-dated for the level of *trade* which occurs in Queensland, and between Queensland and other jurisdictions. The *hardcopy* system and the high

number of *movement advices* received creates costs and administrative burden for both licence holders and government, and makes it difficult for the department to achieve proactive compliance.

Proposed options in the Consultation RIS

Three options were presented in the Consultation RIS.

Option 1 presented the status quo, where *movement advices* are provided to the department in two-part hard copy forms and *record books* are kept solely in hardcopy at the premises of licence holders.

Options 2 and 3 aimed to strengthen conservation outcomes and improve the framework for *keeping protected animals* by improving *record-keeping* and *movement advice* requirements, particularly for licence holders who will be *keeping* specialised animals that are also highly desirable from a *trading* perspective, and those who undertake a lot of *trade*.

Under Option 2, *specialised licence* and *advanced licence* holders would be required to *keep* an electronic *record book* through the department's new *online system*, and to use the electronic system for *movement advices*. However, if this would cause unnecessary hardship (e.g. licence holder is not computer literate, does not have an electronic device or computer, or an internet connection), the licence holder would be provided with the opportunity to seek the department's permission to continue use of a hardcopy *record book*. *Standard licence* holders would have been provided with the opportunity to use an electronic book or to retain their hardcopy *record book*.

Under Option 3, use of the electronic system would have been optional for all licence holders. If the electronic *record book* in the system were used, as with Option 2, when *records* are entered into the electronic *record book*, these *records* would be automatically submitted to the department.

Option 2 was presented as the recommended option, as it works most effectively with the risk-based licencing system, and allows for targeted, risk-based compliance monitoring, while also providing licence holders the convenience of online record-keeping. Options 1 and 3 were not chosen, as they would have maintained the negative aspects of the hard copy record-keeping system, allowing avenues for illegal wildlife trade.

Issue 3 – Unregulated take of animals from the wild

The scientific community has raised concerns with the current unrestricted *take* of protected scorpions and spiders, and least concern amphibians from the wild. This has been identified as a threat to their conservation, potentially threatening the long-term viability of regional and localised populations.

Under the current framework, a person does not need a wildlife authority (e.g. a *recreational wildlife licence*) to *take* from the wild:

- an unlimited number of protected scorpions and spiders (all of which are currently are classed as least concern); and
- up to eight least concern amphibians.

The *take* of all other *protected animals* from the wild, as well as *keeping* and *using* them, requires a wildlife authority. Consequently, the exemption for these species is not consistent with the management approach for all other species.

The current approach allowing the unregulated *take* of protected scorpions and spiders and least concern frogs from the wild also limits the ability for the department to monitor the rate of species taken from the wild, to ensure the animals are being appropriately dealt with, and to minimise the risk of *illegal trade*. For example, due to the current *record-keeping* framework, people can disguise animals taken from the wild as births from captive-bred animals and then sell them under a *recreational wildlife licence*.

The current approach has also led to various conservation concerns for particular species.

For amphibians, unregulated *take*, *keep* and *use* may increase the risk of spreading diseases such as chytrid fungus into natural and captive frog populations. In addition, there is no assurance that persons collecting frogs are correctly identifying least concern species, and it is possible that people are collecting *threatened* or *near threatened* species.

Scorpions and tarantulas often have isolated populations with low levels of reproduction. This means that *taking*

just one or two animals, particularly mature females, may endanger the viability of the local population. Additionally, given the lack of taxonomic knowledge of these species, the rate of *take* of these species may have already contributed to the decline and the possible extinction of undescribed species.

Proposed options in the Consultation RIS

Three options were presented in the Consultation RIS.

Option 1 presented the status quo, which allows people to recreationally *take* and *keep* protected scorpions and spiders, and least concern amphibians, from the wild without need for a permit. Protected scorpions are those of the *Urodacus* genus and protected spiders are those of the family Theraphosidae (i.e. tarantulas). However, *take* from the wild for commercial harvesting, educational purposes or scientific purposes would have continued to require a permit or authority.

Option 2 proposed that protected scorpions and spiders could only be taken from the wild under a wildlife harvesting licence, collection authority, educational permit, or scientific purposes permit; and amphibians could only be taken from the wild under a collection authority, educational permit, or scientific purposes permit. The *keep* of these animals for *recreational purposes* or *commercial purposes* would have required a licence, and recreational *keepers* would have been required to purchase an animal from a licenced seller.

Option 3 provided a similar regulatory framework to Option 2. However, this option also restricted the commercial harvest of protected scorpions and spiders from the wild to a greater degree than both Option 1 and Option 2. Under Option 3, a commercial harvest authority would only have been permitted if harvest were determined to be sustainable, for example through population surveys.

Option 2 was presented as the recommended option, as it provided the greatest benefits to the community and environment. The option allows government to monitor species taken from the wild and to minimise the risk of illegal trade. Option 1 was not chosen as it would have maintained the current (possibly unsustainable) take of protected scorpions and spiders, and enables illegal trade. Option 3 was not provided as the restrictions on commercial trade may have had unexpected influences on the legal market for these species, and possibly provide monetary incentives for illegal trade.

Overall recommended approach

In the Consultation RIS, the cumulative effect of the recommended options was:

- that *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. This is summarised in Figure 3.

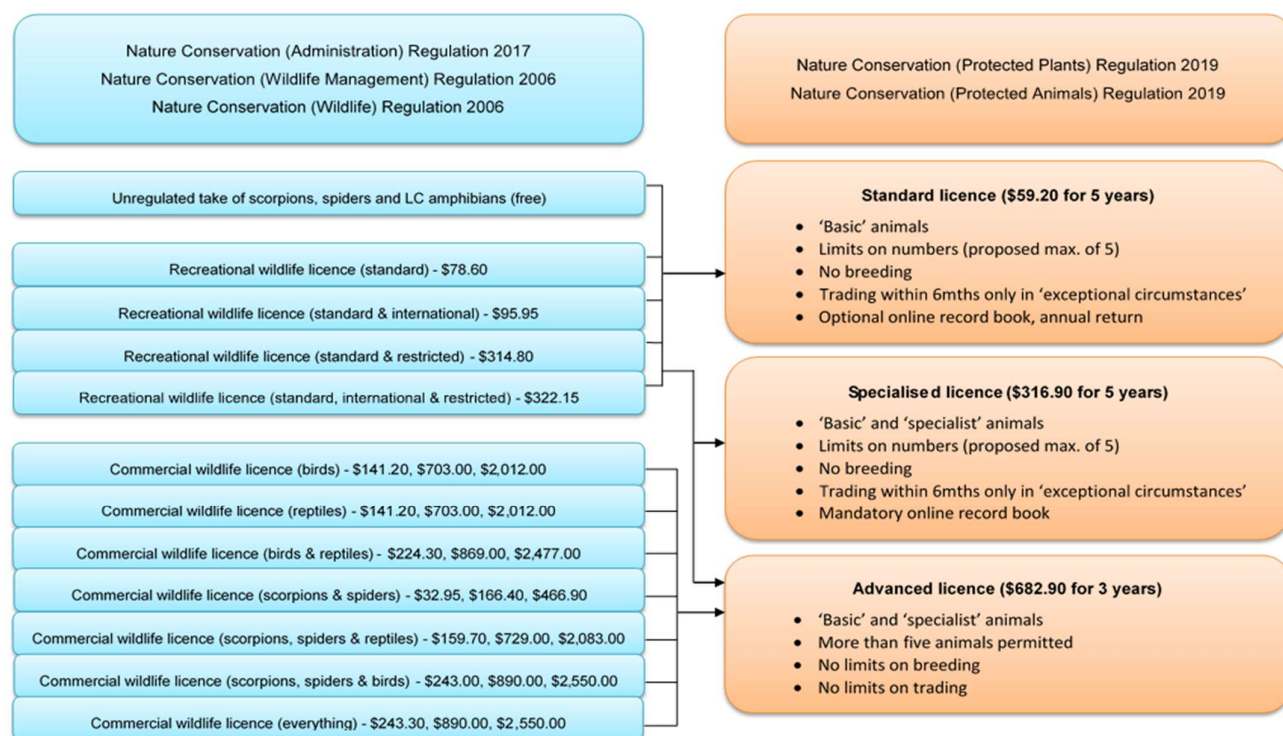


Figure 3: Preferred option, as presented in the Consultation RIS (fees based on 2017/18 financial year)

Administrative Amendments

The Consultation RIS also provided an opportunity for the general public, licence holders and industry to provide feedback on opportunities to clarify, streamline and simplify some regulatory requirements. The streamlining approach would also include reducing regulatory burden for licence holders considered to have a low conservation risk to animals in the wild. For example, the Consultation RIS proposed:

- replacing the requirement for airports to obtain a damage mitigation permit with a self-assessable code;
- removing the need for a permit when collecting, for a private collection, discarded animal parts; and
- allowing the mutation, but not hybridisation, of reptiles.

Consultation on the proposed options

The department conducted a broad consultation with the general public, through an invitation for comments on the Consultation RIS, a targeted survey for licence-holders, and direct consultation with a number of stakeholders.

Following emails, and the public consultation process, the department received 96 electronic submissions, and 869 responses to its online survey. As the surveys were submitted anonymously the department cannot determine if people submitting a survey response also submitted an email or hardcopy submission.

During and following the consultation period, the department held meetings with the Wildlife Advisory Committee: a group representing recreational *keepers*, commercial *keepers*, animal welfare and conservation interests and scientific interests, including the Queensland Museum, the Pet Industry Association of Australia, QLD Fauna Lobbyists, QLD Council of Bird Societies and RSPCA. In addition to detailed discussions with the Wildlife Advisory Committee, detailed workshops were held with several societies and a lobby group, to refine the final proposed policy position. Further details around the consultation process may be found in Attachment 1.

Feedback from letters of submission

This section summarised the themes raised in the letters of submission received by the department, and the department's response to each issue. The 96 submissions contained a range of detailed and high-level feedback

around the requirements of the licencing framework, the maximum animal limits under the various licences, and the species lists. There were also a number of other concerns around fees, processes and other miscellaneous changes. The department addressed these concerns by updating the final proposed policy position. These updates were developed in consultation with the Wildlife Advisory Committee, and through detailed workshops with the Queensland Council of Bird Societies, the Queensland Finch Society and the Queensland Fauna Lobbyists. The department also held extensive workshops with NSW, to better align species lists to improve cross-border *trade*. A detailed account of submission feedback is found in Attachment 2.

Licencing framework and fees

A majority of submissions addressed the proposed licencing framework, and the maximum animal limits. Of these submissions, most disagreed with the proposed licencing requirements, based on potential negative impacts of *trading* and breeding restrictions on mid-range hobbyists, and from the proposed animal limits requiring people to move to a more expensive licence. An associated concern raised by around half of submissions was the fees for the proposed new licence types, of which the majority thought that the fees were too high.

Departmental response

The department has addressed these concerns by allowing breeding of animals and *trading* offspring under the *specialised licence*, with the restriction from *trading* within 6 months only applying to acquired animals. The maximum animal limit has been increased from 5 to 50 vertebrate animals (birds, reptiles and amphibians) and unlimited scorpions and spiders, based on survey responses and consultation. This is expected to address the concerns of a number of licence holders who would otherwise have to transition to a more expensive licence or change their activities.

Species lists

Almost half of the submissions raised concerns around the proposed species lists. These submissions included requests to reconsider species on the prohibited list, to realign the proposed classes with the New South Wales *keeping* list. A number of other miscellaneous concerns were raised, such as stating that commercial licence holders would not be able to meet animal welfare standards, or requesting native mammals to be kept as pets. A small number of respondents addressed the proposed regulation of the *take* of amphibians, and protected scorpions and spiders, of which most supported the approach given in the Consultation RIS.

Departmental response

The department has addressed these concerns by removing the list of prohibited animals, and readjusting the lists of class 1, class 2 and exempt species, based on submissions and stakeholder engagement. The proposed lists are expected to align more closely with the risk of *keeping* certain species, with NSW legislation, and with *keeping* habits among hobbyists. Animal welfare standards apply to all licence holders including commercial operators.

Online record-keeping

Around half of respondents supported the transition to an online *record*-keeping system, with around a quarter expressing dissatisfaction with the current *record*-keeping framework (23%). Around a quarter of respondents did not support an online *record*-keeping system. In general, this was for the sake of licence holders who do not have ready access to a computer or the internet, and others who feel they don't have the technological skills and knowledge to navigate an *online system*.

Departmental response

The department addressed these concerns by transitioning to an *online system* for *record*-keeping, but allowing licence holders the option to apply for permission to continue to keep hard-copy *records*, if the shift to an *online system* would cause them unnecessary hardship.

Unregulated take of animals from the wild

A small number of respondents raised concerns about the unregulated take of amphibians and protected scorpions and spiders. The majority (80%) of these submissions supported the department's proposal to only allow the take of these species under an authority.

Departmental response

The department acknowledged these concerns by maintaining the position that taking of these species will only be allowed under an authority.

Airports

There were a small number of respondents who raised concerns around the removal of Damage Mitigation Permits for airport authorities. The primary concern was airport authorities using lethal mitigation methods as the first option under the proposed approach rather than the last option under the current framework.

Departmental response

The department has noted the animal welfare concerns, and the new provisions around airports contain a requirement that the owner has made a reasonable attempt to prevent or minimise the damage or threat caused by the animals.

Miscellaneous comments

There were a broad range of other concerns raised, including:

- the length of the consultation period and the methods used;
- the value of *keeping native wildlife* for combating anxiety, for the development of skills, and to contribute to research;
- requests for more rangers, and more departmental presence at club meetings and events; and
- other particular concerns around the *online systems*, *record-keeping* and *licence-requirements*.

Departmental response

The department has noted all of this feedback, and has incorporated this into its decision-making and consultation report.

There were also a number of out of scope activities brought up in submissions. These included issues that will be addressed in a separate review process: rehabilitation permits and licencing of spot and catch activities. The remaining submissions included organisational profiles, information about consultation processes conducted by New South Wales Government, and information about land clearing rates in New South Wales and Queensland.

Feedback from survey responses

This section summarises the feedback received through the consultation survey. The survey contained a set of multiple choice questions designed to identify the public's responses to the assumptions and proposals in the Consultation RIS, and to assist the department to better understand the current wildlife *keeping* market, and how the consultation proposals may affect individuals. The responses to the various survey questions have been summarised here, while a detailed overview of the survey questions and responses may be found in Attachments 3 and 4.

Animal limits

Overview of survey responses

Several questions focussed on the proposed limits to the numbers of animals allowed under the licence. The majority of respondents to the survey (67%) did not agree with the proposed set of limits to the licencing framework. Over half of these did not support any limits on the numbers of species held, with many of the others simply disagreeing with the limits proposed. Respondents provided a number of comments, such as a belief that the only limits on numbers of animals held under a licence should be based on the skills and discretion of the licence holder. The remainder of respondents were simply opposed to the limits proposed in the consultation RIS.

When asked about the specific level of limits under the *standard* and *specialised licences*, the majority (81%) of respondents thought that the proposed limit of five animals under both the *standard licence* and the specialised licence was not reasonable. A number of respondents proposed, through comments, that limits of from 10 to 50

would be more reasonable, or stated that a limit of five animals for one of the licences would be appropriate, but not both.

Departmental response

Based on these responses, the department decided to update the proposed licence framework, substantially increasing the limits to the number of animals which may be kept. These changes were developed through consultation and workshops with the Wildlife Advisory Committee, and through dedicated workshops with several organisations.

The department did decide to impose limits on the number of animals kept, despite a majority of survey respondents disagreeing with the proposal. One of the objectives of this review was to enact a risk-based system for the management of *protected animals* in Queensland. Under the current system, with no limits on the number of species kept, there appears to be a flourishing market for *trade* of animals, by holders with the ability to *keep* and *trade* unlimited animals. This creates serious animal welfare concerns, and provides a clear avenue for illegal wildlife *trade*.

By proposing limits on the number of animals and the kinds of animals that may be kept and *traded* under the various licences, the licencing system can minimise risk, and scale the costs of the various licences to the associated risk, and the resultant compliance effort required. This will reduce the risk of illegal wildlife *trade* and animal welfare concerns, by allowing the department to focus compliance efforts on the licence holders who pose the greatest risk.

In order to reduce the resultant burden on licence holders, the number of animals which may be kept has been increased to 10 under a *standard licence* and 50 vertebrates (birds, reptiles and amphibians) and unlimited scorpions and spiders under a *specialised licence*. This should prevent any increased cost of regulatory burden on the majority of licence holders. Individuals and businesses that desire to *keep* more than 50 animals may still apply for an *advanced licence*.

Activities

Overview of survey responses

A number of questions focussed on the proposal to have a licencing approach that focuses on breeding and *trade*. Just under half of respondents (45%) thought that it was reasonable to have a licencing approach that focuses on whether a person is breeding their animals, although around 20% of these people thought that the limits under *standard* and *specialised licences* should be updated. The remaining respondents, a little over half of the total (55%), thought that it was not reasonable to adopt a licencing approach focused on breeding animals. A number of these people (29%) identified that the proposed licencing approach has a direct imposition on their right to breed animals, as a current licence holder. A number of other respondents stated that the limits would either prevent them from breeding their collections, or would force them to switch to a different licence.

Just over half (55%) of respondents agreed with the proposal to adopt a licencing approach that focussed on whether a person is *trading* their animals, with a similar number disagreeing (45%). Of those who did not agree with the proposal, a small percentage requested that the option would be readjusted to allow hobby level *trade* under the *standard* and *specialised licences*.

Departmental response

In response to these concerns, the department has proposed to continue allowing limited *trading* under the *standard* and *specialised licences*, and breeding and *trading* of offspring (once independent of parent) under the *specialised licence*. These changes were developed through the same consultations and workshops as the other updates to the licencing framework outlined in this Decision RIS.

While responding to stakeholder feedback, the department has not allowed unrestricted *trade* under the various licences. This would not meet the objectives of the regulatory review, specifically around restricting the *illegal trade* of wildlife, through loopholes in the regulatory system. To remove the potential for allowing such *trade* under *standard* and *specialised licences*, there will be a restriction on *trading* within 6 months of acquisition of an animal.

Species lists

Overview of survey responses

A general majority (65%) of respondents believed that *recreational wildlife licence* holders should continue to be allowed to *keep* more species than *commercial wildlife licence* holders, with around a third of these invoking animal welfare concerns as a reason to restrict particular animals to *recreational wildlife licence* holders. Of the respondents who did not want *recreational wildlife licence* holders to *keep* more species, all suggested that commercial licence holders should have access to the same species currently kept recreationally.

When asked directly about the categorisation of species in the RIS, approximately half of respondents agreed with the proposed lists of class 1 and class 2 species. The other half of respondents disagreed, with a number of minor changes proposed, such as allowing the *keeping* of native mammals, moving venomous snakes to a separate class, and realignments of the species within the various classes (e.g. to align with the lists in NSW).

Additionally, the majority of respondents (70%) agreed that the *take* of scorpions, spiders and amphibians from the wild for a *recreational purpose* should not be allowed to continue.

Government response

Based on these responses, the department has moved a number of species from one category to another – either exempt, class 1 or class 2 and removed the prohibited list. These realignments were made in consultation with the Wildlife Advisory Committee, and with organisations whose members *keep* and handle the species on the list directly. The new categorisations ensure proportional regulation of species, and to ensure that species currently being lawfully kept are not prohibited under the proposed framework.

Licence holder information

The survey include a range of general questions around the proposed licence framework, and impacts it would have on current licence holders.

Submissions

These questions related to the number and type of animals kept by individual licence holders, the number of holders breeding or *trading* animals (and how often), and the impacts to licence holders from the proposed licence framework. Around 80% of respondents stated that they would be forced onto a more expensive licence option under the proposed framework. The most common reason for respondents requiring a more expensive licence was due to the number of animals they were *keeping* (82%), followed by the species being kept (64%), the fact that they were breeding animals (67%), or the fact that they were *trading* animals (51%).

Government responses

This information has allowed the department, in conjunction with consultation and written submissions, to update the licencing framework. In particular, the *specialised licence* will now allow for the *keeping* of up to 50 vertebrate animals, and permit breeding and *trading*, subject to certain limitations.

Concurrent reviews

At the same time that the department was consulting on the Consultation RIS, the New South Wales Government was also consulting on proposed changes to their wildlife licencing framework.

Included in this process was a proposal to introduce a 'code' category, to allow a person to *keep* certain reptile and amphibian species without requiring a licence. This approach was not contemplated under the department's Consultation RIS, but is something that stakeholders suggested to the department during consultation meetings as an option that the department should consider.

The New South Wales consultation documentation also provided information on the *keeping* practices of licensees in New South Wales. This information included identifying that, of those licence holders who provided *record book* data for 2017, over 85% of licence holders kept less than five animals and almost 95% kept less than ten animals. This is broken down as follows:

- 51.3% of people *keep* no animals or just one animal;
- 35.5% of people *keep* two to four animals;
- 7.7% of people *keep* five to nine animals; and
- 5.5% of people *keep* 10 or more animals.

(Source: State of NSW and Office of Environment and Heritage (2018), *Discussion paper: Towards a risk-based approach to wildlife licences*, Office of Environment and Heritage: Sydney)

Importantly, the data received from New South Wales reflects the approximations used in the Consultation RIS to determine the impacts on Queensland's recreational wildlife *keepers*. That is, 85% of licence holders *keep* five animals or less, 5% *keep* between 5 and 10 animals, and 10% *keep* more than 10 animals.

Learnings

Although the most responses in favour of an option were for the status quo, this does not align with the intent of the review. It will also continue the inequity in licences – where a person who *keeps* just one animal will be paying the same licencing fee as a person who *keeps* hundreds of animals. It will also continue a system that allows for an unregulated surrogate market for wildlife, which creates loopholes allowing for illegal trade.

The preference for the status quo is likely because of a selection bias among the people who responded to the survey or provided submissions. Put simply, the results of the survey suggest that those people who keep larger numbers of animals were more likely to respond, as well as more likely to be more impacted by the proposed changes. Out of the 568 respondents who identified the numbers of animals they *keep*, 68.5% identified that they *keep* over five. This is much higher compared with the numbers of animals kept on average in New South Wales (in the concurrent reviews section above), or with the numbers found in the department's audit of licence holders for the Consultation RIS. This suggests that the survey results reflect the views of people who would be more likely to transition to a more expensive licence under the consultation proposal. However, the survey respondents represent a small sample size of recreational wildlife holders. The overall survey engagement of 869 responses represents less than 2.9% of the size of the *recreational wildlife licence* market, whilst the 581 people who identified they hold recreational licenses represent less than 1.9% of licence holders.

The main concerns raised by submitters in relation to the proposed preferred option (Option 2) – particularly the species lists, the animal limits under the *standard* and *specialised licence*, and breeding limitations for the *specialised licence*, have been addressed in the proposed final option presented in this Decision RIS. This is expected to reduce the potential impost on licensees, and may address submitter's reasons for preferring to retain the status quo.

The overwhelmingly consistent feedback on the proposed options highlighted the need to review the regulations. Under the current framework, there are limited requirements for people to provide the department with detailed information on the number and species of animals they *keep* and *trade*. This compromises the department's ability to administer the framework in an informed manner, and opens avenues for unlawful activity.

The consultation feedback has provided the department with significant data that allowed the development of a revised proposal that better meets the needs of pet *keepers*, hobbyists, and larger-scale and commercial operations. In particular, the feedback emphasised the need to revise the proposed:

- categorisation of exempt, class 1, class 2 and prohibited animals;
- approach to the regulation of dangerous snakes, common reptiles and amphibians, and mammals; and
- approach for the *standard*, *specialised*, and *advanced licences*.

The revision of these has resulted in the final preferred policy position, outlined below.

Costs and benefits of options not taken forward

The various options in the Consultation RIS were explored in terms of benefits and costs for business, government, the community and the environment. A detailed analysis of these costs and benefits may be found in the Consultation RIS, while a summary may be found below. Table 2 provides a brief overview of each of the options

proposed, for reference.

Table 2. Options under the Consultation RIS

Option/Issue	Licencing framework	Record-keeping	Unregulated take
Option 1	Status quo; unrestricted recreational keep; highly restricted commercial trade	Status quo; hardcopy record-keeping	Status quo; unregulated recreational take of protected scorpions, spider and frogs
Option 2 (preferred option)	Maximum of five animals under standard or specialised licence; restrictions on breeding and trading under these licences; unrestricted breeding and trading under advanced licence	Voluntary online record-keeping for standard licence; mandatory online record-keeping for specialised and advanced licence	Restrictions on recreational take
Option 3	No new limits on number of animals kept under standard or specialised licences; restrictions on breeding and trading under these licences; unrestricted breeding and trading under advanced licence	Voluntary online record-keeping for all licences	Restrictions on recreational and commercial take
Option 4	No limits on class 1 animals under standard and specialised licence, but maximum of five class 2 animals under a specialised licence; restrictions on breeding and trading under standard and specialised licences	N/A	N/A

Risk-based licence framework

The Consultation RIS explored four different options to establish a more risk-based regulatory framework for keeping *protected animals*. These options included:

- maintaining the status quo, which involves maintaining the current licence types and high number of animals that can be kept under licence (option 1); or
- moving to a system with three licences: *standard licences*, *specialised licences* and *advanced licences*, with varying limits on the number of animals that can be kept under licence (options 2 to 4).

The final position presented in this Decision RIS is a revised version of option 2.

Option 1 was not chosen as it would also allow the continuation of an unregulated surrogate market that facilitates illegal *trading* of wildlife by *recreational wildlife licence* holders. The key benefit of option 1 would have been the continuation of a familiar regulatory environment for all stakeholders. This would have allowed industry, licence holders and government to continue to operate as they are, negating the need to invest time, energy and resources into new systems and processes. Despite this, the option would not have addressed the objectives of the review, maintaining the current set of issues.

Options 3 and 4 offered alternative versions of the preferred licencing framework (option 2). The key benefit of options 3 and 4 was, similar to option 2, the delivery of a modernised framework that provides licence types to

better suit the needs of the wildlife *keeping* industry.

However, options 3 and 4 were not chosen because they still enable potentially high numbers of animals to be kept under certain licence types. This would potentially allow the continuation of an unregulated surrogate market for valuable animals accessible by recreational *keepers*. It would also continue to be difficult for the department to identify if an animal had been lawfully acquired, or unlawfully taken from the wild or bred. As a result, options 3 and 4 would likely have required increased compliance and enforcement effort, and may have provided continued avenues for *illegal trade*.

Record-keeping and illegal trade

The Consultation RIS explored three different options for *record*-keeping and monitoring the *illegal trade* of *protected animals*. These options included:

- maintaining the status quo, which involves hardcopy *record*-keeping only (option 1);
- shifting to a mandatory online *record*-keeping system, for *specialised* and *advanced licence* holders, and voluntary online *record*-keeping for *standard licence* holders (option 2); or
- shifting to a voluntary online *record*-keeping system for all licence holders (option 3).

The preferred option presented in this Decision RIS is a revised version of option 2. The costs and benefits of options 1 and 3 are explored below.

These two options were not chosen because they would also maintain the negative aspects of the current hard copy *record*-keeping system. This system doesn't allow for the timely provision of animal *keeping*, *trading* and *movement records* for the department. It would also continue to provide opportunities to falsify and manipulate these *records* to conceal *illegal trade*. These negative aspects undermine the department's ability to:

- know what animals are kept under a licence;
- proactively detect irregularities in *record*-keeping; and
- target resources for compliance activities towards licence holders undertaking *high risk trade*.

The key benefit of these options would have been the continuation of familiar hard copy *record*-keeping environment for recreational and commercial licence holders. These options would prevent licence holders and government from having to invest in new *record*-keeping processes and systems. Despite these benefits, the both options would fail to achieve the objectives of monitoring the *trade* and *movement* of animals, and the conservation costs of these options were seen to outweigh the minor benefits to licence holders.

Unregulated take of animals from the wild

The Consultation RIS explored three options to address issues with the *take* of protected scorpions and spiders and least concern amphibians from the wild under the currently regulatory framework. These options include:

- the status quo, which involves unrestricted *take* of protected scorpions and spiders and least concern amphibians from the wild for *recreational purposes* (option 1);
- removing the ability to *take* protected scorpions and spiders and least concern amphibians from the wild for *recreational purposes* without authorisation (option 2); and
- applying option 2 with additional monitoring to ensure ecological sustainability (option 3).

The preferred option presented in this Decision RIS is option 2. The costs and benefits of options 1 and 3 are explored below.

Option 1 was not chosen as maintaining the status quo would continue to limit the department's ability to:

- monitor the rate of species taken from the wild;
- identify whether animals being kept were acquired lawfully or through *illegal trade*;
- ensure taken animals are being appropriately dealt with when taken from the wild; and
- ensure the unregulated *take* of animals is sustainable.

The key benefit of option 1 would have been the continuation of familiar arrangements for individuals *taking* protected spiders and scorpions and least concern amphibians for *recreational purposes*, and avoid any costs or

disruptions to businesses. This was not seen to outweigh the conservation benefits provided by the final position.

Option 3 was not chosen as it would have required significant government investment to implement monitoring programs to support the identification of annual sustainable quotas for commercial harvesting. These changes could have also had broader impacts on the retail sector, by reducing the availability of particular species of animal. The key benefit of option 3 would have been a highly effective approach to ensuring the *take* of all protected scorpions and spiders and least concern amphibians was ecologically sustainable. The monetary costs of implementation and the disruption to the market were seen to outweigh these benefits, however.

Final preferred policy position

Categorisation of animals

In response to public consultation and discussions with New South Wales, a number of changes have been proposed to the lists of exempt, class 1, class 2, and prohibited animals. The final proposed lists are provided in Attachment 5, and are summarised below. Figures 4-6 outline the changes between the lists provided in the Consultation RIS and the final position.

The core objective of this refinement was to ensure proportional regulation of species, and to ensure that no species currently kept lawfully under the existing licencing framework would be prohibited. This refinement process used the species assessment form provided in Attachment 5. The criteria in this form are generally consistent with the criteria that New South Wales used in their licencing review. This process has resulted in removal of the prohibited list for reptiles and amphibians. It has instead been replaced with a comprehensive list of reptiles and amphibians that are permitted – similar to the approach undertaken by most jurisdictions, including New South Wales.

In addition, once the new regulations are implemented, the department will establish an ongoing process to consider other state frameworks, particularly New South Wales, to better align cross-jurisdictional species regulation. This process will also provide an opportunity to review and re-categorise species that become prohibited under the licencing framework — typically animals that are currently lawfully kept, but were not included on the species list through lack of information about *keeping* habits.

Exempt species

Birds

In addition to the proposed new 28 bird species exemptions under the Consultation RIS, a further 18 species have been considered for exemption under the final position.

Reptiles and amphibians

Consistent with the approach under the Consultation RIS, no species of reptiles or amphibians will be exempt.

Following feedback in relation to New South Wales' proposed 'code' approach, a proposal to exempt a sub-set of reptiles and amphibians was discussed with the Wildlife Advisory Committee. Although some members of the Committee were supportive of exemptions, there was no consensus from members. Concerns raised by Committee members included the risk of impulse purchasing and biosecurity risks if animals were released.

Following these discussions, the department undertook a further analysis of the benefits and risks for exempting reptiles and amphibians and sought advice from Biosecurity Queensland.

Under the *Biosecurity Act 2014*, all Queenslanders are responsible for managing biosecurity risks that are under their control and that they know about, or should reasonably be expected to know about. Under this obligation, all individuals and organisations whose activities pose a biosecurity risk must:

- take all reasonable and practical steps to prevent or minimise each biosecurity risk;
- minimise the likelihood of causing a biosecurity event, and limit the consequences if such an event is caused; and

- prevent or minimise the harmful effects a risk could have, and not do anything that might make any harmful effects worse.

The Queensland Government also has an obligation under the *Nature Conservation Act 1992* to identify, and reduce or remove, the effects of threatening processes relating to wildlife.

As a range of diseases confirmed in captive-populations are not yet documented in wild populations, the Queensland Government needs to adopt a precautionary approach. Under the Nature Conservation (Administration) Regulation 2017, the precautionary principle means the principle that, if there are threats of serious or irreversible environmental damage, lack of full scientific certainty must not be used as a reason for postponing measures to prevent threatening processes.

Consequently, there is an obligation for the State to *take* reasonable and practical steps to minimise the effect of potential disease spreading from captive populations into the wild.

Whilst requiring people to have a licence will likely have no bearing on whether their animal escapes, or is released into the wild, it will provide the State with information relevant to the management of biosecurity risks from an escaped or released animal. By requiring animals to be kept under a licence, licence holders are obligated to report – in their online *record book* under the final position – any animals that are lost or that have escaped. Depending upon the scale of escape and the potential disease risks associated with the animals, such reporting may allow the State to activate a biosecurity response to monitor for, and control, any potential disease outbreaks in wild populations.

Conversely, in the absence of licencing and reporting, escaped or released animals may infect wild populations without anybody knowing. Given the high mortality rate and contagious nature of some of these diseases, the State will have failed in meeting its obligations if there is no way to monitor, track, or address potential outbreak sources.

Class 1 species

Birds

Under the Consultation RIS, 33 species of bird listed as 'commercial' under the current framework were proposed as class 1. An additional 13 species that were proposed as class 2 in the Consultation RIS have now been categorised as class 1 animals in the final position.

Reptiles and amphibians

Under the current framework any least concern reptile or amphibian native to Australia, other than those listed as restricted, is classed as a 'recreational' animal. However, the Consultation RIS proposed to align with the current approach for listing bird species by removing the conservation status-based category and replacing it with a comprehensive *keeping* list for class 1 reptiles and amphibians.

Under the Consultation RIS, 34 reptile species (18 commercial, 27 recreational), and 7 amphibian species were proposed as class 1 animals.

The number of class 1 reptile species under the revised *keeping* list has now increased to 135, whilst the number of class 1 amphibian species has increased to 49 species.

Invertebrates

The Consultation RIS proposed protected invertebrate species (scorpions of the *Urodacus* genus and spiders of the Theraphosidae family) be regulated as class 1 animals, and this has remain unchanged in the final position.

Class 2 species

Birds

Under the Consultation RIS, 97 bird species were listed as class 2 animals. This included 48 species of bird listed as 'commercial', 'international', 'recreational' and 'restricted' under the current framework, and 49 new bird species

that are currently prohibited from being kept².

Under this revised proposal, 31 of these species remain as class 2, whilst an additional 45 currently prohibited species have been added.

Reptiles and amphibians

Under the current framework any *threatened* or *near threatened* reptile or amphibian, other than those listed as restricted – dangerous, is classed as a ‘restricted’ animal. The Consultation RIS proposed that a class 2 animal was any reptile or amphibian that wasn’t proposed as class 1 or prohibited. For reptiles, the prohibited list included 59 *least concern* species and, except for three species listed as class 2, all *threatened* and *near threatened* species. For amphibians, the prohibited list consisted of 89 *least concern*, *near threatened* and *threatened* species.

As part of the consultation process, it was decided to develop a comprehensive list of class 2 animals consistent with the approach taken for class 1 animals. After extensive engagement with key stakeholders, there are now 125 class 2 reptile species and 36 class 2 amphibian species under the final position.

Dangerous species

Dangerous snakes will remain as class 2 animals, but will be in a distinct 'dangerous' category of class 2. The dangerous category is still made up of the nine genera under the current framework, however three new species have been added to the dangerous class based on stakeholder feedback.

Prohibited animals

Under the final policy position, the proposed list of prohibited reptiles and amphibians has been removed. Instead, any animal that is not listed as an exempt, class 1 animal, or class 2 animal will by default be a prohibited animal. This aligns with the current approach for listing bird species.

Mammal keeping

The option to allow certain native mammals to be kept under the licencing framework was not proposed in the Consultation RIS and is not included in the final position.

The categorisation of animals from the current framework to the final approach by species group is represented below:

AMPHIBIANS

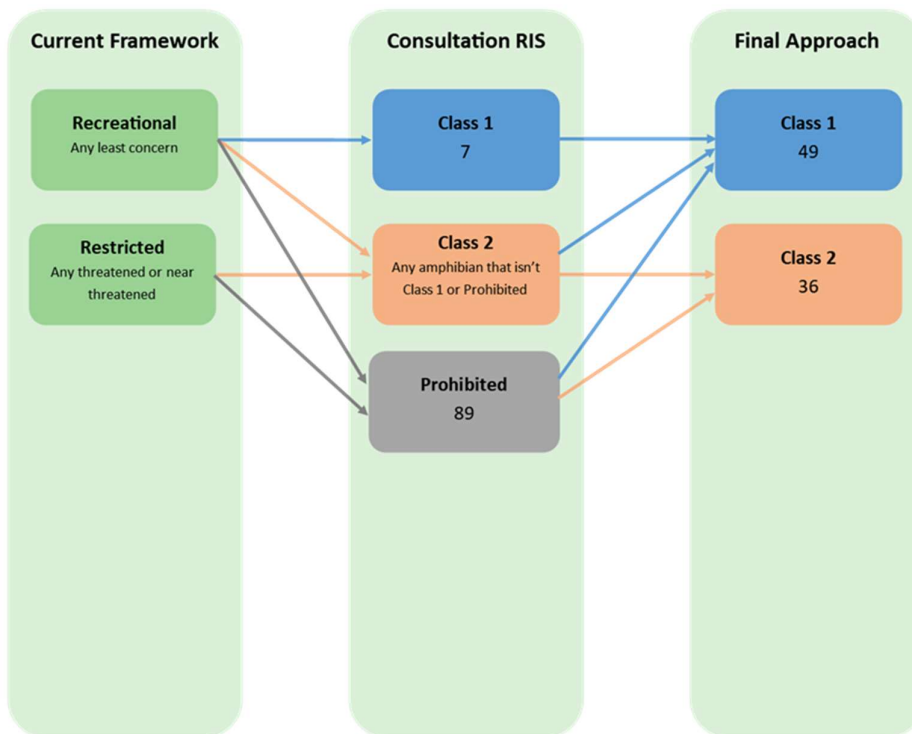
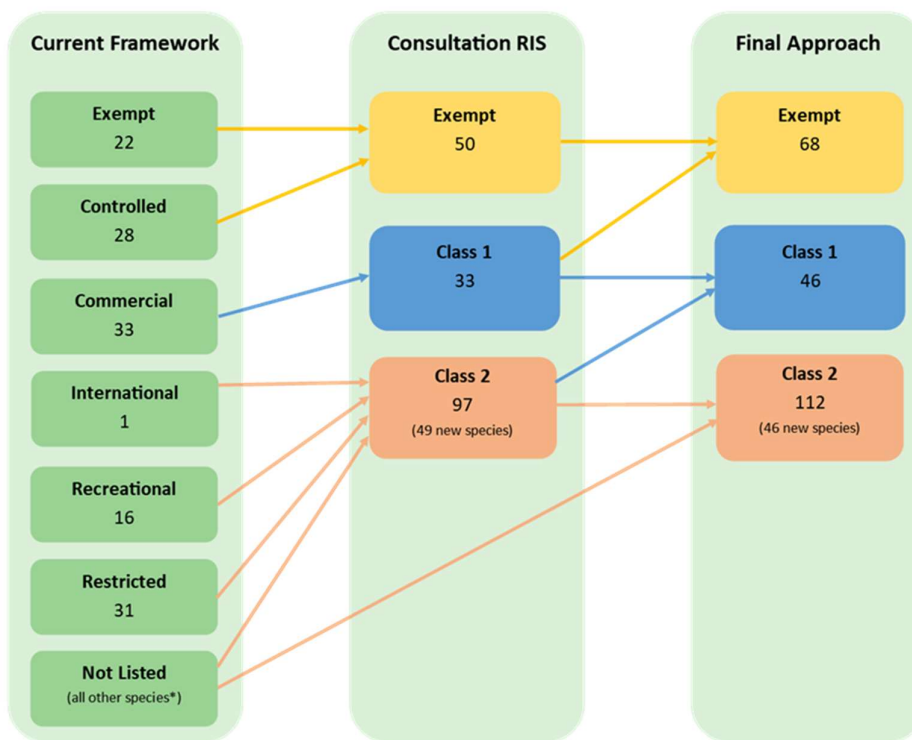


Figure 4. Changes to the categorisation of amphibians under the Consultation RIS and Decision RIS

BIRDS



*species not listed as exempt, controlled, commercial, recreational, international or restricted are currently prohibited from

Figure 5. Changes to the categorisation of birds under the Consultation RIS and Decision RIS

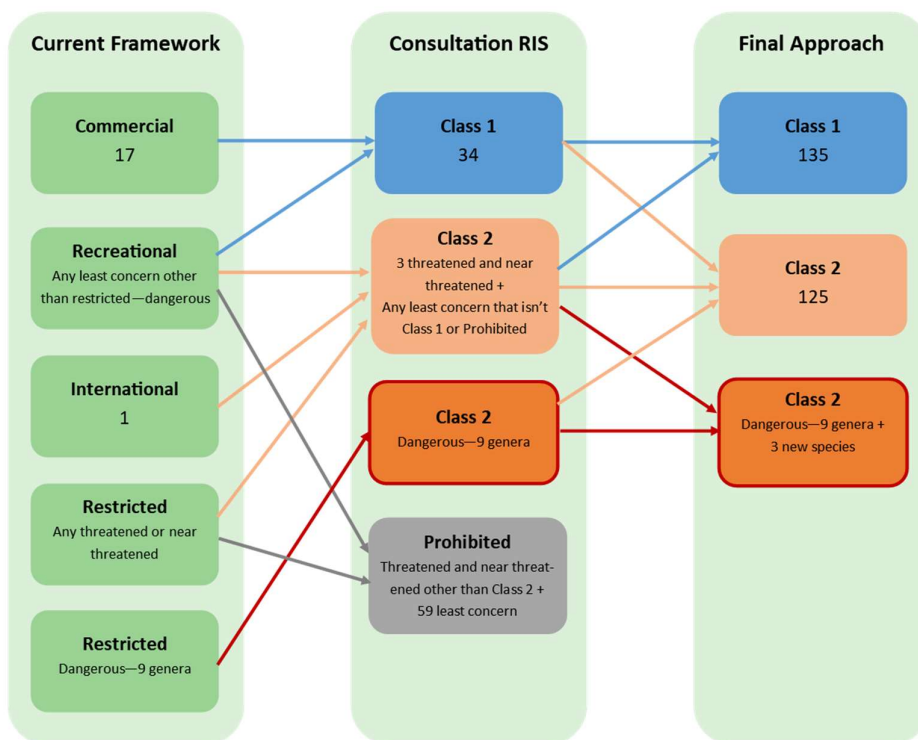


Figure 6. Changes to the categorisation of reptiles under the Consultation RIS and Decision RIS

Approach for the proposed licences

This section provides an overview of the final proposed approach for the *standard licence*, *specialised licence*, and *advanced licence*. A comparison between the consultation proposal and the final position is also illustrated in Figures 7, whilst attachment 6 provides examples of how the final licencing framework will affect existing licence holders.

The preferred licencing position presented in the Consultation RIS provided an estimated reduction in licence fees to approximately 78% of existing licence holders. However, following Consultation RIS feedback, the department reviewed — with the assistance of the Wildlife Advisory Committee — the proposed maximum limit on the numbers of animals permitted under the *standard* and *specialised licence*, the breeding limitations under the *specialised licence*, and the term of the *advanced licence*.

Although the proposed licence fees will not change, the department expects that these revisions, and the further refinements to species classifications, will reduce the impact of fees on recreational licence holders. The department now estimates that up to 90% of existing licence holders will see a reduction in licence fees under the final licencing position presented in this Decision RIS.

Standard licence

Term of licence and fee

Under the final position, the *standard licence* will remain as a five-year licence, with the fee initially being set at \$59.20. It may annually increase in line with the Government's indexation of fees and charges.

Number of animals and trading

The final position for the *standard licence* allows the *keeping* of up to 10 class 1 animals. This is double the number of animals that were permitted under the preferred option in the Consultation RIS.

This proposed limit of 10 class 1 animals better reflects the average number of animals kept by small scale *native wildlife* pet keepers. This increase addresses concerns raised in feedback on the Consultation RIS, and aligns with advice provided by the Wildlife Advisory Committee. The minor risks associated with increased animals kept under one *standard licence* are mitigated by improved tracking made possible by the mandatory online licencing system. The level of risk under this proposed limit will still be reduced in comparison to the current framework, with no limits and hardcopy *record-keeping*.

The current limitation under the Regulations on *trading* an animal within six months of acquisition will also continue to apply.

Breeding

The final approach for the *standard licence* is to retain the breeding prohibition that was proposed in the Consultation RIS. Where a person has accidentally allowed their animals to breed, they are in breach of their licence, but will be provided with three options to assist in rectifying this:

- upgrade their licence to a *specialised* or *advanced licence*;
- seek approval from the chief executive to sell or give away the animals once they are no longer dependent on their mother; or
- humane euthanasia.

In the majority of cases, euthanasia will only be required to dispatch eggs as opposed to hatched animals. To ensure euthanasia is undertaken humanely (i.e. by freezing), conditions can be placed on the permit to apply animal welfare standards such as those in the *Animal Care and Protection Act 2001*, or the 'Code of Practice: Care for sick, injured or orphaned Protected Animals in Queensland' under the NCA.

Record-keeping

Under the final position, *standard licence* holders will be required to keep *records* on the department's *online system* instead of in a hardcopy *record book*. Use of this *online system* will replace the need for a licence holder to fill in a *movement advice* when *trading* animals. This position has changed from the optional approach proposed under the consultation RIS preferred option as the majority of submission feedback in relation to *record-keeping* was supportive of a requirement for online *records*.

However, if this would cause unnecessary hardship, the licence holder can seek the department's permission to continue to use hardcopy *record books* and *movement advices*. Hardship for seeking use of hardcopy *records* is limited to circumstances where a person is not computer literate, does not have a computer or mobile device, or does not have an internet connection.

Timeframes for completing these *records* has increased to 72 hours relative to the current requirement for *records* to be entered on 'the same day' of an event occurring (e.g. *movement* – buy/sell). Where a person has received approval for use of hardcopy *records*, they may be required as a condition of their authority to annually provide the department with a *return of operations*.

Specialised licence

Term of licence and fee

Under the final position, the *specialised licence* will remain as a five-year licence, with the fee initially being set at \$316.90. It may annually increase in line with the Government's indexation of fees and charges.

Number of animals and trading

The *specialised licence* has been amended to reflect that hobbyists *keep* larger collections of animals than assumed under the Consultation RIS, and that they tend to breed their animals. Consequently, the proposed maximum limit of five animals and prohibition on breeding have been replaced by permitting:

- an unlimited number of protected scorpions and spiders, and unlimited breeding of these animals; and
- up to 50, in total, amphibians, birds, and reptiles at any given time.

The absence of a limit for protected scorpions and spiders ensures that the permit will not be contravened if the

individual breeds (i.e. scorpions and spiders may have several hundred offspring). This ability to *keep* and breed an unlimited number of protected scorpions and spiders will decrease pressure on wild populations by promoting captive breeding and discouraging wild collecting.

These new limits for the number of animals authorised under a *specialised licence* were endorsed by the Wildlife Advisory Committee. The risks associated with these new limits, such as an increase in *illegal trade*, are mitigated by improved tracking made possible by the mandatory online licencing system.

The current limitation under the Regulations on *trading* an animal within six months of acquisition will also continue to apply.

Dangerous snakes

Under a *specialised licence* a person will be permitted to have a maximum limit of 50 vertebrates – meaning at most 50 dangerous snakes if they have no other animals. There will also be a tiered approach to the *keeping* of dangerous snakes – meaning a person with no prior experience in *keeping* dangerous snakes cannot immediately *keep* animals that are considered more dangerous than others. Attachment 7 explains this approach in detail.

Breeding

Under the final position, the *specialised licence* will no longer be subject to a prohibition on breeding. Instead, licence holders will be permitted to breed invertebrates without restriction and will be able to breed vertebrates (reptiles, birds, and amphibians) provided the total number of all these animals is no greater than 50.

Where a person has accidentally allowed their animals to breed in excess of this 50 cap, they are in breach of their licence, but will be provided with three options to assist in rectifying this:

- upgrade their licence to an *advanced licence*;
- seek approval from the chief executive to sell or give away the animals once they are no longer dependent on their mother; or
- humane euthanasia (e.g. freezing eggs).

Record-keeping

Under the final position, *specialised licence* holders will be required to keep *records* on the department's *online system* instead of in a hardcopy *record book*. Use of this *online system* will replace the need for a licence holder to fill in a *movement advice* when *trading* animals.

However, if this would cause unnecessary hardship, the licence holder can seek the department's permission to continue to use hardcopy *record books* and *movement advices*. Hardship for seeking use of hardcopy *records* is limited to circumstances where a person is not computer literate, does not have a computer or mobile device, or does not have an internet connection.

Timeframes for completing these *records* has increased to 72 hours relative to the current requirement for *records* to be entered on 'the same day' of an event occurring (e.g. *movement* – buy/sell). Where a person has received approval for use of hardcopy *records*, they may be required as a condition of their authority to provide the department with a *return of operations* every three months.

Advanced licence

Term of licence and fee

Under the final position, the *advanced licence* has been changed from having a three-year term to a five year term. The fee will initially be set at \$682.90, consistent with the fee proposed in the Consultation RIS. It may annually increase in line with the Government's indexation of fees and charges.

Number of animals

The *advanced licence* has been amended to remove the current linkage to the maximum limits imposed on recreational licences. However, a limit will continue to be placed on the maximum number of permitted dangerous snakes. Under this proposal, a person will be permitted to *keep* a maximum of 50 – aligning with the maximum limit under the *specialised licence* – unless they can demonstrate to the chief executive that they can safely,

competently and humanely *keep* a larger number.

Dangerous snakes

In addition to limit restrictions mentioned above, there will also be a tiered approach to the *keeping* of dangerous snakes – meaning a person with no prior experience in *keeping* dangerous snakes cannot immediately *keep* animals that are considered more dangerous than others. Attachment 7 explains this approach in detail.

Breeding

As there are no limits on the numbers of animals permitted – with the exception of dangerous snakes – there is no limit on breeding under this licence. However, where a person does exceed the limit of permitted dangerous snakes, they are in breach of their licence, but will be provided with three options to assist in rectifying this:

- seek approval from the chief executive to sell or give away the animals once they are no longer dependent on their mother;
- humane euthanasia (e.g. freezing eggs); or
- seek approval from the chief executive to *keep* the animals, provided that the person can demonstrate skill in raising the animals, and facilities for safe *keeping*.

Record-keeping

Under the final position, *advanced licence* holders will be required to keep *records* on the department's *online system* instead of in a hardcopy *record book*. Use of this *online system* will replace the need for a licence holder to fill in a *movement advice* when *trading* animals.

However, if this would cause unnecessary hardship, the licence holder can seek the department's permission to continue to use hardcopy *record books* and *movement advices*. Hardship for seeking use of hardcopy *records* is limited to circumstances where a person is not computer literate, does not have a computer or mobile device, or does not have an internet connection.

Timeframes for completing these *records* has increased to 72 hours relative to the current requirement for *records* to be entered on 'the same day' of an event occurring (e.g. *movement* – buy/sell). Where a person has received approval for use of hardcopy *records*, they may be required as a condition of their authority to provide the department with a *return of operations* every three months.

Commercial keep of class 2 animals

Under the *advanced licence* it is proposed to allow commercial operators to access species currently only permitted to be kept by recreational licence holders. However, the department recognises that there will be certain species such as venomous snakes and certain birds with complex husbandry needs that will not be suited for commercial premises. This is because public safety may be at risk, and husbandry and welfare standards would not be met. Consequently, if a commercial operator cannot meet husbandry, welfare and safety standards, they cannot *keep* those species on their premises.

However, commercial operators may still choose to *keep* these particular species at a private premises, where husbandry, welfare and safety requirements can be met, and *trade* these animals from there. In this instance, a commercial operator will be required to obtain a separate licence for each premises.

Unregulated take from the wild

The department will continue to progress the preferred approach under the Consultation RIS. There will no longer be unregulated 'recreational' *take* of amphibians and protected scorpions and spiders from the wild, and commercial harvesting of protected scorpions and spiders will continue under an appropriate licence.

Under this approach:

- Protected scorpions and spiders can only be taken from the wild under a harvesting licence, collection authority, educational permit, or scientific purposes permit.
- Amphibians can only be taken from the wild under a collection authority, educational permit, or scientific purposes permit. Given the risk of spreading disease to captive populations or between wild populations,

and misidentification issues with species, harvesting licences will not be issued for amphibians. The other licences are for small scale animal interaction purposes. These activities present less potential for diseased animals to be introduced into captive breed populations.

- The *keep* of these animals for *recreational purposes* or *commercial purposes* will require a licence, and recreational *keepers* must purchase an animal from a licenced seller.

Administrative amendments

The department will continue to progress the proposed amendments to streamline regulations and reduce regulatory burden as outline in the Consultation RIS, including:

- removing the need for state museums to require a licence to undertake scientific and educational activities;
- approved management plans replacing permits for commercial airport authorities to undertake damage mitigation for public safety;
- providing an exemption for the Australian Defence Force to require collection authority for training purposes;
- providing an exemption for non-commercial harvesters to collect and *use* naturally discarded animal parts;
- clarifying the responsibilities and liability wildlife authority holders and relevant person/s;
- specifying an approach distance for seals and drone approach distance for other marine mammals; and
- allowing the mutation of captive-bred reptiles.

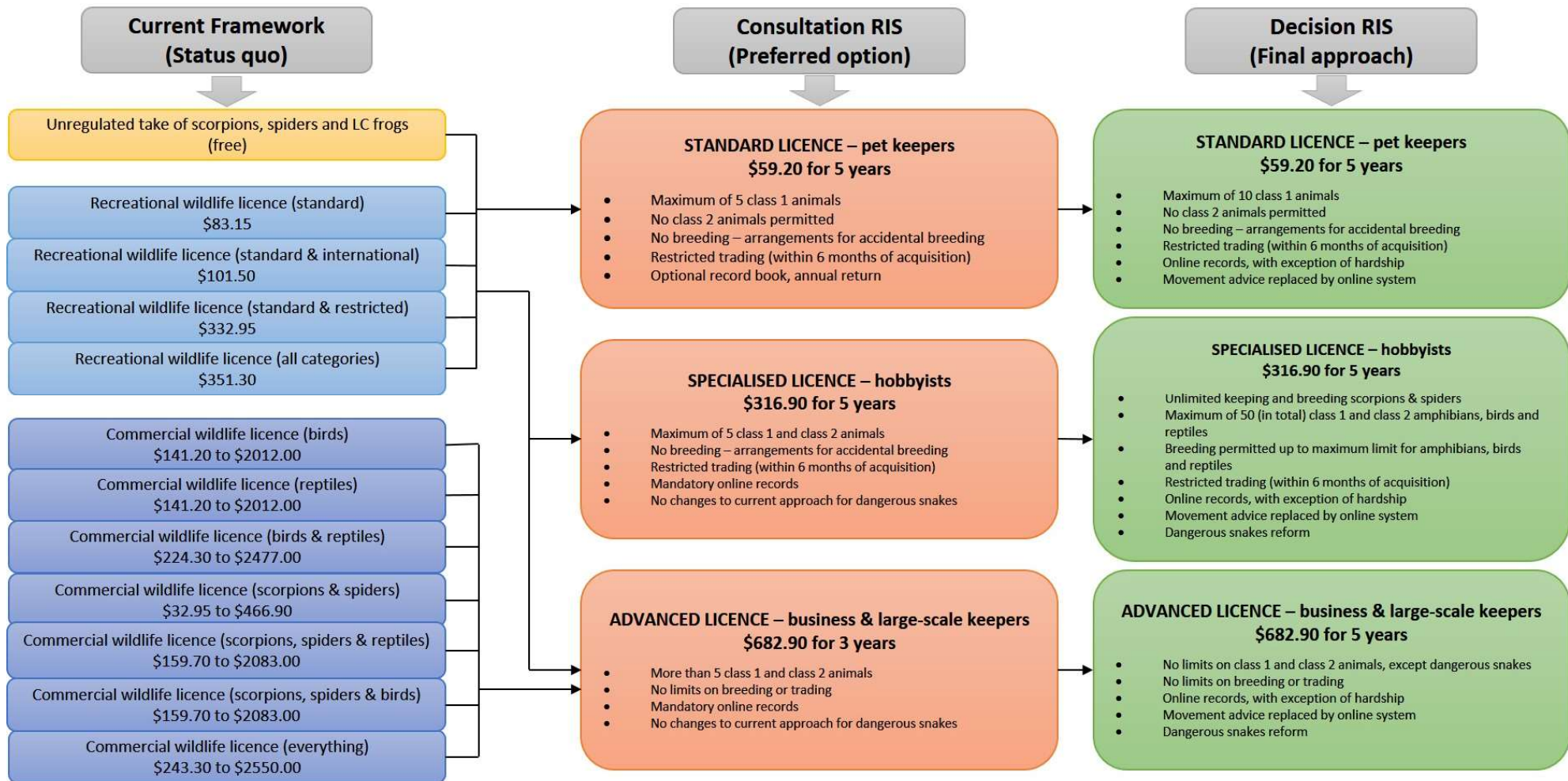


Figure 7: Comparison of Consultation RIS option and final preferred option

Benefits and costs of final preferred position

Issue 1 – The revised licencing framework

Generally, many aspects of the licencing framework recommended in the Consultation RIS have been adopted in the final position. As a result, the impacts of the final licencing framework on business and government are similar to those presented in the Consultation RIS. However, in considering consultation feedback, changes to the number and type of animals that can be kept under *standard* and *specialised licences* has significantly reduced the impacts on the community. The detailed working to arrive at the licencing and cost assumptions is provided in Attachment 9: Financial analysis report.

Business and industry

Benefits

The final position resolves the complexity of distinguishing between recreational and commercial activities. It provides an equitable regulatory structure to all persons and businesses wanting to *keep* and *trade protected animals* in captivity. Business and industry will consequently benefit from the capacity to *keep* and sell an increased range of species, and expand their operations into the surrogate market currently operated by *recreational wildlife licence* holders.

The *advanced licence* removes the regulatory burden of seven categories of licence and the three periods of licence validity by establishing a single licence fee of \$682.90. The term of an *advanced licence* has increased to 5 years—previously recommended as 3 years in Consultation RIS. This provides consistency across the terms of all licence types under the revised licencing framework. The *advanced licence* is estimated to result in savings to the commercial wildlife sector of \$0.15 million per year. This is illustrated in Table 3. This estimate is based on *commercial wildlife licence* holders paying \$682.90 for an *advanced licence* instead of \$2,175.57 for a *commercial wildlife licence* for a period of one to three years. The fee of \$2,175.57 is the average fee for the seven licence categories for the 'one to three year' licence term.

Table 3: Projected transition of current licences to an *advanced licence*

Licences that would be required to transition from 'Commercial wildlife licence Commercial wildlife I' to 'Advanced licence'							
Scenario	No. of licences/year (average)	Current \$/licence (average)	Current cost to business	Proposed \$/licence	Reduction \$/licence	Total estimated cost to business	Savings relative to status quo
Decision RIS	101	2,175.57	0.220M	682.90	1,492.67	0.069M	\$0.151M

The maximum saving for an individual business is estimated to be \$1,867.10 per licence. This estimate is based on the business having a 'one to three year' licence allowing the *keep* of all commercial species under the current framework. Currently, a licence with these features costs \$2,550.00 for a three year period (\$850.00 per year), whilst under the proposed framework the equivalent licence – the *advanced licence* – would cost \$682.90 and is valid for a further two years (\$136.60 per year).

Costs

The projected impact of the *advanced licence* provides a net benefit to business as outlined above. However, the revised licence fee applicable to the final position may result in increased licence costs for some individual businesses.

There are currently four licence holders who will face an increase in cost as they currently have licences that only permit the sale of protected scorpions and spiders. As these licences will transition to a five-year *advanced licence* under the new framework there will be an increase in fees ranging from \$216.00 and \$516.50 relative to their current one year and three year licences. Borne out over the five year period of the *advanced licence*, this represents an additional annual cost of \$43.20 and \$103.30 respectively. With these animals selling for an average wholesale price

of \$25.00 each, and retail sale prices above this, it would *take* a few extra sales per year for the licence holders to recoup this extra licence cost. This additional cost should be offset by commercial operators having access to a significantly larger suite of animals for commercial *trading* than is currently available.

For *commercial wildlife licence* holders who hold a small number of animals for *trade*, the fee increase may affect the viability of the business if they wish to continue selling native animals. However, this is dependent on which of the seven current licence categories they operate under.

Government

Benefits

The final position provides a modernised risk-based licencing and compliance approach based on cost recovery to administer this framework. It offers an enhanced and pro-active compliance approach that will allow the department to achieve the objectives of its *Regulatory Strategy*.

The tiered licencing approach under the final position, in conjunction with the *online system* for *record-keeping*, enables the government to better identify licence holders that are undertaking higher risk operations such as *trading* and/or large-scale breeding, and therefore focus compliance resources towards these high-risk licence holders.

For example, under the current licencing framework, where *recreational wildlife licence* holders can *keep* any number of animals and/or breed without constraint, a common way of disguising illegal *take* of wild animals, or the illegal purchase of animals is to *record* these animals as captive-bred offspring resulting from a breeding event.

However, the final position limits the number of animals that can be kept at any one time (via *trading* and breeding restrictions), particularly under *standard licences* and *specialised licences*. This approach, together with a more responsive *record* system, allows government to quantify and track the number of animals available for 'recreational' *trading*, and therefore significantly reduces a licence holder's ability to disguise illegal *take* or purchase of animals.

Costs

Consistent with the cost recovery approach of the Consultation RIS preferred position, there is no new economic cost to government under the final position. Although the licence fee revenue differs from the Consultation RIS due to changes in the expected number of licence holders for each licence type (refer to Table 19 of Attachment 9: Financial analysis report), the final position still represents a full cost-recovery approach to general administration of the licencing framework. This is due to the fact that the number of specialised and advanced licences will have decreased, and therefore the number of licences requiring an extended investigation time (refer to tables 14-16 of Attachment 9: consultation report). This will reduce the cost of administering the framework, proportional to the decrease in departmental revenue. A summary of government costs and revenue for each scenario is provided in Table 4.

Table 4: Average annual cost to government

Scenario	Average fee revenue	Cost to department		Difference (revenue less cost to department)
		Average assessment cost	Average compliance & investigation cost	
Status quo	\$0.910M	\$0.267M	\$0.600M	\$0.043M*
Consultation RIS (preferred option)	\$1.412M	\$0.927M	\$0.485M	\$0
Decision RIS	\$0.917M	\$0.649M	\$0.268M	\$0

*Based on estimates, 2017/18 was first financial year that government recovered costs of administering licences since 2006

Community and environment

Benefits

Under the final position, the community may benefit from greater accessibility to native animals through commercial

operators increasing captive-bred stock of species previously unavailable for commercial licence holders. Commercial operators will be operating under the *advanced licence* with no restrictions on breeding or the number of animals available for *commercial purposes*. The additional supply may reduce retail prices for some native animals.

From a social and environmental perspective, the final position reduces the potential risk of animal poaching and the illegal buying and selling of animals, particularly for native reptile, amphibian, and bird species that are currently restricted for *recreational purposes* by creating a regulated market, which removes the incentive to poach from the wild. The equitable access to these species for both *commercial purposes* and *recreational purposes* will improve *trade* and captive-breeding practices, which may also lead to reduced monetary incentives to unlawfully poach animals from the wild and illegally purchase animals.

Due to disease risks associated with *keeping* reptiles and amphibians, maintaining these species under the licencing framework is consistent with the 'precautionary principle' to ensure conservation objectives of the *Nature Conservation Act 1992* are met, and with the State's general biosecurity obligations under the *Biosecurity Act 2014*.

Expanding the native animal *keeping* industry and encouraging more people to connect with nature may also lead to increased community awareness and education on species conservation issues.

Costs

The impacts on current *recreational wildlife licence* holders varies depending on their activity. Under the final position the fee for a *standard licence* will be cheaper for a person wanting to *keep* native animals for personal enjoyment, and not for *trade* or breeding purposes. However, the final position places greater restrictions on the number and type of animals that can be kept for personal enjoyment compared to the current regulatory framework (status quo).

Recreational wildlife licence holders can choose to operate under any of the new licence types. The fee they will pay will depend on:

- the species of animals they choose to *keep*;
- the number of animals they choose to *keep*; and
- whether they intend to breed and *trade* their animals.

The licence fees will increase for current *recreational (standard) wildlife licence* holders who are wanting to *keep* specialised animals, or *keep* more animals than allowed under a *standard licence*. A *specialised licence* or *advanced licence* will be required depending on number of animals kept, levels of breeding and *trade* activities. The *specialised licence* fee will remain largely the same as the equivalent *recreational (restricted) wildlife licence* under the current framework. Despite the fee increase for an *advanced licence*, it is arguable that current *recreational wildlife licence* holders who undertake frequent *trade* or who *trade* high-value *protected animals* should already be operating under a *commercial wildlife licence*. The \$682.90 *advanced licence* fee is less than the current corresponding *commercial wildlife licence* fee.

If a person currently *keeps* more animals than they are willing to pay for under the new licencing framework, they can avoid a fee increase by altering the number and species of animals they *keep*, and amending their breeding and *trade* practices to be in accordance with the relevant licence requirements. Animal surrender, or sale prior to the current licence expiring are options in this circumstance.

By limiting breeding under the *standard licence* and specifying limits on the number of animals that can be kept under a *standard licence* and *specialised licence*, licence holders will at times be required to humanely dispose of animals (e.g. freezing eggs following breeding). Rather than humanely destroying offspring, a person may be inclined to release these animals into the surrounding natural environment. This increases the risk of captive-bred animals potentially affecting wild populations, such as biosecurity threats. However, strategies to mitigate this risk are in place by allowing these people to either seek an upgrade to their licence, or to seek the Chief Executive's permission to *trade* the animals once they are no longer dependent young.

There may also be environmental risks associated with allowing a greater variety of species to be kept in Queensland. This is because there may be an increased risk of *protected animals* being unlawfully released into the wild, which potentially could have disease and genetic impacts on local and regional wild populations. However, given the challenges of detecting and monitoring species incursions and their effect on wild populations throughout Queensland, it is unclear whether any such impacts have already occurred, or are likely to occur, under the existing regulatory framework. Therefore, there is no practical method of distinguishing or comparing these potential impacts

under the final position. It is expected that the likelihood of these impacts occurring will not significantly differ irrespective of the regulatory framework in place.

Licence transitions and fee changes

Under the final fee structure, it is estimated that up to 90% of current *recreational wildlife licence* holders (approximately 6,900 per year) will be paying a cheaper licencing fee relative to the status quo as they transition to a *standard* or *specialised licence*. This means an additional 880 licence holders will be paying a cheaper licence fee compared to the recommended position in the Consultation RIS. The estimated net saving to customers under the final fee structure, compared to the current fee structure, is \$0.173 million per annum.

Some licence holders will be required to move to either a *specialised licence* or an *advanced licence*, which will be more expensive than their current licence. This will impact an estimated 10.3% of licence holders (approximately 795 per year) who will need to pay between \$215.40 and \$599.75 more per licence, depending upon the licence type that they currently possess. The estimated net additional cost to these permit holders is \$0.322 million per annum.

However, relative to the status quo, the fee increase is a truer reflection of cost recovery for a pro-active compliance and enforcement program. This is because these are the highest-risk licensees from a non-compliance perspective as they face fewer restrictions on the *keeping*, *breeding* and *trading* of animals. This includes dangerous snakes and animals attractive to illegal wildlife *trade*. The expected transition rates are further explained below.

Transition to standard licence

It is expected that 87% of *recreational wildlife licence* holders will transition to a *standard licence*. This transition will result in a fee decrease from the current fee of \$83.15 to \$59.20 per licence. This results in an estimated total saving, relative to status quo, of approximately \$0.153 million per annum. This is illustrated in Table 5, which provides a comparison of costs associated with the recommended option in the Consultation RIS.

The transition from a recreational (international) licence to a *standard licence* will also result in a licence fee decrease of \$42.30 – from \$101.50 to \$59.20. This is projected to be a total decrease in fees for this licence type, relative to status quo, of \$0.015 million per annum. Under the recommended option in the Consultation RIS, international licence holders would have transitioned to a *specialised licence* – \$316.90, or an *advanced licence* – \$682.90, as *international animals* were considered class 2 animals. These animals will now be class 1 under the final position and it is expected that 346 *international licence* holders will now transition to a *standard licence*. This is illustrated in Table 5.

Table 5: Projected transitions of current recreational wildlife licences to a standard licence

Licences that would be required to transition from 'Recreational (standard) Licence' to 'Standard Licence'							
Option	No. of licences/year (average)	Current \$/licence	Current cost to community	Proposed \$/licence	Saving \$/licence	Estimated total cost to community	Estimated saving relative to status quo
Consultation RIS	5,889	\$83.15	\$0.489M	\$59.20	\$23.95	\$0.348M	\$0.141M
Decision RIS	6,374	\$83.15	\$0.530M	\$59.20	\$23.95	\$0.377M	\$0.153M
Licences that would be required to transition from 'Recreational (international) Licence' to 'Standard Licence'							
Option	No. of licences/year (average)	Current \$/licence	Current cost to community	Proposed \$/licence	Saving \$/licence	Estimated total cost to community	Estimated saving relative to status quo
Consultation RIS	Nil	--	--	--	--	--	--
Decision RIS	346	\$101.50	\$0.035M	\$59.20	\$42.30	\$0.020M	\$0.015M

Transition to specialised licence

The department estimates that the final licence structure will see approximately 5% of the total number of *recreational wildlife licences* transition from a recreational (standard) licence to a *specialised licence*. The licence fee increases by \$233.75 – from \$83.15 to \$316.90. This equates to an estimated additional total cost, relative to status quo, of \$0.091 million per annum for this licence type. This is illustrated in Table 6 which provides a comparison of costs associated with the recommended option in the Consultation RIS.

The transition from a recreational (international) licence to a *specialised licence* will result in a licence fee increase of \$215.40 – from \$101.50 to \$316.90. This is projected to be a total increase in fees for this licence type, relative to status quo, of \$0.004 million per annum. However, in comparison to the consultation RIS recommended option, the department estimates that under the final position 243 people will transition to a cheaper *standard licence* instead of the *specialised licence*.

The transition from a recreational (restricted) licence to a *specialised licence* will result in a licence fee decrease of \$25.23 – from \$342.13 to \$316.90. This is projected to be a total decrease in fees for this licence type of \$0.005 million per annum, relative to status quo. The final position will see an additional 52 recreational (restricted) licence holders transition to a *specialised licence*, rather than transitioning to an *advanced licence* based on increasing animal limits under the *specialised licence*. This is illustrated in Table 6.

Table 6: Projected transitions of current recreational wildlife licences to a specialised licence

Licences that would be required to transition from 'Recreational (standard) Licence' to 'Specialised Licence'							
Option	No. of licences/year (average)	Current \$/licence	Current cost to community	Proposed \$/licence	Extra \$/licence	Estimated total cost to community	Estimated cost relative to status quo
Consultation RIS	262	\$83.15	\$0.022M	\$316.90	\$233.75	\$0.083M	\$0.061M
Decision RIS	391	\$83.15	\$0.033M	\$316.90	\$233.75	\$0.124M	\$0.091M
Licences that would be required to transition from 'Recreational (international) Licence' to 'Specialised Licence'							
Option	No. of licences/year	Current \$/licence	Current cost to community	Proposed \$/licence	Extra \$/licence	Estimated total cost to community	Estimated cost relative to status quo
Consultation RIS	262	\$101.50	\$0.026M	\$316.90	\$215.40	\$0.083M	\$0.057M
Decision RIS	19	\$101.50	\$0.002M	\$316.90	\$215.40	\$0.006M	\$0.004M
Licences that would be required to transition from 'Recreational (restricted) Licence' to 'Specialised Licence'							
Option	No. of licences/year	Current \$/licence	Current cost to community	Proposed \$/licence	Saving \$/licence	Estimated total cost to community	Estimated saving relative to status quo
Consultation RIS	131	\$342.13	\$0.045M	\$316.90	\$25.23	\$0.042M	\$0.003M
Decision RIS	183	\$342.13	\$0.063M	\$316.90	\$25.23	\$0.058M	\$0.005M

Transition to advanced licence

The most significant economic cost to the community involves *recreational wildlife licence* holders that choose to transition to an *advanced licence*. However, the final position has significantly reduced this impact compared to the recommended option in the Consultation RIS. The number of *recreational wildlife licences* required to transition to an *advanced licence* is now expected to be only 385, compared to 1,154 licence holders in the Consultation RIS.

Under the licence structure of the final position, approximately 5% of the total number of *recreational wildlife licences* would transition from a recreational (standard) licence to an *advanced licence*. The licence fee increases by \$599.75 – from \$83.15 to \$682.90. This equates to a total increase in fees for this licence type, relative to the status quo, of \$0.213 million per annum. This cost breakdown compared to the recommended option in the Consultation RIS is shown in Table 7.

The transition from a recreational (international) licence to an *advanced licence* results in a licence fee increase of \$581.40 – from \$101.50 to \$682.90. This is projected to be a total increase in fees for this licence type, relative to the status quo, of \$0.011 million per annum. The transition from a recreational (restricted) licence to an *advanced licence* results in a licence fee increase of \$340.77 – from \$342.13 to \$682.90. This is projected to be a total increase in fees for this licence type, relative to the status quo, of \$0.003 million per annum. This cost breakdown is shown in Table 7.

Despite these fee increases, it is arguable that current *recreational wildlife licence* holders who receive a gain or reward from their wildlife (e.g. if they undertake frequent *trade* or *trade* high-value *protected animals*) should currently be operating under a *commercial wildlife licence*. Using the same assumptions as those used for the commercial industry for the type of licences commercial holders are operating under, these *traders* would be saving \$1,486 for a licence relative to a comparative *commercial wildlife licence* of \$2,169 under the status quo.

Table 7: Projected transitions of current recreational wildlife licences to an advanced licence

Licences that would be required to transition from 'Recreational (standard) Licence' to 'Advanced licence'							
Option	No. of licences/year	Current \$/licence	Current cost to community	Proposed \$/licence	Extra \$/licence	Estimated total cost to community	Estimated cost relative to status quo
Consultation RIS	1,085	\$83.15	\$0.090M	\$682.90	\$599.75	\$0.741M	\$0.651M
Decision RIS	356	\$83.15	\$0.030M	\$682.90	\$599.75	\$0.243M	\$0.213M
Licences that would be required to transition from 'Recreational (international) Licence' to 'Advanced licence'							
Option	No. of licences/year	Current \$/licence	Current cost to community	Proposed \$/licence	Extra \$/licence	Estimated total cost to community	Estimated cost relative to status quo
Consultation RIS	46	\$101.50	\$0.004M	\$682.90	\$581.40	\$0.031M	\$0.027M
Decision RIS	19	\$101.50	\$0.002M	\$682.90	\$581.40	\$0.013M	\$0.011M
Licences that would be required to transition from 'Recreational (restricted) Licence' to 'Advanced licence'							
Option	No. of licences/year	Current \$/licence	Current cost to community	Proposed \$/licence	Extra \$/licence	Estimated total cost to community	Estimated cost relative to status quo
Consultation RIS	23	\$342.13	\$0.008M	\$682.90	\$340.77	\$0.016M	\$0.008M
Decision RIS	10	\$342.13	\$0.003M	\$682.90	\$340.77	\$0.006M	\$0.003M

Summary of community impacts under the proposed options compared to the current licencing framework

Figures 8 and 9 provide a summary of the community benefits and costs for the proposed options compared to the current licencing framework.

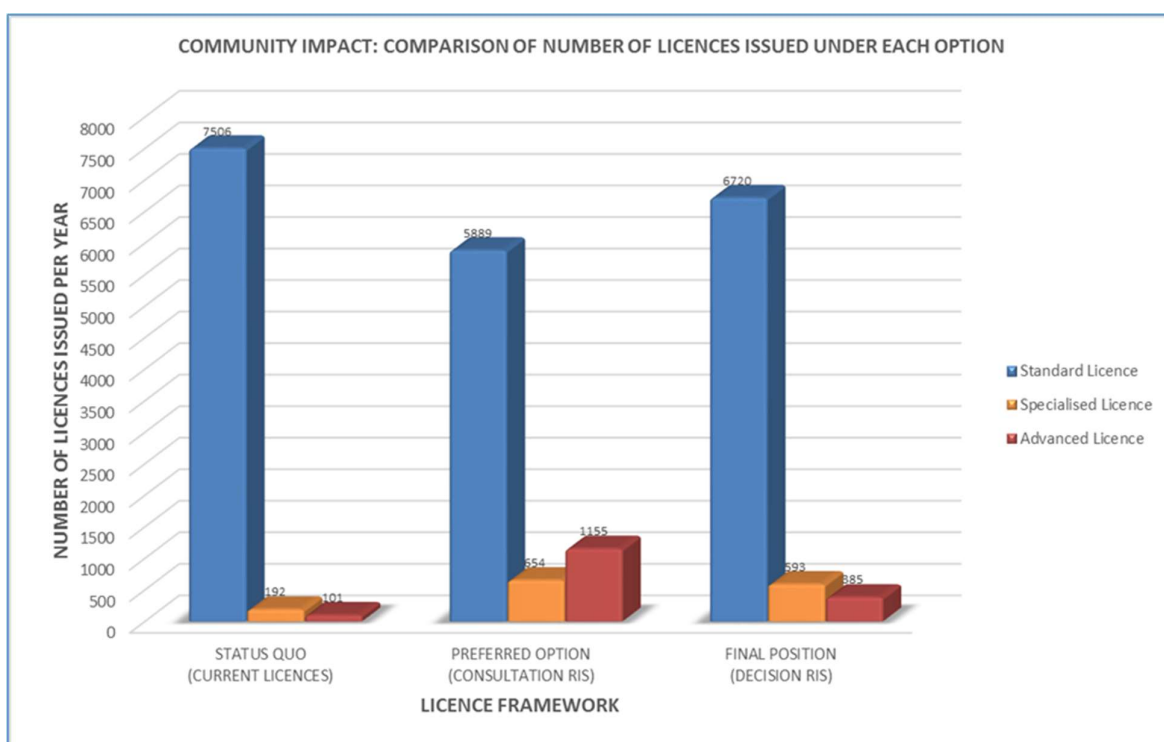


Figure 8: Summary of community benefits and costs for proposed options compared to current licencing framework

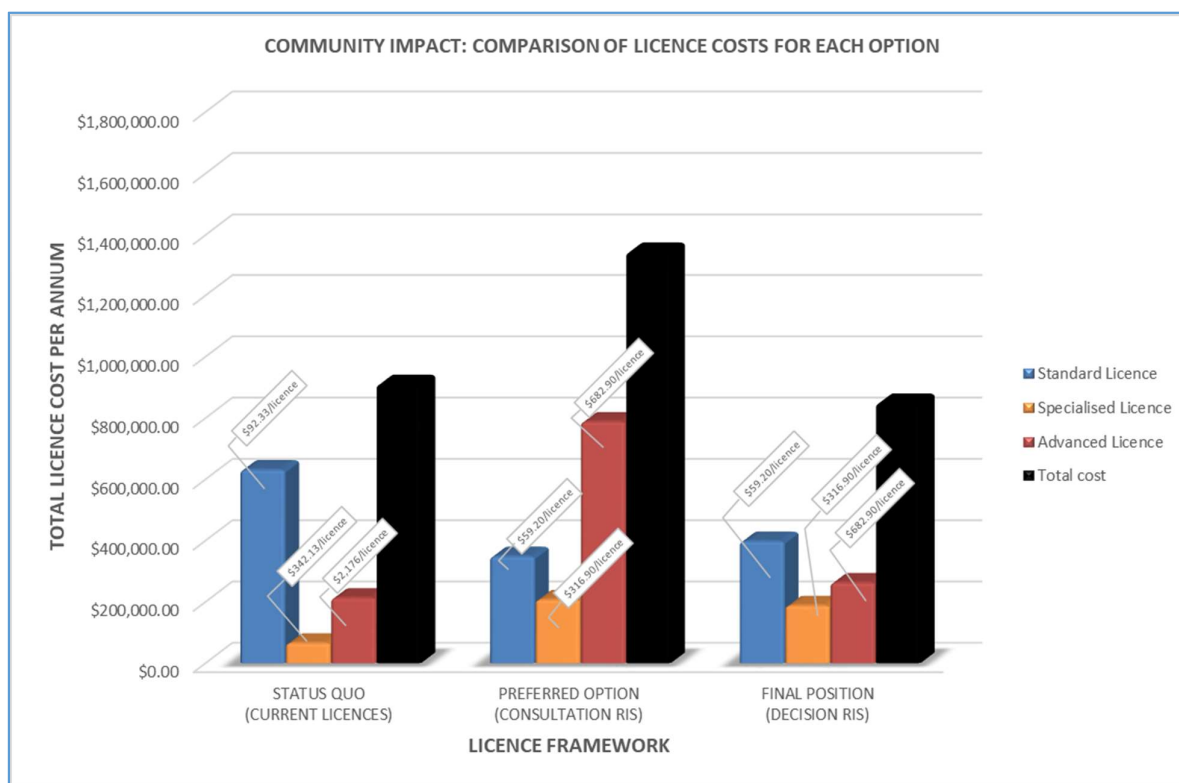


Figure 9: Summary of community benefits and costs for proposed options compared to current licencing framework³

Issue 2 – Improved record-keeping requirements

As outlined above, the current systems for hardcopy *record*-keeping and *recording* wildlife *movement* and *trade* present loophole for *illegal trade*.

The current *hardcopy* system for *trading protected animals* is also outdated for the level of *trade* which occurs in Queensland. Licence holders must keep a *record book* on their premises, which must document species type, and details around when the animal is bought, received, sold, or given away. These *records* are not submitted to the department.

The Consultation RIS proposed shifting to mandatory online *record*-keeping and reporting of *movements* for all licence holders.

Under the final position, all licence holders will be required to keep the same *records* as required under the current framework, within 72 hours of an event occurring.

The final position will also require all licence holders (*standard*, *specialised* and *advanced licences*) to keep *records* in the department's *online system*. However, if this would cause unnecessary hardship (e.g. licence holder does not have a computer or internet connection), the licence holder can seek the department's permission to continue to use hardcopy *record books* and *movement advices*. Where a hardcopy *record book* is used, the licence holder must annually submit a copy of these *records* to the department.

Business and Industry

Benefits

The final position requires commercial operators to keep electronic *records* in the department's electronic system,

³ For the purpose of comparison across the options, licences under 'Status quo' have been depicted based on the expected transition from commercial and recreational wildlife licences into the proposed licence types.

unless they can demonstrate hardship. As these *records* are currently *recorded* in a hardcopy book, this option may save time and effort associated with business transactions, as many businesses will currently manage their *records* digitally, reflected by the broad support from stakeholders for moving to an electronic *record-keeping* system. This option also removes costs associated with meeting *record-keeping* requirements for *protected animals*, related to purchasing the department's prescribed hard copy *record book* and submitting *records* manually – for example, through the post.

The requirement for submitting *records* online may also improve the quality of *record-keeping* for some businesses. This would support improved commercial outcomes and reduce unintended non-compliance, as a result of keeping hardcopy *records*. For example, if a hardcopy *record* entry is not in ink, or is illegible, the *record* is non-compliant. Requiring *records* to be provided online may also support some businesses by improving their stock inventory processes, as numbers and species tallies will be more readily available than undertaking a manual count of entries in the hardcopy *record book*.

Transitioning *movement advices* to online *records* provides greater benefits for *trading protected animals* within Queensland. This is because the online completion of a *movement record* results in an entry being automatically lodged in the department's system, instead of the need to post this notification as per the current licencing framework.

Costs

While use of the *online system* provides a number of benefits, it may result in increased costs to meet *record-keeping* requirements where commercial operators require equipment and internet access beyond what they already have for related business transactions. This potential cost is negligible as it is likely that almost all businesses are already connected to the internet. However, to mitigate this, where the mandated use of the electronic system would cause unnecessary hardship they can seek the department's approval to continue using the *hardcopy system*.

Should a business incur a cost because they purchase a device or internet connection in order to use the online *record* system, this may be offset through their access to a greater number of species than is currently available for commercial sale. For example, this includes high value reptiles that are currently only available to recreational *keepers*, and bird species not currently permitted in Queensland.

Government

Benefits

The final position provides the greatest benefits to government. It ensures that the department has access to essential *records* for almost all licence holders in as close to real time as possible, because *records* will be automatically submitted to the department when uploaded to the system. This option also provides greater benefits for the department for those that receive approval to continue use of the *hardcopy system*, as the provision of a *return of operations* still provides the department with more information and data than now.

Requiring all licence holders to use the *online system*, unless it would cause hardship, supports an enhanced and pro-active compliance approach in alignment with the department's *Regulatory Strategy*. It allows the department to more easily monitor the possession, *trade*, and *movement* of *protected animals* rather than relying on posted hardcopy *movement advices* and visiting licence holders to inspect *record books*.

There are also administrative advantages for government when *records* are received electronically. For example, it is expected that the vast majority of the 16,000 *movement advices* received annually would be replaced with electronic *records* under the final position. Receiving *records* electronically will reduce the time and effort in checking *records*, retrieving and reconciling the two (separately received) parts of *movement advices* for compliance purposes, and for the processing and storing of these *records* and *advices*.

The final position will also benefit government by increasing the safety of compliance officers when undertaking inspections, as staff will know what animals are at a premises to be inspected. For example, they will know if they will be dealing with two animals or 100 animals, or venomous or dangerous animals, before they arrive.

Costs

Where licence holders demonstrate hardship and continue to use the paper based *record-keeping* system, the volume of *records* received by the department will increase relative to the status quo. This is because all licence holders using the *hardcopy system* will be required to submit a *return of operations* summarising their *records*. This

new requirement will require resources to be directed towards managing these *records*, such as uploading these *records* to the *online system*, as the department currently does not receive such *records* from recreational licence holders.

Community and environment

Benefits

The final position benefits the community and environment by improving the ability of the department to monitor *trade of protected animals* relative to the current *hardcopy system*. It will improve the conservation of *protected animals* in the wild by reducing the ability to conceal *illegal trade*, whilst providing licence holders a simple and free *online system* to meet their *record-keeping* requirements.

Submitting *records* online may improve the quality of *record-keeping* for some licensees, and therefore reduce unintended non-compliance as a result of keeping *hardcopy records*. For example, if a *hardcopy record* entry is not in ink, or is illegible, the *record* is non-compliant under the current *record-keeping* framework. This approach also removes the need for licence holders to submit *hardcopy movement advices* for purchases and sales, as *online records* will replace these.

Costs

Under the final position, where the *hardcopy system* is used, the current *hardcopy record book* and *movement advices* will no longer be available to download from the department's website for free. They will need to be purchased from the department at the current fee,⁴ which is \$8.65 for a 20 page book or \$21.75 for a 50 page book, and \$3.80 per *movement advice*. These costs can be avoided by using the *online system*.

Issue 3 – Unregulated take of animals from the wild

Under the status quo, a person may *take* an unlimited number of protected scorpions and spiders from the wild, and up to eight least concern amphibians, without a permit. This has led to concerns around the effect of this *take* on the conservation of these animals.

The consultation RIS proposed removing the exemption on *taking* these animals for recreational permits, while continuing to allow the *take* of these animals under a commercial harvesting licence.

The final position limits *take* of protected scorpions and spiders and least concern amphibians from the wild to a person who is authorised under a wildlife harvesting licence, a collection authority, an educational permit, or a scientific purposes permit. However, in order to reduce the potential for transmitting the chytrid fungal disease to uninfected captive-bred populations, wildlife harvesting licences will not be issued for amphibians.

Where a person wants to *keep* a protected scorpion or spider or a least concern amphibian for personal *use* or for recreational or commercial *trading*, a *standard licence*, *specialised licence* or an *advanced licence* will be required, and they would also need to obtain the animal from captive-bred stock from an authorised provider.

Business and industry

Benefits

The final position maintains the ability to commercially harvest protected scorpions and spiders from the wild.

The recreational *take* of these animals from the wild will no longer be permitted, and harvest of these animals must occur under a wildlife harvesting licence. Consequently, it is likely there will be some economic benefit to business and industry. This is because a person seeking to *keep* these animals for a *recreational purpose* would be required to purchase an animal from a licenced business or person rather than collecting them from the wild. This will be of benefit to commercial operators who operate in this market as there will no longer be any competition from recreational *take* from the wild. It may also increase demand for animals collected by harvesters, in order to boost the captive-bred industry to account for demand previously satisfied by recreational *take* from the wild. The

restrictions on *taking* frogs may also reduce the risk of the chytrid fungal disease spreading into commercial captive-bred populations.

Whilst the final position will prohibit the commercial harvesting of least concern amphibians, there will be no impact on current businesses as there are currently no commercial harvesting licences issued for amphibians.

Costs

The final position may have an impact on any businesses that are contemplating seeking a commercial wildlife harvesting licence for amphibians. However, as there are currently no licences in effect, and none have been issued since the current Regulations came into effect in 2006, there is no measurable impact on business or industry.

Government

Benefits

Unregulated *take* for *recreational purposes* limits the department's ability to monitor the rate of species taken from the wild. This limits the department's capacity to ensure these animals are being appropriately dealt with when taken from the wild, and to identify if these animals are being funnelled into *illegal trade*.

The final position rectifies this by providing the government with the ability to regulate, and consequently monitor, harvesting. It will also reduce the accidental *take* of *threatened* frog species and disease risks for wild populations related to the *take* and release of potentially infected individuals. Further, by requiring a licence or permit to *take* and *keep* protected scorpions, spiders and least concern frogs, as is the case for all other *protected animals*, compliance efforts are expected to ease in relation to determining lawful and unlawful *take* of these species.

Costs

Where a person wants to *keep* a scorpion, spider or frog for personal use, a *standard licence* or *specialised licence* would be required. An *advanced licence* would be required for large-scale breeding and *trading*. The cost to the department for administering and undertaking compliance on these licences is covered by the proposed licence fees.

Community and environment

Benefits

The final position allows government to monitor species taken from the wild, minimise the risk of *illegal trade* and ensure protected populations remain viable in the wild. It may also reduce the risk associated with accidental *take* of *threatened* frog species, and the risk of spreading disease through the *take* and release of potentially infected individuals. The final position may also improve animal welfare outcomes for previously unregulated animals, as licence conditions require *keepers* to *keep* animals in a way that ensures the likelihood of escape, injury or ill-health of the animal is minimised, in accordance with the current code of practice. This allows for compliance actions to be taken in a targeted manner, and for enforcement avenues when *keeping* requirements are not being met, which should slowly improve animal welfare outcomes.

The final position will continue to allow the commercial harvesting of scorpions and spiders, as prohibiting commercial harvesting could facilitate unauthorised take. This could occur where current captive-bred stock cannot meet the public demand for these species, and may lead to shortages or price increases which could encourage *illegal trade* or unlawful *take* from the wild for recreational *keeping*.

Costs

Under the final position, in order to *keep* scorpions, spiders and frogs for *recreational purposes*, a *standard licence*, *specialised licence* or *advanced licence* will now be required depending on the number of animals kept. A *standard licence* costs \$59.20 and allows the *keeping* of a maximum of 10 animals. A *specialised licence* costs \$316.90 and allows the *keeping* of an unlimited number of scorpions and spiders and up to 50 amphibians if no other vertebrate animals (i.e. birds or reptiles) are kept. In order to *keep* more than 50 vertebrate animals, an *advanced licence* will be required, for a fee of \$682.90.

In addition to the licence cost, will be the cost of purchasing the animal. As the *taking* of these animals is currently unregulated and therefore unmonitored, the total cost to the community cannot be determined, but there is a risk that increased purchasing may drive up prices in the commercial sales market. However, the requirement to be licenced

to *keep* and *trade* these animals, means that this requirement now applies equitably to all persons *keeping* any *protected animal* for *recreational purposes*.

From an environmental perspective, allowing the commercial harvesting of protected scorpion and spiders will maintain the availability of captive-bred protected scorpions and spiders. If commercial harvesting was prohibited, there could be an increase in illegal activities, particularly if demand for certain species exceeded supply.

Achievement of policy objectives

The final position outlined in this Decision RIS has been identified as the most effective way to achieve the three main objectives of the review, while addressing stakeholder concerns, and preventing unnecessary regulatory impacts on licence holders.

The preferred policy position achieves this by:

- establishing a modern, risk-based licencing framework, which reduces the scope for a unregulated surrogate market, while reducing fees for ~90% of licence holders;
- strengthening *record*-keeping requirements, closing loopholes that allow licence holders to conceal *illegal trade* and providing a convenient *online system* for *record*-keeping; and
- restricting unregulated *take* of animals from the wild by shifting to a permit-based system for the *take* of protected scorpions and spiders and restricting the *take* of least concern amphibians.

The updated licencing framework will reduce the ability for large numbers of valuable animals to be kept, sold and *traded* with little to no monitoring or regulation. At the same time, in response to stakeholder feedback, the limits on the numbers of animals held under *standard* and *specialised licences* have been increased, and *trading* and breeding has been permitted (with restrictions). This should achieve the objectives of allowing compliance and monitoring of market, while minimising the impacts on licence holders. The new licencing framework is based on the activities undertaken, and is proportional to the level of fees. This allows the majority of licence holders to enjoy reduced fees, while the department can focus compliance efforts on the highest risk licence holders. This new framework is modern, effective and risk-based.

The shift to an online *record*-keeping system is supported by stakeholders, and is expected to make animal *keeping* life easier for the majority of licence holders, who will no longer have a requirement to mail *records* to the department. As many businesses and individuals will already use electronic systems to organise their *records*, this should be a simple transition to a modernised *record*-keeping system, leaving most licence holders better off. For those licence-holders who will genuinely suffer hardship, and/or are unable to transition away from a hardcopy *record*-keeping system, the ability to apply to continue using the current system should alleviate any unnecessary burden.

The removal of the exemptions around the *take* of protected spiders and scorpions, or least concern amphibians prevent unregulated *take* of these animals, which is consistent with the current regulatory approach for all other *protected animals*. This was supported by the majority of feedback on the Consultation RIS and by survey respondents. The *take* of these animals will still be allowed under a number of authorities. This should improve conservation outcomes for these animals.

Consistency with other policies and regulation

Competition Principles Agreement

The proposed legislative changes are consistent with clause 5 of the Competition Principles Agreement. The regulatory changes will not reduce competition for business and industry operating under the management framework for *protected animals*.

While some businesses may be subject to increased fees, the proposed fee increase will not compromise business viability or industry competition. By introducing a more contemporary regulatory framework, regulatory burden and

inefficiencies will be reduced, allowing a more equal and competitive environment for businesses *keeping, using* and *trading protected animals* in captivity, or dealing with *protected animals* in the wild.

Fundamental Legislative Principles

The fundamental legislative principles (FLP's) under the *Legislative Standards Act 1992* have been considered in this regulatory impact analysis. Breaches of FLP's have been avoided in the final position for reforming the regulation. Whilst the preferred approach to address the *record-keeping* requirements that facilitate *illegal trade* (Issue 2) may raise concerns about the maintenance of the rights and liberties of individuals, it does not breach this FLP.

The final position introduces a mandatory online *record-keeping* system for *standard, specialised* and *advanced licence* holders. *Standard licence* holders are permitted to *keep* animals that are also highly desirable from a *trading* perspective, such as the green python. *Specialised* and *advanced licence* holders are able to breed and *trade* both lower and higher risk animals from a *trading* perspective, with *advanced licence* holders having an unrestricted ability to breed and *trade*.

Requiring all licence holders to use an *online system* to keep and submit *records* is necessary to effectively monitor and reduce the *illegal trade of protected animals*. However, in order to meet the regulatory requirements for their licence this approach requires all licence holders to have access to an electronic device or computer and internet.

To ensure the regulation avoids inconsistencies with the maintenance of the rights and liberties of individuals, the final position allows a licence holder to apply to the department to use a hardcopy *record-keeping* system if hardship can be demonstrated. This ensures that licence holders who are not computer literate, or cannot access a device or computer, or the internet are not subject to an unnecessary burden in order to comply with their licence requirements.

Implementation, evaluation, and compliance support strategy

Implementation Strategy

The regulatory framework to support the management of *protected animals* in Queensland is proposed to commence by April 2020. Should the licencing framework change, all existing licence holders will continue to operate under their licence until it expires or they seek a new licence – whichever comes first. Consequently, it will *take* up to five years for some licence holders to transition into the new framework, depending upon when they received their licence.

In relation to *record-keeping* requirements of licence holders, unless hardship is demonstrated, all new licences will automatically operate under the department's online *record-keeping* system, while existing licence holders will have the choice to continue using hardcopy *record-keeping* or the current *online system*. However, an existing licence holder will be required to transition to the online *record-keeping* system upon renewal of licence.

Restricting recreational *take* of protected scorpions, spiders and amphibians will commence immediately after approval of the new regulation. Transitional provisions will be provided to allow a person to continue *keeping* animals that were lawfully taken prior to commencement of the new regulation. In these circumstances, the person will be able to *keep* the animal (but not sell or give away), for the life of the animal, or release the animal to where the animal was collected from.

The department has established an advisory committee with key sectoral representatives to assist in communicating implementation. Communication and education of the new licencing framework will occur over several months prior to commencement of the new regulations. This is in addition to advisory web material that will be published, including for example, on pages that provide advice about the department's licencing and permit framework for *keeping* and *trading protected animals*.

Evaluation Strategy

The proposed legislation will be reviewed within 10 years of commencement. The measures that will be used to evaluate improvements and the effectiveness of the framework, relative to the status quo, include:

- Effectiveness of new regulations in reducing government administrative burden, which may, for example, be measured by:
 - decrease in staff resources/time dedicated to assessing and issuing permits and licences for low-risk activities; and
 - increase in efficiency for staff to locate *records* and details for permit holders, and undertake compliance checks against *records*;
- Realisation of a cost-neutral approach to administration of the wildlife (animal) permit and licencing system as measured by:
 - the recovery of costs – which could be measured by comparing departmental assessment and compliance costs with licencing fee revenue;
- Effectiveness of the new permit and *recording* system in compliance monitoring and enforcement programs, which may, for example, be measured by:
 - development and implementation of a compliance and enforcement program that focusses on higher-risk activities;
 - increased efficiency for staff to locate and analyse *records* when investigating potential instances of non-compliance; and
 - detection of changed trends in *illegal trade* by the Queensland Government or law-enforcement bodies.
- Increased equitability in permit and licencing framework, which may, for example, be measured by:
 - the number of current *commercial wildlife licence* and *recreational wildlife licence* holders undertaking *trade* being subject to the same new permit type; and
 - consistency between Queensland and other states in species being permitted to be taken, kept, and *used*.

Compliance

Compliance, auditing and enforcement activities will be increased over the first 3 years following implementation of the final position, in order to heighten awareness of the new requirements. However, it is intended that the majority of activities undertaken in the first 6 months will be focussed on monitoring and auditing operations and issuing warnings as necessary, rather than issuing penalties. This will give business and community a grace period in which to adjust to the new framework, including transitioning existing licence holders under the new regulatory framework.

The overall level of compliance with the framework will be determined by:

- monitoring high risk licence holders in accordance with conditions of the relevant authority; and
- auditing *traders* and breeders to ensure adequate *records* are being maintained and *protected animals* are being purchased from authorised persons.

Glossary

- **Advanced licence:** A proposed licence allowing individuals and businesses to undertake larger scale *keeping* operations, providing them with a high level of access, breeding and *trading* ability for all class 1 and class 2 animals.
- **Commercial animal:** All protected scorpions and spiders and a category of protected birds and reptiles that can be kept in captivity under an appropriate authority. Commercial animals are listed under Schedule 4, part 3 of the Nature Conservation (Wildlife Management) Regulation 2006. Generally, commercial animals are those that are commonly kept and *traded*. A *commercial wildlife licence* or *recreational wildlife licence* is required to *keep* these animals.
- **Commercial protected animal services:** Includes commercial services such as conducting surveys of *protected animals*, removing and relocating *protected animals* (where the animal may cause damage or loss or represents a threat to human health or well-being), undertaking spotter catcher services during clearing and undertaking works associated with animal breeding places. These services are currently regulated under a Scientific Purposes Permit, a Damage Mitigation Permit, or a Rehabilitation Permit.
- **Commercial wildlife licence:** An authority issued under the Nature Conservation (Wildlife Management) Regulation 2006, allowing businesses to *keep* and *use* (buy and sell) *protected animals* for gain or reward, however restrictions apply.
- **Commercial purpose:** A person does an act for a *commercial purpose* if the act is for a gain or reward. For example, a person takes, *keeps* or *uses* *protected animals* for a *commercial purpose* if the activity is for a gain or reward, or the animal is *used* for is part of a business activity. A *commercial purpose* is described under section 6 of the Nature Conservation (Wildlife Management) Regulation 2006.
- **Exempt animal:** a *protected animal* that can be kept in captivity without an authority. These animals are listed in schedule 4, part 1 of the Nature Conservation (Wildlife Management) Regulation 2006.
- **Farm animal:** a farmed *protected animal* that is a venomous snake, birdwing butterfly, emu, estuarine crocodile, freshwater crocodile, Ulysses butterfly or water buffalo, that is wild by nature and is farmed, or has been lawfully taken from the wild or moved into the State, for *use* for farming.
- **Hardcopy system:** A paper-based system for *keeping records* under an authority.
- **High risk trade:** *Trade* in *protected animals* by licence holders who undertake larger scale *keep* and *trade* of *protected animals*, including *trade* for both *commercial purposes* and *recreational purposes* under the current framework. These are licence holders that are not subject to *trading* or breeding restrictions, including bird and reptile hobbyists and breeders and commercial *traders* that are likely to *keep* and *trade* a greater number and variety of species.
- **Illegal trade:** *Illegal trade* refers to activities where a *protected animal* is illegally poached from the wild and kept by a person or sold to other people. *Illegal trade* also includes the unauthorised buying, selling, receiving or giving away of *protected animals*.
- **International animal:** The green python and eclectus parrot are listed as international wildlife under Schedule 7 of the Nature Conservation (Wildlife) Regulation 2006, as these *protected animals* also have a natural range outside Australia.
- **Keep:** *Keeping* an animal involves having that animal in your possession or under your control, even if the animal is owned by somebody else.
- **Movement:** *Movement* of a *protected animal* from one place to another, or otherwise selling, disposing of, giving away, buying, accepting, and acquiring a *protected animal*.
- **Movement advice:** A *movement advice* is a form which *records* information about the *movement* of a *protected animal*, and notifies the department of the *movement*.
- **Movement permit:** A *movement permit* allows the department to authorise the *movement* of a *protected animal*, where the *movement* is otherwise not authorised. A licence holder must apply to the department to move an animal under a *movement advice*.
- **Native wildlife:** wildlife that is indigenous to Australia.
- **Nature Conservation Regulations:** A collective term for the subordinate legislation under the *Nature Conservation Act 1992*. Under this review the term *Nature Conservation Regulations* refers to the Nature

Conservation (Wildlife Management) Regulation 2006, the Nature Conservation (Administration) Regulation 2017, and the Nature Conservation (Wildlife) Regulation 2006.

- **Near threatened:** a *protected animal* that is listed as a *near threatened* under the Nature Conservation (Wildlife) Regulation 2006.
- **Online system:** An online *record-keeping* system where authority holders can use the internet to manage the administrative requirements of their licence including keeping *records* and completing *movement advices*.
- **Permit to keep wildlife:** an authority issued under the Nature Conservation (Wildlife Management) Regulation 2006 to allow a person to *keep* a *protected*, prohibited or *international animal* when there is no other wildlife authority that would be appropriate for allowing a person to *keep* the animal.
- **Protected animal:** an animal that is native to Australia and is prescribed under the *Nature Conservation Act 1992* as threatened, *near threatened*, or least concern.
- **Record(s):** A *record* of information related to a *protected animal*, kept in a *record book* or *online system*. For example, the date an animal was purchased, the type of animal that was purchased, and the name and licence details of the person the animal was purchased from.
- **Record book:** a *record book* supplied by the department, for the purpose of *keeping records* that must be kept under a wildlife authority.
- **Recreational animal:** A least concern amphibian or a category of protected birds and reptiles that can be kept in captivity. *Recreational animals* are listed under schedule 4, part 4 of the Nature Conservation (Wildlife Management) Regulation 2006. Generally these *protected animals* are not commonly kept or *traded* and can only be kept under a recreational licence.
- **Recreational wildlife licence:** An authority issued under the Nature Conservation (Wildlife Management) Regulation 2006, to allow a person to *keep* and *use* a protected or *international animal* for the person's own enjoyment. This authority allows a person to *keep*, *use*, move, buy, sell and breed protected or *international animals* for personal enjoyment, and as long as the activity is not considered a *commercial purpose* (i.e. gain or reward).
- **Recreational purpose:** Keeping or using an animal for a *recreational purpose* means a purpose other than a *commercial purpose*.
- **Regulatory Impact Statement:** The purpose of a *Regulatory Impact Statement* is to ensure regulatory best practice is met for the development, assessment and improvement of regulation. The purpose of a *Regulatory Impact Statement* is identify policy options to meet the objectives for addressing identified problems with regulations, and to assess the impacts (benefits and costs) of each of the policy options on business and industry, government and the community. *Regulatory Impact Statements* are developed against the Queensland Treasury guideline – 'The Queensland Government Guide to Better Regulation'.
- **Regulatory Strategy:** *Regulatory Strategy*, Department of Environment and Science, 2014. <http://www.ehp.qld.gov.au/management/planning-guidelines/policies/regulatory-strategy.html>
- **Restricted animal:** A *threatened* or *near threatened* amphibian or a category of restricted birds and reptiles that can be kept in captivity. *Restricted animals* are listed under Schedule 4, part 5 of the Nature Conservation (Wildlife Management) Regulation 2006. Generally, a *restricted animal* is a subclass of a '*recreational animal*' and applies to animals that usually require specialised *keeping* skills or considered dangerous to *keep*.
- **Return of operations:** A *return of operations* summarises *records* of authorised activities under a licence. Return of operation must be submitted to the department within particular timeframes.
- **Specialised licence:** a proposed licence allowing small-scale hobbyists to *keep* class 1 and class 2 *protected animals* exclusively for the purpose of personal enjoyment.
- **Standard licence:** a proposed licence allowing small-scale hobbyists to *keep* class 1 *protected animals* exclusively for the purpose of personal enjoyment.
- **Take(ing):** *Taking* an animal involves removing the animal from the wild. This includes undertaking, or attempting to undertake hunting, shooting, wounding, killing, poisoning, netting, snaring, spearing, trapping, catching, dredging for, bringing ashore or aboard a boat, pursuing, luring, injuring or harming the animal.
- **Trade/Trading:** includes the *movement* of a *protected animal* from one place to another, or otherwise selling, disposing of, giving away, buying, accepting, and acquiring a *protected animal*.
- **Use/Using:** Use of an animal involves moving, buying, selling, giving away, or processing the animal, or gaining any benefit from the animal.
- **Threatened:** a *protected animal* that is listed as an endangered or vulnerable animal under the Nature Conservation (Wildlife) Regulation 2006.

- **Wildlife farming licence:** an authority issued under the Nature Conservation (Wildlife Management) Regulation 2006 to allow a person to farm an animal listed as a *farm animal*

Attachment 1: Consultation process

Notification of consultation

Website

Information about the regulation review has been available on the [Queensland Government portal](#) since mid-2016, when the first discussion paper in relation to the review was released for comment. On 24 May 2018 this page was updated to reflect opening of the consultation period on the Consultation RIS.

The webpage provided a link to the Consultation RIS, a summary of the review's focus, a summary of the proposed preferred option, frequently asked questions, and information on how to make a submission. As part of this submission process the webpage provided a link to a survey hosted by Survey Monkey. In addition to general survey questions about the proposed options, a number of specific questions were provided to assist the department to better understand how options may affect current licence holders.

On Thursday 24 May 2018 information about the consultation process was also posted on the Queensland Government ['get involved'](#) page. This page provided an invitation for people to provide comment on the review and redirected users to the above-mentioned page on the Queensland Government Portal.

Email

In order to reach as many potentially impacted stakeholders as possible, within the constraints of the Conservation and Biodiversity Policy budget, a 'vision 6' email was sent to commercial and recreational licence holders who had provided the department with an email address. This information was obtained for licences issued under the superseded 'EcoTrack' system and for licences issued under the new 'Connect' system. An exception to this data collation was those licence holders registered on the new 'Connect' system who had opted that their email address not be used for correspondence.

The email was also sent to 35 people and organisations who made a submission on the discussion paper released in July 2016.

Overall, the consultation email was sent to 30,113 people on 24 May 2018. By the close of consultation at 5pm on 29 June 2018, 44.63% of the emails sent had been opened (13,440), and 4.08% (1,230) of recipients had clicked on the link to the Queensland Government portal page about the review.

Undeliverable and redirected emails

Of these 30,113 emails, approximately 6% (1,806) were undeliverable, and the department received 54 replies with automated 'out of office' responses. Of those 54 automated replies, 39 indicated that the licence holder is no longer contactable at that address and forwarding details were not provided (e.g. it was a corporate email address where they no longer work). However, five indicated new contact details for the licence holder, which were used to forward the original email.

Some delivered emails however did not reach the intended recipients. In consultation feedback a number of licensees indicated that they had not received the email. On investigation, it was identified that some email addresses *recorded* in the department's system were incorrectly entered either by the licensee or departmental officers, and that some were outdated as the licensee had not updated their contact details with the department. These licensees were advised as to how they could rectify this.

Social media

A post about the review was added the Queensland Department of Environment Facebook page on 24 May 2018. This post was 'boosted' on 14 June with the intent to encourage greater public feedback on the proposals. Overall, this post reached 38,652 people. Of those, 686 people clicked on the link to the Queensland Government portal page about the review, and 475 people reacted to, commented on, or shared the post.

A second 'boosted' post was posted on 26 June 2018 reminding people of the final days for consultation on the regulation review. This accompanied a departmental media release on the same day. This post reached 19,786

people. Of those, 94 people clicked on the link to the Queensland Government portal page about the review, and 784 people reacted to, commented on, or shared the post.

Media release

A [departmental media release](#) was published on Tuesday 26 June 2018 reminding people of the opportunity to have their say.

Letters of submission

Including late submissions, the department received submissions from 96 submitters. These figures do not include survey responses, which are identified below.

Electronic submissions to the department

Ninety-five submitters provided their submissions electronically to the NC.Act@des.qld.gov.au inbox as per the consultation details on the Queensland Government Portal website. Fourteen of these electronic submitters provided multiple emails to the department – the details of which were combined and treated as a consolidated submission. One further submission was received by the department in October 2018, for a total of 96 submissions. An attempt was made to submit it electronically to the department during the consultation period, but with the wrong contact details. It was accepted as a submission.

Emails not treated as submissions

Emails received by the department querying the potential application of the proposed options to a person's particular circumstance, or requesting information related to their current licence, were not treated as submissions. However, when responding to these people, the department encouraged the making of a submission.

Hardcopy submissions to the department

Of the submissions received, two were mailed to the department as per the consultation details on the Queensland Government Portal website. Of these hardcopy submissions, both were duplicated by an electronic submission.

Late submissions

Three organisations provided their submission past their extended deadline of 5pm 13 July 2018, however these were still accepted as formal submissions.

Other submissions

The department received two letters and emails that had been sent directly to members of Parliament regarding the review, and which were forwarded to the department. These were *recorded* as formal submissions.

A further eight submitters provided a submission to the department and to members of Parliament. Where the submission to the department and the Member of Parliament varied in detail, both items of correspondence were combined as a consolidated submission for that person.

Survey responses

The department received 869 survey responses upon closure of the survey at 5pm 29 June 2018. As the surveys were submitted anonymously the department cannot determine if people submitting a survey response also submitted an email or hardcopy submission. It is also possible, particularly as a number of IP addresses were used several times, that individuals submitted multiple survey responses. However, all responses were considered as valid submissions.

Consultation meetings

During and following the consultation period the department held meetings with:

- the Wildlife Advisory Committee, whose membership is comprised of the:
 - Queensland Museum

- Pet industry Association of Australia
- Environmental Institute of Australia and New Zealand (EIANZ)
- Queensland Council of Bird Societies
- Australian Herpetological Society (replaced by Queensland Fauna Lobbyists during the consultation period)
- Wildlife Preservation Society of Queensland
- Queensland Wildlife Rehabilitation Council
- RSPCA Queensland
- Queensland Conservation Council
- the Australasian Arachnological Society
- PetCity pet shop
- the Burnett Bird Keepers Association
- Queensland Finch Society
- Canary and Cage Bird Federation of Australia

In addition to detailed discussions with the Wildlife Advisory Committee, detailed workshops in relation to the proposed species listings, and refinement of the license options were also held with the:

- Queensland Council of Bird Societies
- Queensland Finch Society
- Queensland Fauna Lobbyists

Attachment 2: Feedback from letters of submission

This section details the themes raised in the letters of submission received by the department.

Licence framework (restrictions and limits)

Of the 96 submissions received, 62 (64.6%) addressed the proposed licence framework and maximum animal limit. Of these submissions:

- one (1.6%) recommended status quo should remain for the licencing framework as this will have the least impact for people *keeping* birds;
- seven (11.3%) agreed with the proposed licencing framework, subject to amendments to proposed limits and breeding restrictions, but some provided no further suggestions on what a suitable limit may be;
- 14 (22.6%) believed the breeding and *trading* restriction and animal limits for standard and specialised under proposed licencing framework would promote further *illegal trade*;
- three (4.8%) disagreed with the proposed licencing framework but provided no additional information as to why; and
- 37 (59.7%) disagreed with the proposed licencing framework because they believed the proposed breeding and *trading* restrictions, and proposed animal limits under a standard and *specialised licence* would have a negative impact. For example, they disagreed with the need to reduce the number of animals kept in their private collections in order to avoid a higher licence fee.

Of these 62 submissions, 13 suggested an alternative maximum limit for the number of animals permitted under a standard or *specialised licence*:

- four (30.8%) people suggested a number from 1-10;
- three (23.1%) people suggested a number from 11-20;
- four (30.8%) people suggested a number from 21-50;
- one (7.7%) person suggested a maximum number of 100; and
- one (7.7%) person suggested that these licences should allow the *keep* of an unlimited number of animals.

Species classification for keeping native animals

Of the 96 submissions received, 43 (44.8%) raised concerns with the proposed species lists relevant to the native animal *keeping* industry.

Forty (93%) of these submissions requested general changes to the species makeup of the proposed exempt, class 1, class 2, and prohibited lists, and wanted the classes to be further reviewed by the department. Twelve of these 40 submissions (30%) provided no further detail. Of the submissions which provided feedback on the review:

- 13 (32.5%) people requested the department to reconsider species on the prohibited list;
- 13 (32.5%) people suggested that the proposed classes of birds, reptiles and amphibians be better aligned with New South Wales' *keeping* lists; and
- two (5%) people wanted the department to allow mammals to be kept as pets.

In addition, five submissions raised concerns that commercial licence holders would not be able to meet welfare standards and provide appropriate husbandry requirements for *keeping* Class 2 animals.

Proposed fees

Of the 96 submissions received, 49 (51%) raised concerns about the fees for the proposed new licence types. The majority (71%) of these submissions stated that the fees were excessive for recreational *keepers*, particularly given that many people who consider themselves pet *keepers* or hobbyists *keep* and breed more animals than provided for under the proposed preferred option for the standard and *specialised licences*.

In addition, three submissions stated that the fees were appropriate for each licence type, but that they would like the department to review animal limits and breeding restrictions. A further two submissions raised concerns that

that the fees were not enough, and that the department should increase fees to better resource compliance activities. One submission proposed new fees.

Record-keeping

Of the 96 submissions received, 47 (48.95%) submitters provided comments in relation to the proposed approach to *record-keeping*.

Of the 47 submissions, 23 (49%) supported the proposed approach to implementing an electronic *record-keeping* system. Of these 23 submitters:

- 21 (91.3%) supported transitioning the *record-keeping* framework to a fully integrated electronic model; and
- two (8.7%) recommended hard copy *record-keeping* remain an option under the proposed framework.

Thirteen of the 47 submitters (27.6%) did not support the proposed online *record-keeping* system. Instead, they sought continuation of the current *hardcopy system* - particularly for licence holders who do not have ready access to a computer or the internet, and others who feel they don't have the technological skills and knowledge to navigate an *online system*.

The remaining 11 (23.4%) commenting submitters identified their general dissatisfaction with the current *record-keeping* framework, however did not identify if they supported moving to an electronic *record* system.

Unregulated take of animals from the wild

Of the 96 submissions received, 10 (10.4%) raised concerns about the unregulated *take* of amphibians and protected scorpions and spiders. The majority (80%) of these submissions supported the department's proposal to only allow the *take* of these species under an authority.

Administrative Amendments

Eight submitters (8.3%) provided feedback in relation to the proposed administrative amendments. Despite all eight generally supporting the overall proposed administrative amendments:

- 5 submitters specifically indicated they did not support the removal of Damage Mitigation Permits for airport authorities. The primary concern was airport authorities using lethal mitigation methods as the first option under the proposed approach rather than the last option under the current framework; and
- 2 submitters did not support the proposed administrative amendments on the basis the proposed changes will not streamline the framework or reduce regulatory burden.

General

Of the 96 people who provided written submissions, 62 (64.6%) addressed general matters in their submission that were within the scope of the review, but could not be classed into one of the above categories.

The general matters that people raised were:

- eight (13%) people raised concerns over the length of the consultation period;
- eight (13%) people raised concerns over the method that was used to consult (email);
- five (8%) people described the value in *keeping native wildlife* as a means of combating anxiety and fears;
- two (3.2%) people described the value in amateurs *keeping native wildlife* before becoming experts in that field;
- one (1.6%) person described the research value contributed by recreational wildlife holders;
- two (3.2%) people requested resources be directed to more rangers in the field;
- two (3.2%) people requested more of a departmental presence at club meetings and sale events;
- three (5%) people raised that there should be more requirements to meet before being issued with a permit;
- two (3.2%) people raised concerns over the current *online system*, 'Connect';
- two (3.2%) people requested a system that notifies the licence holder when their licence is due for renewal;

- one (1.6%) person requested that reptiles and birds be licenced separately due to varying husbandry, breeding and welfare requirements; and
- one (1.6%) person raised concerns about *recreational wildlife licence* holders being linked with illegal wildlife *trade*.

The remaining submissions in this category provided background information, such as their history in *keeping native wildlife*.

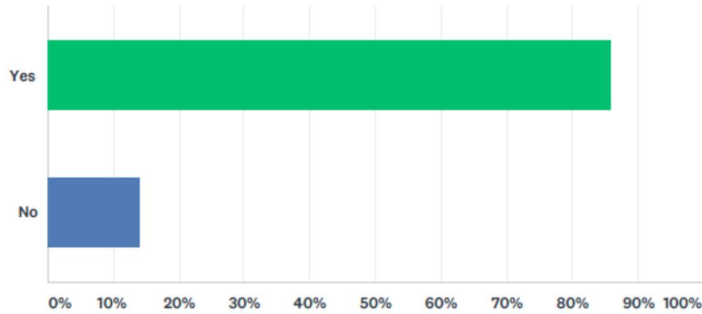
Out of Scope

Nineteen submissions (19.8%) also contained information that was not within the scope of the RIS. Of these, four submissions provided feedback in relation to issues to be addressed through a separate review process. These include rehabilitation permits and licencing of spot and catch activities. The remaining submissions included organisational profiles, information consultation processes conducted by New South Wales Government, and information about land clearing rates in New South Wales and Queensland.

Attachment 3: Survey questions and the multiple-choice responses

Q1 Do you think that the Queensland Government should do more to prevent illegal wildlife trade?

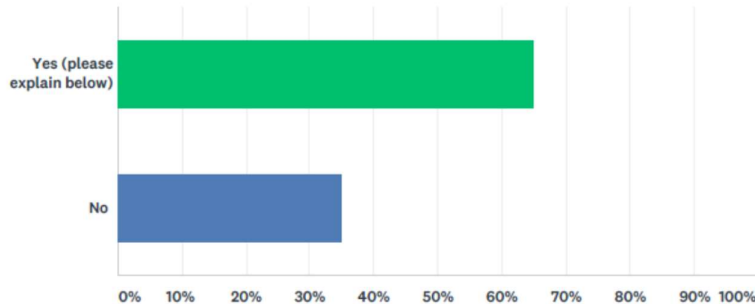
Answered: 868 Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes	85.94%	746
No	14.06%	122
TOTAL		868

Q2 Currently recreational wildlife holders can keep more species of native wildlife than commercial wildlife licence holders. Should this be allowed to continue?

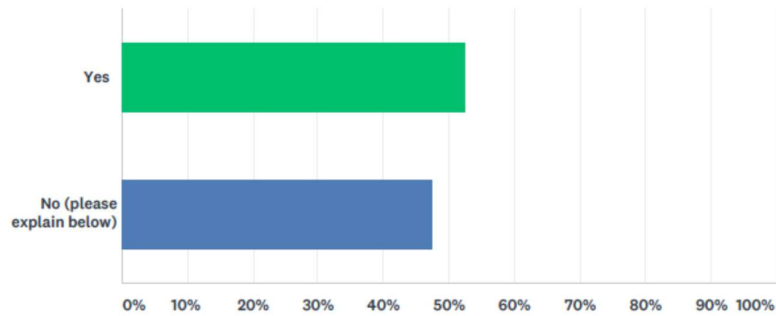
Answered: 868 Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes (please explain below)	65.09%	565
No	34.91%	303
TOTAL		868

Q3 Attachment 2 of the Regulatory Impact Statement outlines the proposed lists for 'class 1' and 'class 2' species. Do you agree that species are in the correct class?

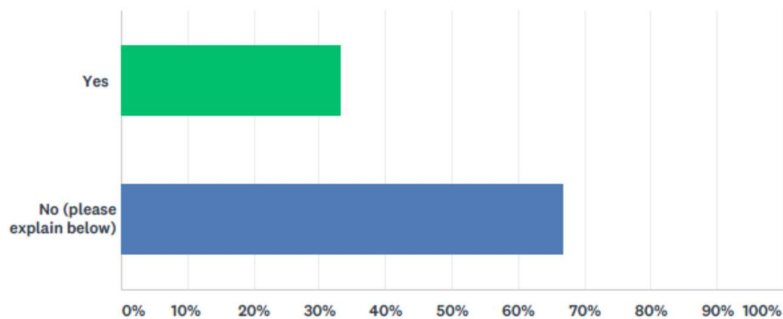
Answered: 868 Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes	52.53%	456
No (please explain below)	47.47%	412
TOTAL		868

Q4 Do you think is it reasonable to adopt a licencing approach that focuses on the number of animals a person is keeping?

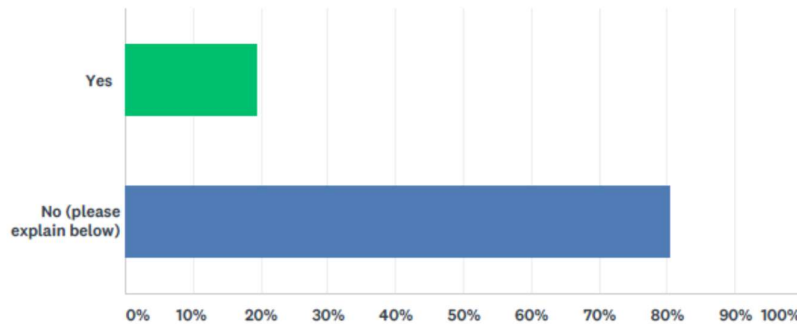
Answered: 868 Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes	33.18%	288
No (please explain below)	66.82%	580
TOTAL		868

Q5 Do you think that a limit of five native animals is reasonable for a standard licence and specialised licence?

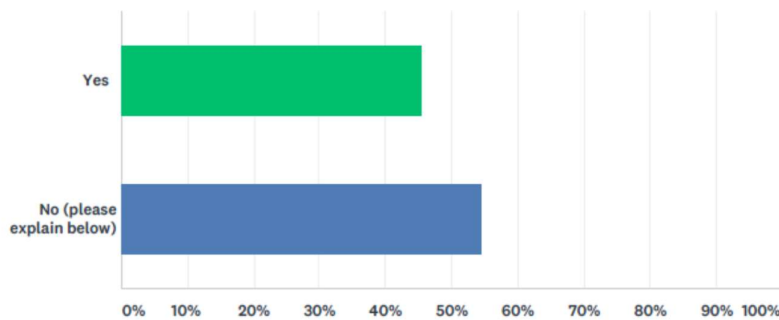
Answered: 868 Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes	19.35%	168
No (please explain below)	80.65%	700
TOTAL		868

Q6 With an increased popularity for keeping native animals as pets, the breeding of native animals has increased to meet demand. Do you think is it reasonable to adopt a licencing approach that focuses on whether a person is breeding their animals?

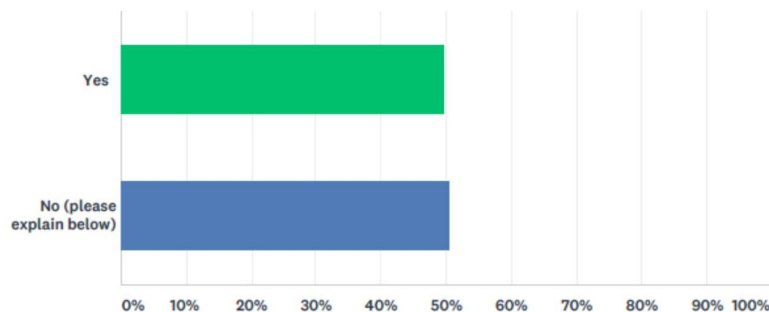
Answered: 868 Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes	45.39%	394
No (please explain below)	54.61%	474
TOTAL		868

Q7 Do you think is it reasonable to adopt a licencing approach that focuses on whether a person is trading their animals?

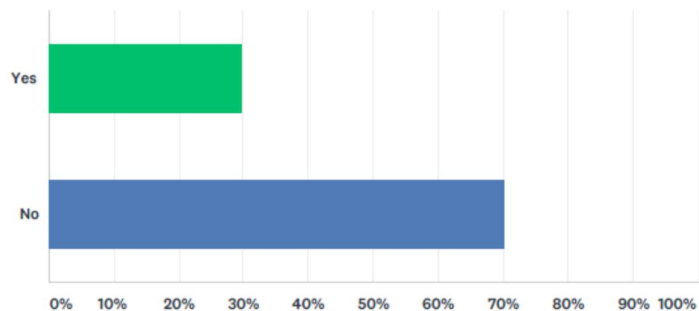
Answered: 868 Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes	49.65%	431
No (please explain below)	50.35%	437
TOTAL		868

Q8 Currently people can take scorpions, spiders, and amphibians from the wild for a recreational purpose without needing a licence. Should this be allowed to continue?

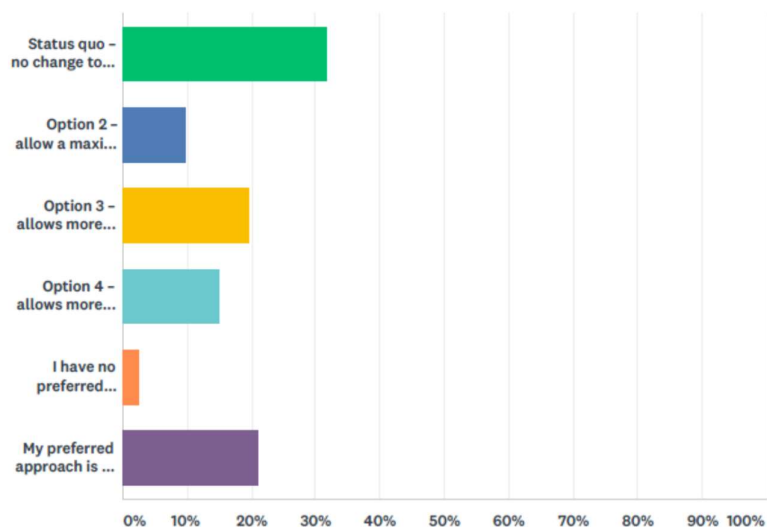
Answered: 868 Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes	29.61%	257
No	70.39%	611
TOTAL		868

Q9 In considering the options proposed, which wildlife framework option do you prefer?

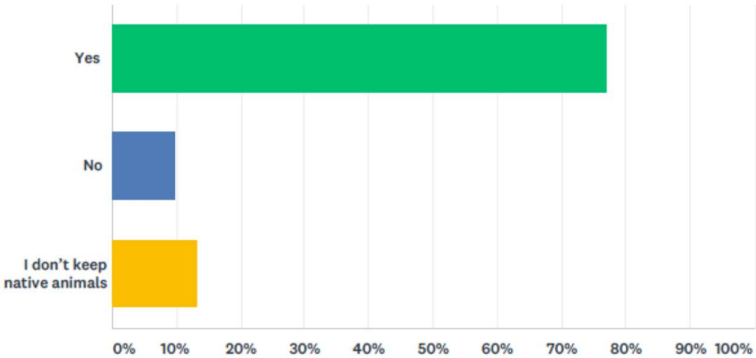
Answered: 849 Skipped: 20



ANSWER CHOICES	RESPONSES	
Status quo – no change to the wildlife framework	31.80%	270
Option 2 – allow a maximum of five native animals under a standard or specialised licence (preferred option);	9.78%	83
Option 3 – allows more than five native animals under a standard or specialised licence; and	19.67%	167
Option 4 – allows more than five 'class 1' animals under a standard or specialised licence, but no more than five 'class 2' animals under a specialised licence	15.08%	128
I have no preferred approach	2.47%	21
My preferred approach is not identified (please specify)	21.20%	180
TOTAL		849

Q10 If you currently keep native wildlife, we would appreciate further information from you. Are you willing to answer more detailed questions about your licence and the animals you keep?

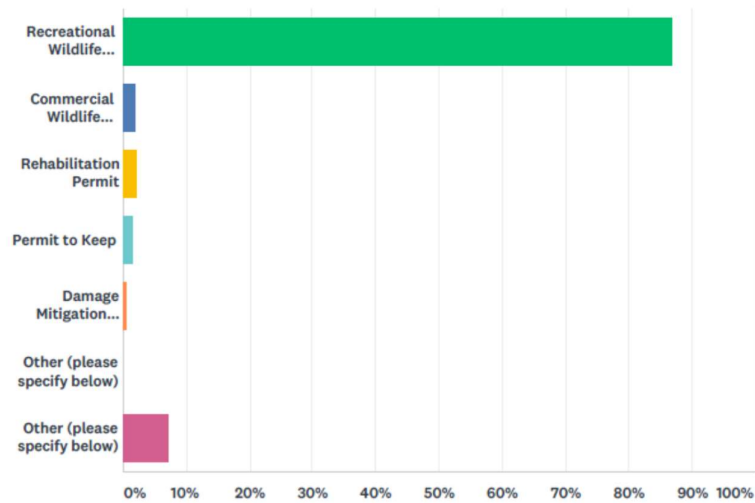
Answered: 844 Skipped: 25



ANSWER CHOICES	RESPONSES	
Yes	77.01%	650
No	9.83%	83
I don't keep native animals	13.15%	111
TOTAL		844

Q11 What licence or permit do you currently hold? If you hold more than one licence and one of them is a Recreational or Commercial Wildlife Licence please choose that option.

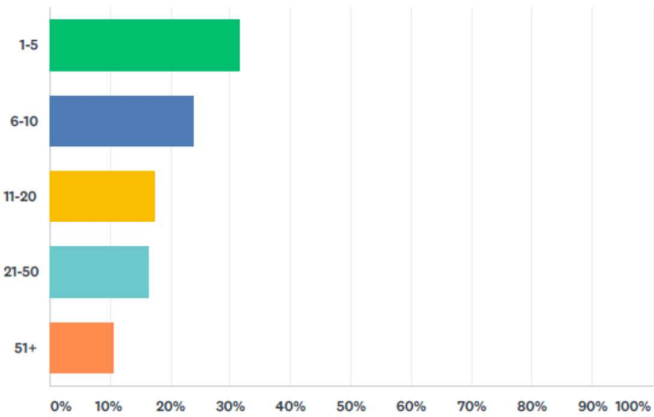
Answered: 645 Skipped: 224



ANSWER CHOICES	RESPONSES	
Recreational Wildlife Licence	86.82%	560
Commercial Wildlife Licence	1.86%	12
Rehabilitation Permit	2.17%	14
Permit to Keep	1.40%	9
Damage Mitigation Permit	0.62%	4
Other (please specify below)	0.00%	0
Other (please specify below)	7.13%	46
TOTAL		645

Q12 How many animals do you keep under your licence?

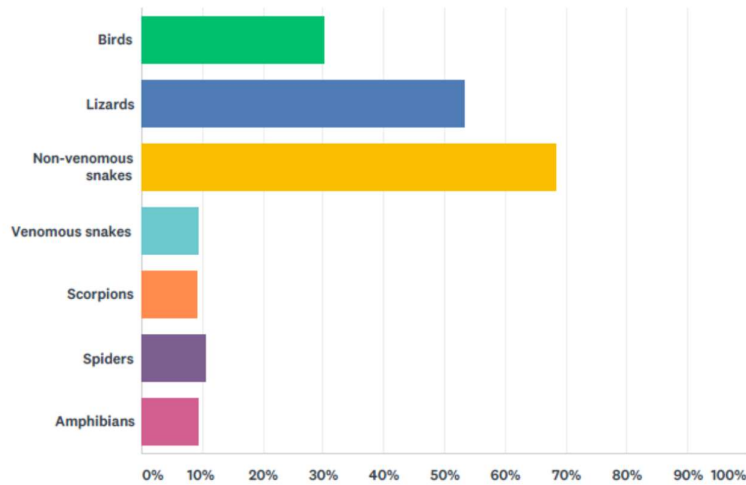
Answered: 568 Skipped: 301



ANSWER CHOICES	RESPONSES	
1-5	31.51%	179
6-10	23.77%	135
11-20	17.43%	99
21-50	16.55%	94
51+	10.74%	61
TOTAL		568

Q13 What types of animals do you keep under your licence (select more than one if applicable)?

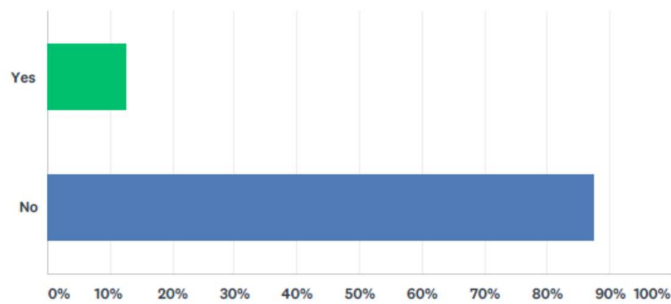
Answered: 568 Skipped: 301



ANSWER CHOICES	RESPONSES	
Birds	30.11%	171
Lizards	53.35%	303
Non-venomous snakes	68.31%	388
Venomous snakes	9.51%	54
Scorpions	9.15%	52
Spiders	10.74%	61
Amphibians	9.33%	53
Total Respondents: 568		

Q14 Do you only keep eclectic parrots or green pythons under your licence?

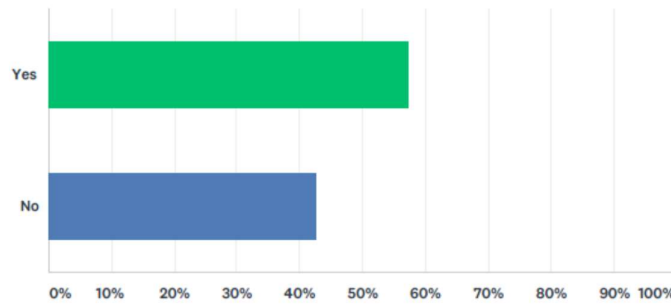
Answered: 570 Skipped: 299



ANSWER CHOICES	RESPONSES	
Yes	12.46%	71
No	87.54%	499
TOTAL		570

Q15 Do you keep any animals for breeding purposes?

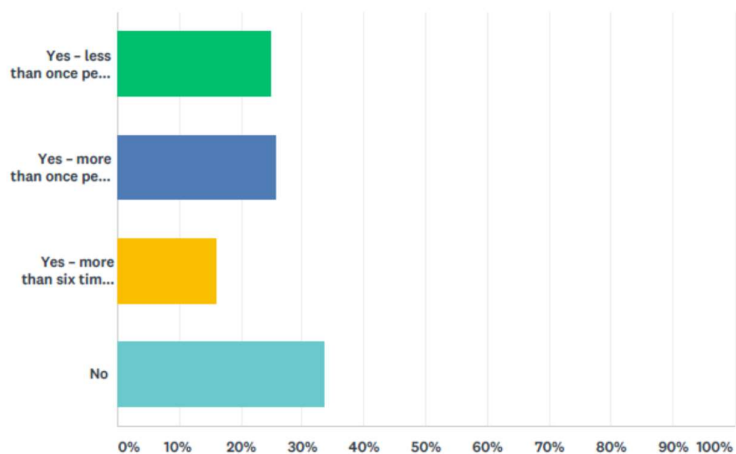
Answered: 570 Skipped: 299



ANSWER CHOICES	RESPONSES	
Yes	57.37%	327
No	42.63%	243
TOTAL		570

Q16 Do you trade animals with recreational wildlife licence holders?

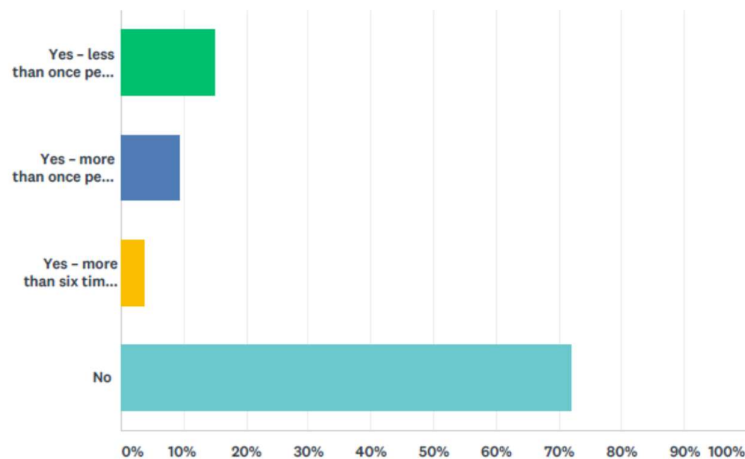
Answered: 568 Skipped: 301



ANSWER CHOICES	RESPONSES	
Yes - less than once per year	24.82%	141
Yes - more than once per year but less than six times a year	25.70%	146
Yes - more than six times a year	16.02%	91
No	33.45%	190
TOTAL		568

Q17 Do you trade animals with commercial wildlife licence holders?

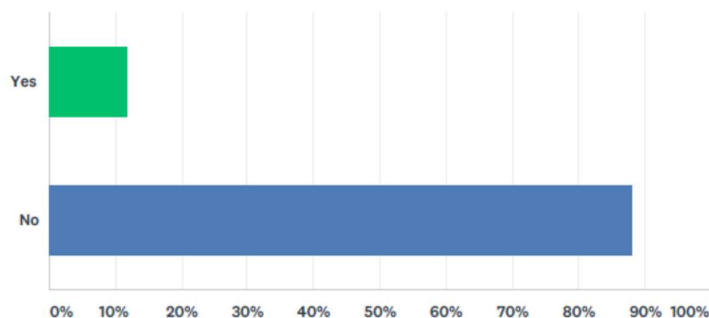
Answered: 569 Skipped: 300



ANSWER CHOICES	RESPONSES	
Yes – less than once per year	15.11%	86
Yes – more than once per year but less than six times a year	9.31%	53
Yes – more than six times a year	3.69%	21
No	71.88%	409
TOTAL		569

Q18 Under the proposed species lists (see Attachment 2 of the RIS), it is proposed that some bird species will become 'exempt' animals, and thus not require a licence to keep. Will this mean that you no longer require a licence?

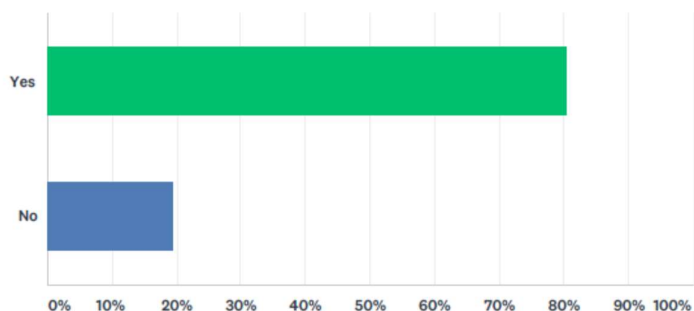
Answered: 569 Skipped: 300



ANSWER CHOICES	RESPONSES	
Yes	11.95%	68
No	88.05%	501
TOTAL		569

Q19 If you wish to continue with your animal keeping practices, under the proposed licence framework, will you require a more expensive licence?

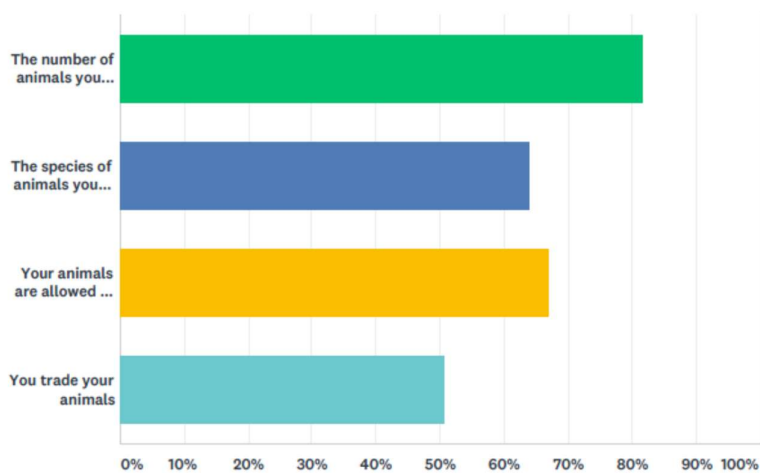
Answered: 566 Skipped: 303



ANSWER CHOICES	RESPONSES	
Yes	80.57%	456
No	19.43%	110
TOTAL		566

Q20 Please identify which of the following, select all that apply, would result in you requiring a more expensive licence.

Answered: 535 Skipped: 334



ANSWER CHOICES	RESPONSES	
The number of animals you have	81.68%	437
The species of animals you have	63.93%	342
Your animals are allowed to breed	66.92%	358
You trade your animals	50.65%	271
Total Respondents: 535		

Attachment 4: Feedback from survey responses

This section details the feedback received through the consultation survey. The survey provided twenty multiple-choice questions and survey respondents could choose which questions they would like to answer. The first nine questions were designed to identify the public's response to the assumptions and proposals presented in the Consultation RIS. The remaining questions were designed to assist the department to better understand the current wildlife *keeping* market, and how the consultation proposals may affect individuals. Attachment 1 provides a copy of the questions and the multiple-choice responses. This section further explains the purpose of each question and the responses received, including any free-text detail included with responses.

Question 1: Do you think that the Queensland Government should do more to prevent illegal wildlife trade?

The purpose of this question was to identify whether members of the public agreed that the Queensland Government should do more to prevent illegal wildlife *trade*.

Of the 869 total respondents to the survey, 868 responded to this question. Of these, 746 (85.9%) agreed that the Queensland Government should do more and 122 (14.1%) did not agree that the Queensland Government should do more to prevent illegal wildlife *trade*.

Question 2: Currently recreational wildlife holders can keep more species of native wildlife than commercial wildlife licence holders. Should this be allowed to continue?

The purpose of this question was to identify whether members of the public agreed if *recreational wildlife licence* holders should continue to have access to more species than *commercial wildlife licence* holders.

Of the 869 total respondents to the survey, 868 responded to this question. Of these, 565 (65.1%) thought that this should be allowed to continue, and 303 (34.9%) thought that this should not continue.

However, of those 565 that thought recreational licence holders should continue to *keep* more species:

- 74 (13%) respondents agreed that commercial licence holders should be able to *keep* more species than currently allowed; and
- 174 (31%) respondents were concerned that commercial licence holders would not be able to meet welfare standards and provide appropriate husbandry requirements for an expanded range of species.

Of the 303 respondents that did not want recreational licence holders to continue to keep more species than commercial licence holders, all suggested that commercial licence holders should have access to the same species currently kept recreationally.

Question 3: Attachment 2 of the Regulatory Impact Statement outlines the proposed lists for 'class 1' and 'class 2' species. Do you agree that species are in the correct class?

The purpose of this question was to identify whether members of the public agreed that species relevant to the native animal *keeping* industry have been classed correctly under the proposed class 1 and class 2 species lists.

Of the 869 total respondents to the survey, 868 responded to the question. Of these, 456 (52.5%) thought that species were in correct classes, and 412 (47.5%) thought that species were not in the correct class.

Of those that thought the classes were correct and reflective of the wildlife *keeping* industry, eight respondents suggested that some minor changes should be made to the makeup of species under the various classes.

Of those that thought the classes were incorrect and not reflective of the wildlife *keeping* industry, 261 provided comments relevant to the question. These comments identified that respondents did not agree with the species makeup of the proposed 'Exempt', 'Class 1' and 'Class 2' lists, and wanted the classes to be further reviewed by the department. More specifically:

- seven respondents wanted native mammals to be added to the *keeping* list similar to other states such as Victoria and New South Wales; and
- four respondents wanted the proposed classes of birds, reptiles and amphibians to be better aligned with New South Wales' *keeping* lists.

In addition, 28 respondents did not agree with the proposed 'prohibited' list of species. Comments generally requested removal of this list, or requested the reclassification of certain species that are currently kept by licence holders out of the proposed prohibited list and into the 'class 1' or 'class 2' list.

Eight respondents suggested that dangerous/venomous snakes should be in a separate class to all other species.

Question 4: Do you think it is reasonable to adopt a licencing approach that focusses on the number of animals a person is keeping?

The purpose of this question was to identify whether members of the public agreed with the assumption that it is reasonable to apply a limit on the numbers of animals to be kept.

Of the 869 total respondents to the survey, 868 responded to this question. Of these, 288 (33.2%) thought it was reasonable and 580 (66.8%) thought it was not reasonable. However, of those who thought that setting limits would be reasonable, 19 commented that the consulted preferred option was too restrictive.

Of those opposed to setting limits on licences, 530 provided comment. From these comments:

- 287 respondents did not support any limits on numbers for licences. Generally, they believed that this should be up to the skills and discretion of the licence holder; and
- 211 respondents opposed limits in the context of the limits under the proposed preferred option. The department cannot determine whether these respondents would have a differing view if they were answering without having regard to the proposed preferred option, but 23 of these responses suggested that a differing limit may be acceptable.

The remaining 32 comments were not directly relevant to the question.

Question 5: Do you think that a limit of five native animals is reasonable for a standard licence and specialised licence?

The purpose of this question was to identify whether members of the public agreed with the proposed limit of five native animals for a standard and *specialised licence*.

Of the 869 total respondents to the survey, 868 responded to this question. Of these, 168 (19.4%) thought that the limit was reasonable, and 700 (80.6%) thought it was not reasonable. The department did not analyse for correlations between individuals' responses for questions four and five.

Of the 868 respondents to the question, 650 (75%) provided comment on this question.

Although 700 respondents answered that they did not find the limit reasonable, comments from some respondents suggested that they found the limit reasonable for either the standard or *specialised licence*, but not both. By using these comments, the adjusted figures for this question are 194 (22.4%) respondents thought the proposed limit was reasonable for the *standard licence*, and 172 (19.8%) respondents thought the proposed limit was reasonable for the *specialised licence*.

Of the 650 comments provided, 189 (28.8%) contained either a suggestion for an alternative limit, or stated how many animals they currently *keep* – 94 (49.7%) of these comments were relevant to *standard licences* and 95 (50.3%) were relevant to *specialised licences*. Based on these results, of the 94 submitters commenting relevant to *standard licences*:

- 37 (39.4%) respondents would find a limit of 10 reasonable;
- 15 (16.0%) would find a limit of 15 reasonable;
- 23 (24.5%) would find limit of 20 reasonable; and
- 19 (20.2%) would find a limit of 50 or more reasonable.

For the *specialised licence*, of the 95 submitters commenting:

- 34 (35.8%) would find a limit of 10 reasonable;
- 16 (16.8%) would find a limit of 20 reasonable;
- 23 (24.2%) would find a limit of 50 reasonable; and
- 22 (23.2%) would find a limit of 50 or more reasonable.

Question 6: With an increased popularity for keeping native animals as pets, the breeding of native animals has increased to meet demand. Do you think it is reasonable to adopt a licencing approach that focuses on whether a person is breeding their animals?

The purpose of this question was to identify whether members of the public agreed if it is reasonable to adopt a licencing approach that focuses on whether a person is breeding their animals.

Of the 869 total respondents to the survey, 868 responded to the question. Of these, 394 (45.4%) thought it was reasonable, and 474 (54.6%) thought it was not reasonable.

Of those who thought it was reasonable to adopt this licencing approach, 80% did not provide any further comment. The remaining 20%, while agreeing with the approach, expressed that the proposed maximum animal limit for standard and *specialised licence* should be reviewed and increased to capture common *keep* numbers in the reptile and bird industries. It was also recommended that a breeder's register is established in conjunction with a functioning online *record*-keeping system to complement the proposed approach.

Of those opposed to adopting a licencing approach that focuses on whether a person is breeding their animals, 419 (88.4%) provided comment. From these comments:

- 122 (29%) identified that the proposed licencing approach was a direct imposition on their right to breed their animals as a current *recreational wildlife licence* holder. It was suggested that the framework remain unchanged to allow hobbyists to continue to breed their animals without restrictions;
- four (1%) believed that a better *record*-keeping system would be more beneficial than the proposed licencing approach;
- ten (2.4%) identified as bird breeders and would be forced to apply for a higher fee licence for non-exempt species;
- 26 (6.2%) identified the animal limit would prevent them from breeding within their private collections;
- 21 (5%) specifically noted they did not support the proposed approach;
- 32 (7.6%) identified that the licencing approach should focus on if a person is breeding recreationally or commercially; and
- 204 (48.7%) provided no additional information other than expressing their lack of support for the proposal.

Question 7: Do you think it is reasonable to adopt a licencing approach that focuses on whether a person is trading their animals?

The purpose of this question was to identify whether members of the public agreed if it is reasonable to adopt a licencing approach that focuses on whether a person is *trading* their animals.

Of the 869 total respondents to the survey, 868 responded to the question. Of these, 431 (49.7%) thought it was reasonable, and 437 (50.4%) thought it was not reasonable.

Of those who thought it would be reasonable, 12 (2.8%) commented that the current preferred option is insufficient.

Of the 437 respondents that identified they did not consider it reasonable, 48 (11%) identified in their comments that they thought focusing on *trading* was reasonable, so long as the proposed restrictions are revised and hobby-level *trade* was allowed under the standard and *specialised licences*.

By using these comments, the adjusted figures for this question are – 479 (55.2%) respondents find it reasonable to focus on *trade*, and 389 (44.8%) respondents think it is unreasonable to focus on *trade*.

Of those respondents who did not agree with a focus on *trade*, 57 (6.6%) respondents interpreted from the Consultation RIS that only those operating under an *advanced licence* would be permitted to *trade* at all. The department cannot determine if they would have a differing opinion if they were not of this understanding.

Through the comments provided it was also apparent that there were differing interpretations of what '*trade*' means. Twenty-seven respondents (3.1%) believed that *trade* is only when money is exchanged for the animal and not where the animal is given away. Therefore, some respondents may have erroneously considered that they do not undertake *trade*, and thus their practices are unaffected by the question, as they give away animals rather than engage in monetary transactions.

Question 8: Currently people can take scorpions, spiders, and amphibians from the wild for a *recreational purpose* without needing a licence. Should this be allowed to continue?

The purpose of this question was to determine if members of the public agreed that the *take* of scorpions, spiders and amphibians from the wild for a *recreational purpose* should be allowed to continue.

Of the 869 total respondents to the survey, 868 responded to the question. Of these, 257 (29.6%) thought it should be allowed to continue, and 611 (70.4%) thought it should not be allowed to continue.

There were no comments in relation to this question.

Question 9: In considering the options proposed, which wildlife framework option do you prefer?

The purpose of this question was to determine which of the proposed wildlife framework options was preferred by members of the public.

Of the 869 total respondents to the survey, 849 responded to this question:

- 270 (31.8%) respondents indicated they preferred status quo – no change to the wildlife framework;
- 83 (9.8%) respondents indicated they preferred Option 2 – allow a maximum of five native animals under a standard or *specialised licence*;
- 167 (19.7%) respondents indicated they preferred Option 3 – allows more than five native animals under a standard or *specialised licence*;
- 128 (15.1%) respondents indicated they preferred option 4 – allows more than five 'class 1' animals under a standard or *specialised licence*, but no more than five 'class 2' animals under a *specialised licence*;
- 21 (2.5%) respondents indicated they have no preferred approach; and
- 180 (21.2%) respondents indicated their preferred approach is not identified.

However, of the 180 respondents who indicated their preferred approach is not identified, in providing comments, 56 identified that the status quo is their preferred approach. This *take* the adjusted total of respondents in favour of the status quo to 326 out of 868 (37.6%).

Of the remaining 124 respondents who indicated that the RIS did not identify their preferred approach:

- 14 (11.3%) provided comments indicating that they preferred option two with modifications to increase the limit on the number of animals that may be kept;
- 9 (7.3%) provided comments indicating that they preferred option three with modifications to increase the limit on the number of animals that may be kept. This included the limit on the number of dangerous snakes that may be kept by licence holders;
- 9 (7.3%) provided comments indicating that they preferred option four with modifications to increase the limit on the number of animals that may be kept under standard and *specialised licences*;
- 28 (22.6%) provided general comments in relation to animal *keep* limits and their preferred approach was to have a licence that had limits of more than five animals for standard and *specialised licences*; and
- 64 (51.6%) provided general comments with no details as to why their preferred approach was not identified.

Question 10: If you currently keep native wildlife, we would appreciate further information from you. Are you willing to answer more detailed questions about your licence and the animals you keep?

The purpose of this question was to initiate the subsequent questions to collect more information from current wildlife authority holders under the *Nature Conservation Act 1992*, in order to give the department a better understanding of the recreational *keeping* market. The question asked if respondents were willing to provide more information about their licence and the animals they *keep*.

Of the 869 total respondents to the survey, 844 (97%) responded to this question:

- 650 (77.0%) agreed to provide more information about their licence and the animals they *keep*;
- 83 (9.8%) indicated they were not willing to provide more information; and

- 111 (13.2%) identified that they do not *keep* native animals.

The survey ended at this point for respondents who provided no response, or who responded with 'No' or 'I don't *keep* native animals'.

Question 11: What licence or permit do you currently hold? If you hold more than one licence and one of them is a *Recreational* or *Commercial wildlife licence* please choose that option.

The purpose of this question was to determine the type of licence or permit held by members of the public. Respondents were encouraged to list their primary licence where more than one type was held.

Of the 869 respondents to the survey, 645 (74%) responded to this question:

- 560 (86.8%) identified as holding a *recreational wildlife licence*;
- 12 (1.9%) identified as holding a *Commercial wildlife licence*;
- 14 (2.2%) identified as holding a Rehabilitation Permit;
- 9 (1.4%) identified as holding a Permit to Keep;
- 4 (0.6%) identified as holding a Damage Mitigation Permit; and
- 46 (7.1%) identified as holding a licence other than one listed.

Of the respondents identifying as holding a licence other than one listed, twenty-one indicated they held a *recreational wildlife licence*. Using these comments, the adjusted figures for this question are that 581 (66.9%) of total respondents identified as holding a *recreational wildlife licence*. Of the remaining 25 respondents with a licence other than one listed, six respondents indicated they held a Rehabilitation Permit and four respondents indicated they held a Damage Mitigation Permit.

Of the remaining 15 with an alternative licence, their responses included licences held in other States and Territories, or that they held no licence as the animals they *keep* are exempt.

Question 12: How many animals do you keep under your licence?

The purpose of this question was to collect more information on the number of animals kept by wildlife licence holders to better inform an animal limit proposed in the Consultation *Regulatory Impact Statement*.

Of the 869 respondents to the survey, 568 (65.4%) responded to this question. Of these:

- 179 (31.5%) question respondents indicated they *keep* 1-5 animals;
- 135 (23.8%) question respondents indicated they *keep* 6-10 animals;
- 99 (17.4%) question respondents indicated they *keep* 11-20 animals;
- 94 (16.6%) question respondents indicated they *keep* 21-50 animals; and
- 61 (10.7%) question respondents indicated they *keep* 51+ animals.

The department did not analyse for correlations between individuals' responses with questions four and five.

Question 13: What types of animals do you keep under your licence (select more than one if applicable)?

The purpose of this question was to collect more information in relation to the type of animals licence holders *keep* under their licence.

Of the 869 respondents to the survey, 568 (65.4%) responded to this question, and respondents were able to choose more than one option. Consequently, the percentage responses for this question cumulatively add to more than 100%. The responses were as follows:

- 171 (30.1%) question respondents indicated they *keep* birds;
- 303 (53.4%) question respondents indicated they *keep* lizards;
- 388 (68.3%) question respondents indicated they *keep* non-venomous snakes;
- 54 (9.5%) question respondents indicated they *keep* venomous snakes;
- 52 (9.2%) question respondents indicated they *keep* scorpions;

- 61 (10.7%) question respondents indicated they *keep* spiders; and
- 53 (9.3%) question respondents indicated they *keep* amphibians.

Question 14: Do you only keep eclectus parrots or green pythons under your licence?

The purpose of this question was to identify if any licence holders kept only eclectus parrots or green pythons. This was to assist in identifying if transitioning these animals from listing as an *international animal* to a class 2 animal would affect licence holders.

Of the 869 respondents to the survey, 570 (65.6%) responded to this question. Of these, 71 (12.5%) indicated they *keep* eclectus parrots and/or green pythons and 499 (87.5%) indicated they do not *keep* eclectus parrots and/or green pythons.

Question 15: Do you keep any animals for breeding purposes?

The purpose of this question was to identify how many licence holders *keep* animals for breeding purposes. This was to assist in identifying how licences that prohibit breeding may affect the recreational *keeping* market.

Of the 869 respondents to the survey, 570 (65.6%) responded to this question. Of these, 327 (57.4%) indicated they *keep* animals for breeding purposes and 243 (42.6%) indicated they do not *keep* animals for breeding purposes.

Question 16: Do you trade animals with recreational wildlife licence holders?

The intent of this question was to collect information in relation to the *trading* patterns of the recreational *keeping* market. If *trading*, licence holders were also asked to indicate their *trade* frequency.

Of the 869 respondents to the survey, 568 (65.4%) responded to this question. Of these:

- 141 (24.8%) respondents indicated they *trade* animals with *recreational wildlife licence* holders less than once per year;
- 146 (25.7%) respondents indicated they *trade* animals with *recreational wildlife licence* holders more than once per year but less than six times per year;
- 91 (16.0%) respondents indicated they *trade* animals with *recreational wildlife licence* holders more than six times per year; and
- 190 (33.5%) respondents indicated they do not *trade* animals with *recreational wildlife licence* holders.

Question 17: Do you trade animals with Commercial wildlife licence holders?

The purpose of this question was to collect information in relation to the *trading* patterns of *trading* interactions with *Commercial wildlife licence* holders. If *trading*, licence holders were also asked to indicate their *trade* frequency.

Of the 869 respondents to the survey, 569 (65.5%) responded to this question. Of these respondents:

- 86 (15%) indicated they *trade* animals with *Commercial wildlife licence* holders less than once per year;
- 53 (9.3%) indicated they *trade* animals with *Commercial wildlife licence* holders more than once per year but less than six times per year;
- 21 (3.7%) indicated they *trade* animals with *Commercial wildlife licence* holders more than six times per year; and
- 409 (72%) indicated they do not *trade* animals with *Commercial wildlife licence* Holders.

Question 18: Under the proposed species lists, it is proposed that some bird species will become 'exempt' animals, and thus not require a licence to keep. Will this mean that you no longer require a licence?

The purpose of this question was to collect more information if a licence would no longer be required as a result of some bird species becoming 'exempt' animals under the proposed species list in the Consultation *Regulatory Impact Statement*.

Of the 869 respondents to the survey, 569 (65.5%) people responded to this question. Of these, 68 (12.0%) indicated they would no longer require a wildlife licence and 501 (88.1%) indicated they would be required to retain

their wildlife licence.

Question 19: If you wish to continue with your animal keeping practices, under the proposed licence framework, will you require a more expensive licence?

The purpose of this question was to identify if licence holders would require a more expensive licence under the proposed framework as a result of their current animal *keeping* practices.

Of the 869 respondents to the survey, 566 (65%) responded to this question. Of these, 456 (80.6%) indicated they would require a more expensive licence and 110 (19.4%) indicated they would not require a more expensive licence.

Question 20: Please identify which of the following, select all that apply, would result in you requiring a more expensive licence.

The purpose of this question was identify the reason why a licence holder would require a more expensive licence.

Of the 869 respondents to the survey, 535 (61.6%) responded to this question. The survey allowed selection of more than one option for this question. Responses were as follows:

- 437 (81.7%) question respondents indicated a more expensive licence would be required on the number of animals kept;
- 342 (63.9%) question respondents indicated a more expensive licence would be required based on the species of animals kept;
- 358 (66.9%) question respondents indicated a more expensive licence would be required to be authorised to breed animals; and
- 271 (50.7%) question respondents indicated a more expensive licence would be required to be authorised to *trade* animals.

Attachment 5: Final species list

CATEGORY	RELEVANT PROTECTED ANIMALS																																																																						
EXEMPT	<p>1. Birds:</p> <p>The following birds are exempt animals—</p> <table> <tr> <th>Common name</th><th>Scientific name</th></tr> <tr> <td>Australian ringneck</td><td><i>Barnardius zonarius</i></td></tr> <tr> <td>sulphur-crested cockatoo</td><td><i>Cacatua galerita</i></td></tr> <tr> <td>western corella</td><td><i>Cacatua pastinator</i></td></tr> <tr> <td>little corella</td><td><i>Cacatua sanguinea</i></td></tr> <tr> <td>long-billed corella</td><td><i>Cacatua tenuirostris</i></td></tr> <tr> <td>emerald dove</td><td><i>Chalcophaps indica</i></td></tr> <tr> <td>stubble quail</td><td><i>Coturnix pectoralis</i></td></tr> <tr> <td>brown quail</td><td><i>Coturnix ypsilophora</i></td></tr> <tr> <td>painted finch</td><td><i>Emblema pictum</i></td></tr> <tr> <td>galah</td><td><i>Eolophus roseicapilla</i></td></tr> <tr> <td>Gouldian finch</td><td><i>Erythrura gouldiae</i></td></tr> <tr> <td>blue-faced parrot finch</td><td><i>Erythrura trichroa</i></td></tr> <tr> <td>king quail</td><td><i>Excalfactoria chinensis</i></td></tr> <tr> <td>diamond dove</td><td><i>Geopelia cuneata</i></td></tr> <tr> <td>bar-shouldered dove</td><td><i>Geopelia humeralis</i></td></tr> <tr> <td>peaceful dove</td><td><i>Geopelia striata</i></td></tr> <tr> <td>spinifex pigeon</td><td><i>Geophaps plumifera</i></td></tr> <tr> <td>musk lorikeet</td><td><i>Glossopsitta concinna</i></td></tr> <tr> <td>purple-crowned lorikeet</td><td><i>Glossopsitta porphyrocephala</i></td></tr> <tr> <td>pictorella mannikin</td><td><i>Heteromunia pectoralis</i></td></tr> <tr> <td>chestnut-breasted manikin</td><td><i>Lonchura castaneothorax</i></td></tr> <tr> <td>yellow-rumped mannikin</td><td><i>Lonchura flaviprymna</i></td></tr> <tr> <td>budgerigar</td><td><i>Melopsittacus undulatus</i></td></tr> <tr> <td>plum-headed finch</td><td><i>Neochmia modesta</i></td></tr> <tr> <td>crimson finch</td><td><i>Neochmia phaeton</i></td></tr> <tr> <td>star finch</td><td><i>Neochmia ruficauda</i></td></tr> <tr> <td>red-browed finch</td><td><i>Neochmia temporalis</i></td></tr> <tr> <td>blue-winged parrot</td><td><i>Neophema chrysostoma</i></td></tr> <tr> <td>elegant parrot</td><td><i>Neophema elegans</i></td></tr> <tr> <td>rock parrot</td><td><i>Neophema petrophila</i></td></tr> <tr> <td>turquoise parrot</td><td><i>Neophema pulchella</i></td></tr> <tr> <td>scarlet-chested parrot</td><td><i>Neophema splendida</i></td></tr> <tr> <td>Bourke's parrot</td><td><i>Neopsephotus bourkii</i></td></tr> <tr> <td>blue bonnet</td><td><i>Northiella haematogaster</i></td></tr> </table>	Common name	Scientific name	Australian ringneck	<i>Barnardius zonarius</i>	sulphur-crested cockatoo	<i>Cacatua galerita</i>	western corella	<i>Cacatua pastinator</i>	little corella	<i>Cacatua sanguinea</i>	long-billed corella	<i>Cacatua tenuirostris</i>	emerald dove	<i>Chalcophaps indica</i>	stubble quail	<i>Coturnix pectoralis</i>	brown quail	<i>Coturnix ypsilophora</i>	painted finch	<i>Emblema pictum</i>	galah	<i>Eolophus roseicapilla</i>	Gouldian finch	<i>Erythrura gouldiae</i>	blue-faced parrot finch	<i>Erythrura trichroa</i>	king quail	<i>Excalfactoria chinensis</i>	diamond dove	<i>Geopelia cuneata</i>	bar-shouldered dove	<i>Geopelia humeralis</i>	peaceful dove	<i>Geopelia striata</i>	spinifex pigeon	<i>Geophaps plumifera</i>	musk lorikeet	<i>Glossopsitta concinna</i>	purple-crowned lorikeet	<i>Glossopsitta porphyrocephala</i>	pictorella mannikin	<i>Heteromunia pectoralis</i>	chestnut-breasted manikin	<i>Lonchura castaneothorax</i>	yellow-rumped mannikin	<i>Lonchura flaviprymna</i>	budgerigar	<i>Melopsittacus undulatus</i>	plum-headed finch	<i>Neochmia modesta</i>	crimson finch	<i>Neochmia phaeton</i>	star finch	<i>Neochmia ruficauda</i>	red-browed finch	<i>Neochmia temporalis</i>	blue-winged parrot	<i>Neophema chrysostoma</i>	elegant parrot	<i>Neophema elegans</i>	rock parrot	<i>Neophema petrophila</i>	turquoise parrot	<i>Neophema pulchella</i>	scarlet-chested parrot	<i>Neophema splendida</i>	Bourke's parrot	<i>Neopsephotus bourkii</i>	blue bonnet	<i>Northiella haematogaster</i>
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chestnut-breasted manikin	<i>Lonchura castaneothorax</i>																																																																						
yellow-rumped mannikin	<i>Lonchura flaviprymna</i>																																																																						
budgerigar	<i>Melopsittacus undulatus</i>																																																																						
plum-headed finch	<i>Neochmia modesta</i>																																																																						
crimson finch	<i>Neochmia phaeton</i>																																																																						
star finch	<i>Neochmia ruficauda</i>																																																																						
red-browed finch	<i>Neochmia temporalis</i>																																																																						
blue-winged parrot	<i>Neophema chrysostoma</i>																																																																						
elegant parrot	<i>Neophema elegans</i>																																																																						
rock parrot	<i>Neophema petrophila</i>																																																																						
turquoise parrot	<i>Neophema pulchella</i>																																																																						
scarlet-chested parrot	<i>Neophema splendida</i>																																																																						
Bourke's parrot	<i>Neopsephotus bourkii</i>																																																																						
blue bonnet	<i>Northiella haematogaster</i>																																																																						

	cockatiel crested pigeon little lorikeet common bronzewing pale-headed rosella Adelaide rosella crimson rosella yellow rosella eastern rosella western rosella northern rosella long-tailed finch black-throated finch masked finch princess parrot regent parrot superb parrot hooded parrot red-rumped parrot mulga parrot varied lorikeet red-capped parrot diamond firetail double-barred finch zebra finch scaly-breasted lorikeet rainbow lorikeet rainbow (red-collared) lorikeet black-breasted button-quail painted button-quail little button-quail	<i>Nymphicus hollandicus</i> <i>Ocyphaps lophotes</i> <i>Parvipsitta pusilla</i> <i>Phaps chalcoptera</i> <i>Platycercus adscitus</i> <i>Platycercus elegans adalaidae</i> <i>Platycercus elegans elegans</i> <i>Platycercus elegans flaveolus</i> <i>Platycercus eximius</i> <i>Platycercus icterotis</i> <i>Platycercus venustus</i> <i>Poephila acuticauda</i> <i>Poephila cincta</i> <i>Poephila personata</i> <i>Polytelis alexandrae</i> <i>Polytelis anthopeplus</i> <i>Polytelis swainsonii</i> <i>Psephotus dissimilis</i> <i>Psephotus haematonotus</i> <i>Psephotus varius</i> <i>Psitteuteles versicolor</i> <i>Purpureicephalus spurius</i> <i>Stagonopleura guttata</i> <i>Taeniopygia bichenovii</i> <i>Taeniopygia guttata</i> <i>Trichoglossus chlorolepidotus</i> <i>Trichoglossus haematodus moluccanus</i> <i>Trichoglossus haematodus rubritorquatus</i> <i>Turnix melanogaster</i> <i>Turnix varius</i> <i>Turnix velox</i>
CLASS 1	2. Amphibians: The following amphibians are class 1 animals—	
	Common name beeping froglet clicking froglet Sloane's froglet greenstripe frog northern snapping frog superb collared frog	Scientific name <i>Crinia parinsignifera</i> <i>Crinia signifera</i> <i>Crinia sloanei</i> <i>Cyclorana alboguttata</i> <i>Cyclorana australis</i> <i>Cyclorana brevipes</i>

eastern snapping frog	<i>Cyclorana novaehollandiae</i>
water holding frog	<i>Cyclorana platycephala</i>
grey bellied pobblebonk	<i>Limnodynastes dumerilii</i>
barking frog	<i>Limnodynastes fletcheri</i>
giant bullfrog	<i>Limnodynastes interioris</i>
striped marshfrog	<i>Limnodynastes peronii</i>
salmon striped frog	<i>Limnodynastes salmini</i>
spotted grassfrog	<i>Limnodynastes tasmaniensis</i>
scarlet sided pobblebonk	<i>Limnodynastes terraereginae</i>
northern sedgefrog	<i>Litoria bicolor</i>
common green treefrog	<i>Litoria caerulea</i>
orange eyed treefrog	<i>Litoria chloris</i>
Blue Mountains treefrog	<i>Litoria citropa</i>
bleating treefrog	<i>Litoria dentata</i>
southern brown tree frog	<i>Litoria ewingii</i>
eastern sedgefrog	<i>Litoria fallax</i>
wallum rocketfrog	<i>Litoria freycineti</i>
Centralian treefrog	<i>Litoria gilleni</i>
graceful treefrog	<i>Litoria gracilenta</i>
white lipped treefrog	<i>Litoria infrafronata</i>
Jervis Bay treefrog	<i>Litoria jervisiensis</i>
northern stony creek frog	<i>Litoria jungguy</i>
broad palmed rocketfrog	<i>Litoria latopalmata</i>
stony creek frog	<i>Litoria lesueuri</i>
Moore's frog	<i>Litoria moorei</i>
striped rocketfrog	<i>Litoria nasuta</i>
leaf green treefrog	<i>Litoria nudidigita</i>
emerald spotted treefrog	<i>Litoria peronii</i>
green stream frog	<i>Litoria phyllochroa</i>
northern laughing treefrog	<i>Litoria rothii</i>
desert treefrog	<i>Litoria rubella</i>
magnificent treefrog	<i>Litoria splendida</i>
southern laughing treefrog	<i>Litoria tyleri</i>
whistling treefrog	<i>Litoria verreauxii</i>
eastern stony creek frog	<i>Litoria wilcoxii</i>
trilling frog	<i>Neobatrachus centralis</i>
meeowing frog	<i>Neobatrachus sudellae</i>
ornate burrowing frog	<i>Platyplectrum ornatum</i>
big shouldered gungan	<i>Uperoleia capitulata</i>
dusky toadlet	<i>Uperoleia fusca</i>
eastern gungan	<i>Uperoleia laevigata</i>
chubby gungan	<i>Uperoleia rugosa</i>

Tyler's toadlet	<i>Uperoleia tyleri</i>
3. Birds:	
The following birds are class 1 animals—	
Common name	Scientific name
king parrot	<i>Alisterus scapularis</i>
chestnut teal	<i>Anas castanea</i>
grey teal	<i>Anas gracilis</i>
black duck	<i>Anas superciliosa</i>
red-winged parrot	<i>Aprosmictus erythropterus</i>
hardhead	<i>Aythya australis</i>
gang gang cockatoo	<i>Callocephalon fimbriatum</i>
red-tailed black-cockatoo	<i>Calyptorhynchus banksii</i>
yellow-tailed black-cockatoo	<i>Calyptorhynchus funereus</i>
Cape Barren goose	<i>Cereopsis novaehollandiae</i>
maned duck or wood duck	<i>Chenonetta jubata</i>
white-headed pigeon	<i>Columba leucomela</i>
Macleay's fig parrot	<i>Cyclopsitta diophthalma macleayana</i>
wandering whistling-duck	<i>Dendrocygna arcuata</i>
plumed whistling-duck	<i>Dendrocygna eytoni</i>
pied imperial-pigeon	<i>Ducula bicolor</i>
eclectus parrot	<i>Eclectus roratus</i> , other than <i>Eclectus roratus macgillivrayi</i>
crimson chat	<i>Epthianura tricolor</i>
squatter pigeon	<i>Geophaps scripta</i>
partridge pigeon	<i>Geophaps smithii</i>
swift parrot	<i>Lathamus discolor</i>
wonga pigeon	<i>Leucosarcia melanoleuca</i>
Major Mitchell's cockatoo (pink cockatoo)	<i>Lophochroa leadbeateri</i>
brown cuckoo-dove	<i>Macropygia amboinensis</i>
pink-eared duck	<i>Malacorhynchus membranaceus</i>
superb fairy-wren	<i>Malurus cyaneus</i>
splendid fairy-wren	<i>Malurus splendens</i>
naretha blue bonnet	<i>Northiella narethae</i>
blue-billed duck	<i>Oxyura australis</i>
white-quilled rock-pigeon	<i>Petrophassa albipennis</i>
chestnut quilled rock-pigeon	<i>Petrophassa rufipennis</i>
brush bronzewing	<i>Phaps elegans</i>
flock bronzewing	<i>Phaps histrionica</i>
green rosella	<i>Platycercus caledonicus</i>
golden-shouldered parrot	<i>Psephotus chrysopterygius</i>

rose-crowned fruit-dove	<i>Ptilinopus regina</i>
superb fruit-dove	<i>Ptilinopus superbus</i>
figbird	<i>Sphecotheres vieilloti</i>
beautiful firetail	<i>Stagonopleura bella</i>
red-eared firetail	<i>Stagonopleura oculata</i>
radjah shelduck	<i>Tadorna radjah</i>
Australian shelduck	<i>Tadorna tadornoides</i>
red-backed button-quail	<i>Turnix maculosus</i>
buff-breasted button-quail	<i>Turnix olivii</i>
red-chested button-quail	<i>Turnix pyrrhothorax</i>
silveryeye	<i>Zosterops lateralis</i>
4. Invertebrates:	
The following invertebrates are class 1 animals—	
(a) all protected spiders;	
(b) all protected scorpions	
5. Reptiles	
The following reptiles are class 1 animals—	
Common name	Scientific name
red-throated cool-skink	<i>Acritoscincus platynotum</i>
Lesueur's velvet gecko	<i>Amalosia lesueurii</i>
Burns's dragon	<i>Amphibolurus burnsi</i>
centralian lashtail dragon	<i>Amphibolurus centralis</i>
Gilbert's dragon	<i>Amphibolurus gilberti</i>
long-nosed dragon	<i>Amphibolurus longirostris</i>
jacky lizard	<i>Amphibolurus muricatus</i>
swamplands lashtail	<i>Amphibolurus temporalis</i>
children's python	<i>Antaresia childreni</i>
spotted python	<i>Antaresia maculosa</i>
pygmy python	<i>Antaresia perthensis</i>
Stimson's python	<i>Antaresia stimsoni</i>
black-headed worm-lizard	<i>Aprasia picturata</i>
black-headed python	<i>Aspidites melanocephalus</i>
woma	<i>Aspidites ramsayi</i>
major skink	<i>Bellatorias frerei</i>
land mullet	<i>Bellatorias major</i>
brown tree snake	<i>Boiga irregularis</i>
Cann's longneck turtle	<i>Chelodina canni</i>
broad-shelled river turtle	<i>Chelodina expansa</i>

eastern snake-necked turtle	<i>Chelodina longicollis</i>
northern snake-necked turtle	<i>Chelodina rugosa</i>
marbled southern gecko	<i>Christinus marmoratus</i>
bar-sided skink	<i>Concinnia tenuis</i>
striped snake-eyed skink	<i>Cryptoblepharus virgatus</i>
central netted dragon	<i>Ctenophorus nuchalis</i>
painted dragon	<i>Ctenophorus pictus</i>
pale-rumped ctenotus	<i>Ctenotus regius</i>
robust ctenotus	<i>Ctenotus robustus</i>
Schomburgk's ctenotus	<i>Ctenotus schomburgkii</i>
straight-browed ctenotus	<i>Ctenotus spaldingi</i>
copper-tailed skink	<i>Ctenotus taeniolatus</i>
she-oak slender blue-tongue lizard	<i>Cyclodomorphus casuarinae</i>
pink-tongued lizard	<i>Cyclodomorphus gerrardii</i>
mainland she-oak skink	<i>Cyclodomorphus michaeli</i>
Gulf delma	<i>Delma malleri</i>
excitable delma	<i>Delma tincta</i>
green tree snake	<i>Dendrelaphis punctulatus</i>
tessellated gecko	<i>Diplodactylus tessellatus</i>
wood gecko	<i>Diplodactylus vittatus</i>
tommy roundhead	<i>Diporiphora australis</i>
nobbi	<i>Diporiphora nobbi</i>
Cunningham's skink	<i>Egernia cunninghami</i>
Hosmer's skink	<i>Egernia hosmeri</i>
desert skink	<i>Egernia inornata</i>
King's skink	<i>Egernia kingii</i>
black crevice-skink	<i>Egernia saxatilis</i>
gidgee skink	<i>Egernia stokesii</i>
tree skink	<i>Egernia striolata</i>
northern snapping turtle	<i>Elseya dentata</i>
Mary River turtle	<i>Elusor macrurus</i>
river turtle	<i>Emydura macquarii</i>
narrow-banded sand swimmer	<i>Eremiascincus fasciolatus</i>
ghost skink	<i>Eremiascincus phantasmus</i>
broad-banded sand swimmer	<i>Eremiascincus richardsonii</i>
eastern water skink	<i>Eulamprus quoyii</i>
northern dtella	<i>Gehyra australis</i>
dubious dtella	<i>Gehyra dubia</i>
Kimberley Plateau dtella	<i>Gehyra occidentalis</i>
varied dtella	<i>Gehyra versicolor</i>
Bynoe's gecko	<i>Heteronotia binoei</i>
cave prickly gecko	<i>Heteronotia spelea</i>

eastern water dragon	<i>Intellagama lesueurii</i>
Murray's skink	<i>Karma murrayi</i>
dark-flecked garden sunskink	<i>Lampropholis delicata</i>
pale-flecked garden sunskink	<i>Lampropholis guichenoti</i>
Burton's legless lizard	<i>Lialis burtonis</i>
water python	<i>Liasis fuscus</i>
olive python	<i>Liasis olivaceus</i>
eastern ranges rock-skink	<i>Liopholis modesta</i>
White's skink	<i>Liopholis whitii</i>
southern angle-headed dragon	<i>Lophosaurus spinipes</i>
beaded gecko	<i>Lucasium damaeum</i>
Steindachner's gecko	<i>Lucasium steindachneri</i>
common dwarf skink	<i>Menetia greyii</i>
centralian carpet python	<i>Morelia bredli</i>
rough-scaled python	<i>Morelia carinata</i>
carpet python	<i>Morelia spilota</i>
green python	<i>Morelia viridis</i>
south-eastern morethia skink	<i>Morethia boulengeri</i>
west coast morethia skink	<i>Morethia lineoocellata</i>
robust velvet gecko	<i>Nebulifera robusta</i>
centralian knob-tailed gecko	<i>Nephurus amya</i>
rough knob-tailed gecko	<i>Nephurus asper</i>
smooth knob-tail gecko	<i>Nephurus laevis</i>
three-lined knob-tail gecko	<i>Nephurus levis</i>
Kimberley rough knob-tail gecko	<i>Nephurus sheai</i>
stellate knob-tail gecko	<i>Nephurus stellatus</i>
banded knob-tail gecko	<i>Nephurus wheeleri</i>
Gulf marbled velvet gecko	<i>Oedura bella</i>
northern velvet gecko	<i>Oedura castelnaui</i>
inland marbled velvet gecko	<i>Oedura cincta</i>
northern spotted velvet gecko	<i>Oedura coggeri</i>
fringe-toed velvet gecko	<i>Oedura filicipoda</i>
marbled velvet gecko	<i>Oedura marmorata</i>
ocellated velvet gecko	<i>Oedura monilis</i>
southern spotted velvet gecko	<i>Oedura tryoni</i>
Dwyer's snake	<i>Parasuta dwyeri</i>
broad-tailed gecko	<i>Phyllurus platurus</i>
bearded dragon	<i>Pogona barbata</i>
downs bearded dragon	<i>Pogona henrylawsoni</i>
pygmy bearded dragon	<i>Pogona minor</i>
north-west bearded dragon	<i>Pogona mitchelli</i>
central bearded dragon	<i>Pogona vitticeps</i>

	common scaly-foot hooded scaly-foot eastern hooded scaly-foot mountain heath dragon northern leaf-tailed gecko Moritz's leaf-tailed gecko rough-throated leaf-tailed gecko southern leaf-tailed gecko amethystine python amethystine python slaty-grey snake spiny-tailed gecko southern spiny-tailed gecko southern phasmid gecko Kristin's spiny-tailed gecko golden-tailed gecko western shield spiny-tailed gecko soft-spined gecko centralian blue-tongued lizard blotched blue-tongued lizard shingle-back eastern blue-tongued lizard keelback snake thick-tailed gecko ridge-tailed monitor pygmy mulga monitor sand monitor Mertens' water monitor spotted tree monitor Storr's monitor black-tailed monitor saw-shelled turtle	<i>Pygopus lepidopodus</i> <i>Pygopus nigriceps</i> <i>Pygopus schraderi</i> <i>Rankinia diemensis</i> <i>Saltuarius cornutus</i> <i>Saltuarius moritzi</i> <i>Saltuarius salebrosus</i> <i>Saltuarius swaini</i> <i>Simalia amethystina</i> <i>Simalia kinghorni</i> <i>Stegonotus cucullatus</i> <i>Strophurus ciliaris</i> <i>Strophurus intermedius</i> <i>Strophurus jeanae</i> <i>Strophurus krisalys</i> <i>Strophurus taenicauda</i> <i>Strophurus wellingtonae</i> <i>Strophurus williamsi</i> <i>Tiliqua multifasciata</i> <i>Tiliqua nigrolutea</i> <i>Tiliqua rugosa</i> <i>Tiliqua scincoides</i> <i>Tropidonophis mairii</i> <i>Underwoodisaurus milii</i> <i>Varanus acanthurus</i> <i>Varanus gilleni</i> <i>Varanus gouldii</i> <i>Varanus mertensi</i> <i>Varanus scalaris</i> <i>Varanus storri</i> <i>Varanus tristis</i> <i>Wollumbinia latisternum</i>												
CLASS 2	6. Amphibians: The following amphibians are class 2 animals— <table><tr><th>Common name</th><th>Scientific name</th></tr><tr><td>tusked frog</td><td><i>Adelotus brevis</i></td></tr><tr><td>pouched frog</td><td><i>Assa darlingtoni</i></td></tr><tr><td>chirping froglet</td><td><i>Crinia deserticola</i></td></tr><tr><td>wallum froglet</td><td><i>Crinia tinnula</i></td></tr><tr><td>grassland collared frog</td><td><i>Cyclorana cultripes</i></td></tr></table>	Common name	Scientific name	tusked frog	<i>Adelotus brevis</i>	pouched frog	<i>Assa darlingtoni</i>	chirping froglet	<i>Crinia deserticola</i>	wallum froglet	<i>Crinia tinnula</i>	grassland collared frog	<i>Cyclorana cultripes</i>	
Common name	Scientific name													
tusked frog	<i>Adelotus brevis</i>													
pouched frog	<i>Assa darlingtoni</i>													
chirping froglet	<i>Crinia deserticola</i>													
wallum froglet	<i>Crinia tinnula</i>													
grassland collared frog	<i>Cyclorana cultripes</i>													

rough collared frog	<i>Cyclorana verrucosa</i>
Tasmanian smooth froglet	<i>Geocrinia laevis</i>
Victorian smooth froglet	<i>Geocrinia victoriana</i>
orange-bellied Frog	<i>Geocrinia vitellina</i>
giant burrowing frog	<i>Heleioporus australiacus</i>
green and golden bell frog	<i>Litoria aurea</i>
Booroolong frog	<i>Litoria booroolongensis</i>
green thighed frog	<i>Litoria brevipalmata</i>
Tasmanian treefrog	<i>Litoria burrowsae</i>
northern waterfrog	<i>Litoria dahlia</i>
growling green eyed frog	<i>Litoria eucnemis</i>
Littlejohn's treefrog	<i>Litoria littlejohni</i>
cascade treefrog	<i>Litoria pearsoniana</i>
southern bell frog	<i>Litoria raniformis</i>
whirring treefrog	<i>Litoria revelata</i>
orange thighed treefrog	<i>Litoria xanthomera</i>
stuttering frog	<i>Mixophyes balbus</i>
great barred frog	<i>Mixophyes fasciolatus</i>
giant barred frog	<i>Mixophyes iteratus</i>
holy cross frog	<i>Notaden bennettii</i>
desert shovelfoot	<i>Notaden nichollsi</i>
Haswell's froglet	<i>Paracrinia haswelli</i>
red-and-yellow mountainfrog	<i>Philoria kundagungan</i>
masked mountainfrog	<i>Philoria loveridgei</i>
sphagnum frog	<i>Philoria sphagnicolus</i>
red crowned toadlet	<i>Pseudophryne australis</i>
Bibron's toadlet	<i>Pseudophryne bibronii</i>
red backed broodfrog	<i>Pseudophryne coriacea</i>
southern toadlet	<i>Pseudophryne dendyi</i>
great brown broodfrog	<i>Pseudophryne major</i>
southern toadlet	<i>Pseudophryne semimarmorata</i>
7. Birds:	
The following birds are class 2 animals—	
Common name	Scientific name
spiny-cheeked honeyeater	<i>Acanthagenys rufogularis</i>
yellow-rumped thornbill	<i>Acanthiza chrysorrhoa</i>
western spinebill	<i>Acanthorhynchus superciliosus</i>
eastern spinebill	<i>Acanthorhynchus tenuirostris</i>
green catbird	<i>Ailuroedus crassirostris</i>
Australian brush turkey	<i>Alectura lathamii</i>

striated grasswren	<i>Amytornis striatus</i>
thick-billed grasswren	<i>Amytornis textilis</i>
Australasian shoveler	<i>Anas rhynchos</i>
magpie goose	<i>Anseranas semipalmata</i>
little wattlebird	<i>Anthochaera chrysoptera</i>
red wattlebird	<i>Anthochaera carunculata</i>
metallic starling	<i>Aplonis metallica</i>
black-faced woodswallow	<i>Artamus cinereus</i>
dusky woodswallow	<i>Artamus cyanopterus</i>
white-breasted woodswallow	<i>Artamus leucorhynchus</i>
masked woodswallow	<i>Artamus personatus</i>
white-browed woodswallow	<i>Artamus superciliosus</i>
musk duck	<i>Biziura lobata</i>
cattle egret	<i>Bubulcus ibis</i>
bush-stone curlew	<i>Burhinus grallarius</i>
yellow-faced honeyeater	<i>Caligavis chrysops</i>
Baudin's black-cockatoo	<i>Calyptorhynchus baudinii</i>
glossy black-cockatoo	<i>Calyptorhynchus lathami</i>
Carnaby's black-cockatoo	<i>Calyptorhynchus latirostris</i>
pheasant coucal	<i>Centropus phasianinus</i>
pied honeyeater	<i>Certhionyx variegatus</i>
inland dotterel	<i>Charadrius australis</i>
spotted bowerbird	<i>Chlamydera maculata</i>
banded stilt	<i>Cladorhynchus leucocephalus</i>
white-winged chough	<i>Corcorax melanorhamphos</i>
Torresian crow	<i>Corvus orru</i>
Australian magpie	<i>Cracticus tibicen</i>
black swan	<i>Cygnus atratus</i>
blue-winged kookaburra	<i>Dacelo leachii</i>
laughing kookaburra	<i>Dacelo novaeguineae</i>
mistletoebird	<i>Dicaeum hirundinaceum</i>
eclectus parrot (Australian subspecies)	<i>Eclectus roratus macgillivrayi</i>
little egret	<i>Egretta garzetta</i>
white-faced heron	<i>Egretta novaehollandiae</i>
pied heron	<i>Egretta picata</i>
blue-faced honeyeater	<i>Entomyzon cyanotis</i>
eastern yellow robin	<i>Eopsaltria australis</i>
white-fronted chat	<i>Epthianura albifrons</i>
orange chat	<i>Epthianura aurifrons</i>
chestnut rail	<i>Eulabeornis castaneoventris</i>
dollarbird	<i>Eurystomus orientalis</i>
eurasian coot	<i>Fulica atra</i>

Tasmanian native hen	<i>Gallinula mortierii</i>
dusky moorhen	<i>Gallinula tenebrosus</i>
black-tailed native-hen	<i>Gallinula ventralis</i>
buff-banded rail	<i>Gallirallus philippensis</i>
magpie-lark	<i>Grallina cyanoleuca</i>
black-winged stilt	<i>Himantopus himantopus</i>
yellow-tufted honeyeater	<i>Lichenostomus melanops</i>
topnot pigeon	<i>Lopholaimus antarcticus</i>
purple-backed fairy-wren	<i>Malurus assimilis</i>
lovely fairy-wren	<i>Malurus amabilis</i>
purple-crowned fairy-wren	<i>Malurus coronatus</i>
red-winged fairywren	<i>Malurus elegans</i>
variegated fairy-wren	<i>Malurus lamberti</i>
white-winged fairy-wren	<i>Malurus leucopterus</i>
red-backed fairy-wren	<i>Malurus melanocephalus</i>
blue-breasted fairy-wren	<i>Malurus pulcherrimus</i>
noisy miner	<i>Manorina melanocephala</i>
hooded robin	<i>Melanodryas cucullata</i>
lewin's honeyeater	<i>Meliphaga lewinii</i>
white-naped honeyeater	<i>Melithreptus lunatus</i>
rainbow bee-eater	<i>Merops ornatus</i>
little pied cormorant	<i>Microcarbo melanoleucos</i>
scarlet honeyeater	<i>Myzomela sanguinolenta</i>
olive-backed sunbird	<i>Nectarinia jugularis</i>
cotton pygmy-goose	<i>Nettapus coromandelianus</i>
green pygmy-goose	<i>Nettapus pulchellus</i>
olive-backed oriole	<i>Oriolus sagittatus</i>
golden whistler	<i>Pachycephala pectoralis</i>
rufous whistler	<i>Pachycephala rufiventris</i>
spotted pardalote	<i>Pardalotus punctatus</i>
striated pardalote	<i>Pardalotus striatus</i>
scarlet robin	<i>Petroica boodang</i>
red-capped robin	<i>Petroica goodenovii</i>
flame robin	<i>Petroica phoenicea</i>
little friarbird	<i>Philemon citreogularis</i>
noisy friarbird	<i>Philemon corniculatus</i>
white-cheeked honeyeater	<i>Phylidonyris niger</i>
New Holland honeyeater	<i>Phylidonyris novaehollandiae</i>
crescent honeyeater	<i>Phylidonyris pyrrhopterus</i>
rainbow pitta	<i>Pitta iris</i>
noisy pitta	<i>Pitta versicolor</i>
yellow-billed spoonbill	<i>Platalea flavipes</i>

royal spoonbill	<i>Platalea regia</i>
striped honeyeater	<i>Plectorhyncha lanceolata</i>
glossy ibis	<i>Plegadis falcinellus</i>
tawny frogmouth	<i>Podargus strigoides</i>
purple swampphen	<i>Porphyrio melanotus</i>
eastern whipbird	<i>Psophodes olivaceus</i>
wompoo fruit-dove	<i>Ptilinopus magnificus</i>
satin bowerbird	<i>Ptilonorhynchus violaceus</i>
white-plumed honeyeater	<i>Ptilotula penicillata</i>
yellow-throated scrubwren	<i>Sericornis citreogularis</i>
white-browed scrubwren	<i>Sericornis frontalis</i>
regent bowerbird	<i>Sericulus chrysocephalus</i>
freckled duck	<i>Stictonetta naevosa</i>
apostlebird	<i>Struthidea cinerea</i>
Australian white ibis	<i>Threskiornis molucca</i>
straw-necked ibis	<i>Threskiornis spinicollis</i>
forest kingfisher	<i>Todiramphus macleayii</i>
red-backed kingfisher	<i>Todiramphus pyrrhopygia</i>
sacred Kingfisher	<i>Todiramphus sanctus</i>
chestnut-backed button-quail	<i>Turnix castanotus</i>
masked lapwing	<i>Vanellus miles</i>
banded lapwing	<i>Vanellus tricolor</i>
8. Reptiles:	
The following reptiles are class 2 animals—	
Common name	Scientific name
Arafura file snake	<i>Acrochordus arafurae</i>
little file snake	<i>Acrochordus granulatus</i>
blackish blind snake	<i>Anilius nigrescens</i>
three-clawed worm-skink	<i>Anomalopus verreauxii</i>
coral snake	<i>Brachyuropsis australis</i>
white-crowned snake	<i>Cacophis harriettae</i>
dwarf crowned snake	<i>Cacophis krefftii</i>
golden-crowned snake	<i>Cacophis squamulosus</i>
red-tailed calyptotis	<i>Calyptotis ruficauda</i>
pig-nosed turtle	<i>Carettochelys insculpta</i>
chameleon gecko	<i>Carphodactylus laevis</i>
bockadam	<i>Cerberus australis</i>
sandstone long-necked turtle	<i>Chelodina burrungandjii</i>
flat-shelled snake-necked turtle	<i>Chelodina steindachneri</i>
chameleon dragon	<i>Chelosania brunnea</i>

frilled lizard	<i>Chlamydosaurus kingii</i>
dark bar-sided skink	<i>Concinnia martini</i>
ring-tailed dragon	<i>Ctenophorus caudicinctus</i>
black-collared dragon	<i>Ctenophorus clayi</i>
crested dragon	<i>Ctenophorus cristatus</i>
tawny dragon	<i>Ctenophorus decresii</i>
peninsula dragon	<i>Ctenophorus fionni</i>
mallee dragon	<i>Ctenophorus fordi</i>
military dragon	<i>Ctenophorus isolepis</i>
ornate dragon	<i>Ctenophorus ornatus</i>
western netted dragon	<i>Ctenophorus reticulatus</i>
claypan dragon	<i>Ctenophorus salinarum</i>
red-barred dragon	<i>Ctenophorus vadrappa</i>
Leonhardi's ctenotus	<i>Ctenotus leonhardii</i>
leopard ctenotus	<i>Ctenotus pantherinus</i>
stony-soil ctenotus	<i>Ctenotus saxatilis</i>
McDonald's ring-tailed gecko	<i>Cyrtodactylus mcdonaldii</i>
ring-tailed gecko	<i>Cyrtodactylus tuberculatus</i>
striped legless lizard	<i>Delma impar</i>
patternless delma	<i>Delma inornata</i>
yellow-faced whip snake	<i>Demansia psammophis</i>
northern tree snake	<i>Dendrelaphis calligastra</i>
De Vis' banded snake	<i>Denisonia devisi</i>
ornamental snake	<i>Denisonia maculata</i>
eastern deserts fat-tailed gecko	<i>Diplodactylus ameyi</i>
Gulf fat-tailed gecko	<i>Diplodactylus barraganae</i>
variable fat-tailed gecko	<i>Diplodactylus conspicillatus</i>
helmeted gecko	<i>Diplodactylus galeatus</i>
wheat-belt stone gecko	<i>Diplodactylus granariensis</i>
desert fat-tailed gecko	<i>Diplodactylus laevis</i>
eastern fat-tailed gecko	<i>Diplodactylus platyurus</i>
robust two-line dragon	<i>Diporiphora bennettii</i>
two-lined dragon	<i>Diporiphora bilineata</i>
yellow-sided two-lined dragon	<i>Diporiphora magna</i>
canegrass dragon	<i>Diporiphora winneckeii</i>
white-lipped snake	<i>Drysdalia coronoides</i>
mustard-bellied snake	<i>Drysdalia rhodogaster</i>
bardick	<i>Echiopsis curta</i>
western Pilbara spiny-tailed skink	<i>Egernia cygnitos</i>
pygmy spiny-tailed skink	<i>Egernia depressa</i>
central Pilbara spiny-tailed skink	<i>Egernia eos</i>
eastern Pilbara spiny-tailed skink	<i>Egernia ephissolus</i>

eastern crevice-skink	<i>Egernia mcphreei</i>
yakka skink	<i>Egernia rugosa</i>
southern snapping turtle	<i>Elseya albagula</i>
Irwin's turtle	<i>Elseya irwini</i>
Gulf snapping turtle	<i>Elseya lavarackorum</i>
red-flushed river turtle	<i>Emydura subglobosa</i>
northern yellow-faced turtle	<i>Emydura tanybaraga</i>
northern red-faced turtle	<i>Emydura victoriae</i>
southern water-skink	<i>Eulamprus tympanum</i>
red-naped snake	<i>Furina diadema</i>
orange-naped snake	<i>Furina ornata</i>
centralian dtella	<i>Gehyra montium</i>
robust dtella	<i>gehyra robusta</i>
prickly forest skink	<i>Gnypetoscincus queenslandiae</i>
black-bellied swamp snake	<i>Hemiaspis signata</i>
Tryon's skink	<i>Karma tryoni</i>
white-lipped python	<i>Leiopython hoserai/albertisii</i>
mourning gecko	<i>Lepidodactylus lugubris</i>
Coen rainbow-skink	<i>Liburnascincus coensis</i>
centralian Ranges rock-skink	<i>Liopholis margaretae</i>
south-western rock-skink	<i>Liopholis pulchra</i>
nocturnal desert-skink	<i>Liopholis striata</i>
Boyd's forest dragon	<i>Lophosaurus boydii</i>
Byrne's gecko	<i>Lucasium byrnei</i>
crowned gecko	<i>Lucasium stenodactylum</i>
Oenpelli rock python	<i>Morelia oenpelliensis</i>
dotted velvet gecko	<i>Oedura gemmata</i>
little whip snake	<i>Parasuta flagellum</i>
spectacled hooded snake	<i>Parasuta spectabilis</i>
Kimberley bearded dragon	<i>Pogona microlepidota</i>
Macleay's water snake	<i>Pseudoferania polylepis</i>
western giant cave gecko	<i>Pseudothecadactylus cavaticus</i>
giant cave gecko	<i>Pseudothecadactylus lindneri</i>
Fitzroy River turtle	<i>Rheodytes leukops</i>
beaked gecko	<i>Rhynchoedura ornata</i>
granite leaf-tailed gecko	<i>Saltuarius wyberba</i>
jewelled gecko	<i>Strophurus elderi</i>
western spiny-tailed gecko	<i>Strophurus spinigerus</i>
western blue-tongued lizard	<i>Tiliqua occipitalis</i>
centralian earless dragon	<i>Tympanocryptis centralis</i>
pebble dragon	<i>Tympanocryptis cephalus</i>
gibber earless dragon	<i>Tympanocryptis intima</i>

lined earless dragon	<i>Tympanocryptis lineata</i>
Eyrean earless dragon	<i>Tympanocryptis tetraporophora</i>
border thick-tailed gecko	<i>Uvidicolus sphyrurus</i>
black-spotted ridge-tailed monitor	<i>Varanus baritji</i>
short-tailed pygmy monitor	<i>Varanus brevicauda</i>
Bush's monitor	<i>Varanus bushi</i>
line-tailed pygmy monitor	<i>Varanus caudolineatus</i>
rusty desert monitor	<i>Varanus eremius</i>
perentie	<i>Varanus giganteus</i>
Kimberley rock monitor	<i>Varanus glauerti</i>
long-tailed rock monitor	<i>Varanus glebopalma</i>
Southern Pilbara rock monitor	<i>Varanus hammersleyensis</i>
mangrove monitor	<i>Varanus indicus</i>
pygmy rock monitor	<i>Varanus kingorum</i>
Mitchell's water monitor	<i>Varanus mitchelli</i>
yellow-spotted monitor	<i>Varanus panoptes</i>
northern Pilbara rock monitor	<i>Varanus pilbarensis</i>
emerald monitor	<i>Varanus prasinus</i>
northern ridge-tailed monitor	<i>Varanus primordius</i>
Rosenberg's goanna	<i>Varanus rosenbergi</i>
rusty monitor	<i>Varanus semiremex</i>
Spencer's monitor	<i>Varanus spenceri</i>
lace monitor	<i>Varanus varius</i>
bandy-bandy	<i>Vermicella annulata</i>
Bell's turtle	<i>Wollumbinia belli</i>
The following reptiles are class 2 dangerous animals—	
Common name	Scientific name
death adders	<i>Acanthophsis spp.</i>
copperheads	<i>Austrelaps spp.</i>
eastern small-eyed snake	<i>Cryptophis nigrescens</i>
greater black whipsnake	<i>Demansia papuensis</i>
lesser black whipsnake	<i>Demansia vestigiata</i>
broad-headed snakes	<i>Hoplocephalus spp.</i>
tiger snakes	<i>Notechis spp.</i>
taipans	<i>Oxyuranus spp.</i>
black snakes	<i>Pseudechis spp.</i>
brown snakes	<i>Pseudonaja spp.</i>
myall snake	<i>Suta suta</i>
rough scaled snake	<i>Tropidechis carinatus</i>

FARM	<p>The following protected animals are farm animals—</p> <ul style="list-style-type: none"> (a) a reptile of the family Elapidae; (b) birdwing butterfly (<i>Ornithoptera sp.</i>); (c) Ulysses butterfly (<i>Papilio ulysses</i>); (d) emu (<i>Dromaius novaehollandiae</i>); (e) estuarine crocodile (<i>Crocodylus porosus</i>); (f) freshwater crocodile (<i>Crocodylus johnstoni</i>);
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Attachment 6: Examples under final licence framework – new licence types and record-keeping requirements

Examples under proposed new framework

- A person currently *keeping* captive-bred budgerigars, rainbow lorikeets or galahs can continue to *keep*, *breed*, and *trade* them without a licence as they are all *exempt animals*.
- A person currently *keeping* captive-bred plum-headed finches and red-browed finches will no longer be required to obtain an \$81.35 *recreational wildlife licence*. They can continue to *keep*, *breed*, and *trade* them without a licence as they are now *exempt animals*.
- A person currently *keeping* five children's pythons (*Antaresia childreni*) and three eastern blue-tongue lizard (*Tiliqua scincoides*), who does not wish to *breed* or *trade* their animals, will transition from a \$81.35 *recreational wildlife licence* to a \$59.20 *standard licence* as they are all class 1 animals. They will *record* details of their animals (e.g. *movement*, *death*) in either:
 - the online *record-keeping* system, or if hardship;
 - their hardcopy *record book*, and annually submit this *record*.
- A person currently *keeping* four children's pythons (*Antaresia childreni*), who does wish to *breed* or *trade* their animals, but *keep* no more than 50 animals at any given time, will transition from a \$81.35 *recreational wildlife licence* to a \$316.90 *specialised licence*, as although they are class 1 animals they are seeking to *breed* and *trade*. They will *record* details of their animals (e.g. *birth*, *death*, *sale*, *movement*) in the online *record-keeping* system, or if hardship, their hardcopy *record book*, and annually submit this *record*.
- A person *keeping* one taipan (*Oxyuranus species*) will transition from a \$325.75 recreational (restricted) licence to a \$316.90 *specialised licence* as this is a class 2 dangerous animal. They will *record* details of their animals (e.g. *movement*, *death*) in the online *record-keeping* system, or if hardship, their hardcopy *record book*, and annually submit this *record*.
- A person currently *keeping* two green pythons (*Morelia viridis*), now a class 1 animal, will transition from a \$325.75 recreational (restricted) licence to a \$59.20 *standard licence*. They will *record* details of their animals (e.g. *movement*, *death*) in the online *record-keeping* system.
- A person currently *keeping* two eclectus parrots (*Australian subspecies*) and wanting to *keep* two red-backed fairy-wrens (*Malarus melanocephala*), now all class 2 animals, will transition from a \$325.75 recreational (restricted) licence to a \$316.90 *specialised licence*. They will *record* details of their animals (e.g. *movement*, *death*) in the online *record-keeping* system, or if hardship, their hardcopy *record book*, and annually submit this *record*.
- A person currently *keeping* twenty children's pythons (*Antaresia childreni*) and ten eastern blue-tongue lizards (*Tiliqua scincoides*), will transition from a \$81.35 *recreational wildlife licence* to a \$316.90 *specialised licence*, as they are *keeping* more than 10, but less than 50 class 1 animals. If they intend to *breed* these animals and are likely to exceed 50 animals, they will transition to a \$682.90 *advanced licence*. They will be provided with the unlimited ability to *breed* and *trade* their animals, and will *record* details of their animals (e.g. *birth*, *death*, *sale*, *movement*) in the online *record-keeping* system, or if hardship, their hardcopy *record book*, and annually submit this *record*.
- All pet shops will transition from a *commercial wildlife licence* ranging between a \$31.20 and \$2,410 licence fee to a \$682.90 *advanced licence (5 year term)*. They will be permitted to *keep*, *breed*, and *trade* all class 1 and class 2 animals, and will *record* details of their animals (e.g. *birth*, *death*, *sale*, *movement*) in the online *record-keeping* system.

Attachment 7: Dangerous snakes policy

The current approach limiting possession to 20 in highly urbanised areas and 80 outside these areas with no graduation in the scale of dangerous snakes permitted, will be replaced.

In relation to maximum limits of dangerous snakes in this final proposal, under a *specialised licence* a person will be permitted to have a maximum limit of 50 vertebrates – meaning at most 50 dangerous snakes if they have no other animals. Under an *advanced licence* they will be permitted to have a maximum limit of 50 dangerous snakes by default, unless they can demonstrate to the Chief Executive that they can reasonably and safely care for more.

The proposed approach for which dangerous snakes can be kept has also been reformed - aligning more to the approach in New South Wales. Under this approach, a person is permitted to *keep* more dangerous snakes as their experience increases.

Under the new approach an applicant:

1. Must still be at least 18 years old in order to be permitted to *keep* dangerous snakes;
2. Must have held a *standard*, *specialised*, or *advanced licence* without authorisation for dangerous snakes (or equivalent under Queensland's superseded framework or another jurisdiction) for a minimum of 1 year;
3. After 1 year of holding a *standard*⁵, *specialised*, or *advanced licence* without authorisation for dangerous snakes, will be permitted to *keep* first-level dangerous snakes under a *specialised* or *advanced licence*. The dangerous animals permitted will be limited to:

First-level dangerous snakes

- *Pseudechis porphyriacus* red-bellied black snake
- *Pseudechis guttatus* spotted black snake

4. Will be permitted, after 1 year of being both licenced to *keep* first-level dangerous snakes and *keeping* first-level dangerous snakes, to upgrade to second-level dangerous animals. The dangerous animals permitted will be limited to:

Second-level dangerous snakes

- *Demansia papuensis* greater black whipsnake
- *Demansia vestigiata* lesser black whipsnake
- *Hoplocephalus spp.* broad-headed snakes
- *Acanthophis spp.* death adders
- *Austrelaps spp.* copperheads
- *Cryptophis nigrescens* eastern small-eyed snake
- *Notechis spp.* tiger snakes
- *Pseudechis spp.* black snakes (other than first-level dangerous snakes)
- *Suta suta* myall snake

5. Will be permitted, after 1 year of being both licenced to *keep* second-level dangerous snakes and *keeping* second-level dangerous snakes, to upgrade to all dangerous snakes. The additional dangerous animals permitted will be limited to:

Third-level dangerous snakes

- *Oxyuranus spp.* taipans
- *Pseudonaja spp.* brown snakes
- *Tropidechis carinatus* rough-scaled snake

Attachment 9: Financial analysis of final licence framework

Background and assumptions for licencing framework

An analysis of the assumptions and costings used for the analysis of the current situation and the proposed licence fees for the standard, specialised and advances licences is provided below.

In order to determine a suitable new licencing framework, an analysis was required of the following elements of the current framework:

- current number of licences and their fees;
- current revenue generated from licence fees;
- animal-keeping practices of recreational licence holders;
- cost to the department for assessing licence applications; and
- costs to the department for undertaking compliance activities on licence requirements.

As the Department of Environment and Science (the department) does not have robust data for all these elements, to undertake this analysis, information based on a sample size of applications was provided by departmental officers.

Current licencing framework: Status quo

LICENCE FEES

The below tables specify the fee structure of the current licencing framework. These tables show the fees for each type of licence and the types of animals than can be kept. The fees for commercial licences are provided in Table 1, whilst fees for recreational licences are in Table 2.

For commercial licences (Table 1), an average fee amount was determined for each of the three licence terms. Averages were calculated because, although the department has *records* of the total number of licences issued, the department does not have data on the category or duration of each licence that has been issued. The average fee of \$2,176 for the >1year licence is used for estimating the new fees for industry because it is assumed that most commercial licences would be operating under this licence period for operational convenience.

Table 1: cost for commercial licence categories

COMMERCIAL LICENCE - CURRENT FEE (\$)			
Animal	1 month	1 month - 1 year	1 - 3 years
birds	141.20	703.00	2,012.00
reptiles	141.20	703.00	2,012.00
birds & reptiles	224.30	869.00	2,477.00
scorpions & spiders	32.95	166.40	466.90
scorpions & spiders & reptiles	159.70	729.00	2,083.00
scorpions & spiders & birds	159.70	729.00	2,083.00
Dead animal (non-macropod)	141.20	703.00	2,012.00
Everything	243.30	890.00	2,550.00
AVERAGE COST	172.94	760.86	2,175.57

Table 2: Cost for recreational licence categories

RECREATIONAL LICENCE - CURRENT FEE (\$)	
Licence category	5yrs
Standard licence	83.15
International licence	101.50
Restricted licence	332.95
International & restricted licence	351.30

NUMBER OF LICENCES ISSUED

Table 3 identifies the average number of licences issued per year, based on data that has been extracted from the department's licencing *record*-keeping system from 2012 - 2017.

Table 3: Average licences issued per year

AVERAGE NUMBER OF LICENCES ISSUED BY EHP PER YEAR							
Financial year	Number of recreational wildlife licences (RWL)				Number of commercial wildlife licences (CWL)		
	Total	Standard	Restricted	International	Total	< 1 year	1-3 years
2012 - 2013	8,396	7,892	168	336	121	6	115
2013 - 2014	7,780	7,313	156	311	121	6	115
2014 - 2015	8,123	7,636	162	325	87	4	83
2015 - 2016	7,375	6,933	148	295	77	4	73
2016 - 2017	6,816	6,407	136	273	100	5	95
Average per year	7,698	7,236	154	308	101	5	96

REVENUE FROM LICENCES ISSUED

The overall average revenue from licence fees is identified in Table 4. This is based on the average number of licences issued, as per Table 3, and the licence fees from Table 1 (cost for commercial licence categories) and Table 2 (cost for recreational licence categories).

Table 4: Average revenue from licence fees per year

Financial year	RWL Revenue		
	RWL (standard)	RWL (restricted)	RWL (international)
2012 - 2013	\$0.646M	\$0.072M	\$0.043M
2013 - 2014	\$0.598M	\$0.067M	\$0.039M
2014 - 2015	\$0.625M	\$0.069M	\$0.041M
2015 - 2016	\$0.567M	\$0.063M	\$0.037M
2016 - 2017	\$0.524M	\$0.058M	\$0.035M
Average per year	\$0.592M	\$0.066M	\$0.039M
SUB TOTAL	Total average RWL revenue		\$0.697M
Financial year	CWL Revenue		
	CWL (< 1 year)	CWL (1-3 years)	
2012 - 2013	\$0.005M	\$0.250M	
2013 - 2014	\$0.005M	\$0.250M	
2014 - 2015	\$0.003M	\$0.180M	
2015 - 2016	\$0.003M	\$0.159M	
2016 - 2017	\$0.004M	\$0.207M	
Average per year	\$0.004M	\$0.209M	
SUB TOTAL	Total average CWL revenue		\$0.213M
TOTAL AVERAGE REVENUE	TOTAL RWL + TOTAL CWL		\$0.910M

ANIMAL KEEPING ESTIMATES

The department has limited data on the animal-keeping practices of recreational licence holders. The data below was used to make assumptions about the number and type of animals that recreational licence holders are currently keeping. These assumptions form the basis of estimates of the current recreational licence holders that will align with and transition across to *standard*, *specialised* and *advanced* licences.

Departmental officers provided estimates based on:

- information the department receives through mandatory reporting – such as *movement advices* that *record* the type of animals that are moved by licence holders from one place to another;
- audits undertaken of licence holders' *record* books; and
- large-scale coordinated compliance and enforcement programs – such as programs through the Australian Criminal Intelligence Commission (formerly the Australian Crime Commission).

Based on this data, it is assumed that in relation to *recreational wildlife licence* holders:

- 97.5% keep commercially available, easy to keep, non-dangerous animals;
- 2.5% keep restricted (e.g. dangerous) animals;
- 85% keep five animals or less;
- 5% keep more than five animals, but less than or equal to 10;
- 5% keep more than 10 animals, but less than or equal to 50; and
- 5% keep more than 50 animals.

CURRENT ESTIMATED ASSESSMENT COSTS

Table 5 identifies the estimated assessment costs for licences. These estimates are based on the number of hours departmental officers spend, on average, assessing each type of licence. Table 6 uses the data from Table 3 (average licences issued per year) and Table 5 (average assessment time and cost per licence) to identify the total estimated assessment cost to the department per annum.

Table 5: average assessment time and cost per licence

Licence type	Assessment hours	Cost (at \$50/hr)
Recreational – standard	0.5	\$25.00
Recreational – restricted	4	\$200.00
Commercial licence	8	\$400.00

Table 6: total estimated assessment cost per annum

Licence type	No. licences/yr	TOTAL COSTS (\$)
Recreational – standard	7,506	\$0.188M
Recreational – restricted	192	\$0.039M
Commercial licences	101	\$0.040M
TOTAL COST	--	\$0.267M

Note: For the purposes of the analysis the international licences have been included within the Recreational – standard category.

CURRENT ESTIMATED COMPLIANCE COSTS

Compliance effort has been separated into three main activities to estimate compliance costs. These are:

- desktop assessments;
- on-site inspections; and
- investigation and litigation.

Under the current compliance-management framework the majority of work undertaken is re-active, with very limited capacity to undertake a pro-active program.

Tables 7 and 8 identify the cost to the department for undertaking compliance activities. These estimates are based on the number of hours departmental officers spend, on average, undertaking compliance activities for licences where compliance as well as non-compliance with licence conditions is found.

Table 7: Average cost of an audit requiring no further action

NO FURTHER ACTION REQUIRED (50% of audits)				
Activity	Hours	FTE	Total hrs (hrs x FTE)	COST (assuming average salary of \$50/hour)
Average time taken for 85% of licence keeping < 5 animals				
DESKTOP ASSESSMENT				
Pre inspection assessment	3	1	3	\$150.00
ON-SITE INSPECTION				
inspection	4	2	8	\$400.00
Post inspection reporting	2	1	2	\$100.00
Senior delegate approval of audit results	2	1	2	\$100.00
TOTAL			15	\$750.00
Average time taken for 15% of licence keeping > 5 animals				
DESKTOP ASSESSMENT				
Pre inspection assessment	4	1	4	\$200.00
ON-SITE INSPECTION				
Inspection	6	2	12	\$600.00
Post inspection reporting	2	1	2	\$100.00
Senior delegate approval of audit results	2	1	2	\$100.00
TOTAL			20	\$1,000.00

Table 8: Average cost of an audit requiring further action

COMPLIANCE ACTION REQUIRED (50% of audits)				
Activity	Hours	FTE	Total hrs (hrs x FTE)	COST (assuming average salary of \$50/hour)
Average time taken for 85% of licence keeping < 5 animals				
DESKTOP ASSESSMENT				
Pre inspection assessment	3	1	3	\$150.00
ON-SITE INSPECTION				
Inspection	4	2	8	\$400.00
Post inspection reporting including drafting of formal warning or offence response	10	1	10	\$500.00
Senior delegate approval of audit results and issuing of formal warning or offence	2	1	2	\$100.00
TOTAL			23	\$1,150.00
Average time taken for 15% of licence keeping > 5 animals				
DESKTOP ASSESSMENT				
Pre inspection assessment	4	1	4	\$200.00
ON-SITE INSPECTION				
Inspection	6	2	12	\$600.00
Post inspection reporting including drafting of formal warning or offence response	20	1	20	\$1000.00
Senior delegate approval of audit results and issuing of formal warning or offence	3	1	3	\$150.00
TOTAL			39	\$1,950.00
INVESTIGATION & LITIGATION				
Referral to EHP Investigation Unit	152*	-	152	\$7,596.00
TOTAL			152	\$7,596.00

*The average time to complete an investigation based on 4 case studies in 2015/16.

This approach costs the department approximately \$0.57 million per annum, and allows the physical inspection of approximately 300 licence holders per year, full administration of *movement advices* and returns and 100% check of online licences.

Of the 300 audits, based on DES data:

- 50% are found to be compliant;
- 50% are required to be further investigated; and
- four audits are referred to the department's Investigation Unit for further examination.

Using these estimates and the cost per audit identified in Tables 7 (average cost of an audit requiring no compliance action) and 8 (average cost of an audit requiring compliance action), Table 9 identifies the average total cost for the current compliance framework. Using these figures, there is an average compliance cost (excluding investigation and litigation) of \$1,030.00 per inspection. The total cost including investigation and litigation is \$0.6M.

Table 9: Average total compliance cost per year

Audit type	\$/AUDIT	No./year	TOTAL (\$)
Administrative review – analysis of advices/returns	16.70	15600	\$0.261M
Compliant inspections (85% of licences)	750.00	127	\$0.096M
Compliant inspections (15% of licence)	1000.00	23	\$0.022M
Require further investigation (85% of licences)	1150.00	127	\$0.147M
Require further investigation (15% of licences)	1950.00	23	\$0.044M
Sub-total			\$0.570M
Investigation & litigation referrals	7596.00	4	\$0.030M
TOTAL COST PER YEAR (CURRENT ANNUAL COMPLIANCE)			\$0.600M

SUMMARY FOR STATUS QUO

Table 10 summarises the above information.

Table 10: Summary of status quo revenue and costs

Annual average fee revenue	Annual average assessment cost	Annual average compliance cost	Total annual average cost	Difference (revenue less cost to department)
\$0.910M	\$0.267M	\$0.600M	\$0.867M	\$0.043M

Proposed licencing framework: Variations between Consultation RIS and Decision RIS

There are a number of commonalities across status quo and the proposed option that form the basis for how the fees for the Consultation RIS and Decision RIS were determined. The total number of licences, and the assessment and compliance costs per licence is the same across all options.

The total assessment and compliance costs for the Consultation RIS and Decision RIS however, will change based on the number of licences that will transition across to each of the new licence types for the two RIS scenarios for the different *standard*, *specialised* and *advanced licence* configurations.

NUMBER OF LICENCES ISSUED

The number of *standard*, *specialised* and *advanced* licences for the RIS scenarios is dependent on the limits imposed on each licence type:

- Consultation RIS limits –
 - *standard licence* – a maximum of five class 1 animals may be kept
 - *specialised licence* – a maximum of five animals may be kept, comprised of any combination of class 1 and class 2 animals
 - *advanced licence* – no animal limits
- Decision RIS limits –
 - *standard licence* – a maximum of 10 class 1 animals may be kept
 - *specialised licence* – a maximum of 50 animals may be kept, comprised of any combination of class 1 and class 2 animals
 - *advanced licence* – no animal limits

Table 11 identifies the projected average number of licences issued per annum that will be distributed across the proposed licence types for each RIS scenario. These figures are based on the animal keeping assumptions outlined above and data from Table 3 (average licences issued per year).

Table 11: Projected number of licences under the RIS scenarios

Licence type	Consultation RIS	Decision RIS
	Number of licences	Number of licences
Standard	5,889	6,720
Specialised	654	593
Advanced	1,256	486
TOTAL	7,799	7,799

ESTIMATED ASSESSMENT COSTS

The estimated assessment costs for a *standard*, *specialised*, and *advanced* licences are consistent across the two RIS scenarios. This is because the time and effort for the department to assess individual licence applications will remain the same regardless of the limits on the number and types of animals that can be kept under a *standard*, *specialised* or *advanced* licence. These costs are identified in Table 12 below. They are based on data from Table 5 (average assessment time and cost per licence), adjusted to the new proposed licence categories.

An additional 0.5 hours has been added to *standard* licences compared to the assessment costs of the current framework (status quo), to undertake an annual administrative review of keeping returns and *movement advices*. This cost does not apply to *specialised* and *advanced* licences given the mandatory requirement to use the department's *online system* which will automatically check and validate transactions such as *movement advices*.

Table 12: Average assessment time and cost per licence

Licence type	Assessment hours	Cost (at \$50/hr)
Standard	1	\$50.00
Specialised	4	\$200.00
Advanced	8	\$400.00

The total estimated assessment cost to government varies under the two scenarios because the number of these licences vary depending upon the RIS scenario limits. The varying costs are identified in Table 13, using the data from Table 11 (projected number of licences under the RIS scenarios) and Table 12 (average assessment time and cost per licence).

Table 13: Total estimated assessment cost per annum

Licence type	Consultation RIS		Decision RIS	
	Number of licences	Cost (\$)	Number of licences	Cost (\$)
Standard	5,889	\$0.294M	6720	\$0.336M
Specialised	654	\$0.131M	593	\$0.119M
Advanced	1,256	\$0.502M	486	\$0.194M
TOTAL	7,799	\$0.927M	7799	\$0.649M

COMPLIANCE MONITORING & INVESTIGATION COST ASSUMPTIONS

Based on the information in Table 7 (average cost of an audit requiring no compliance action) and Table 8 (average cost of an audit requiring further action), an estimate of the compliance cost for a compliant licence is

\$150.00 – *standard*, \$950.00 – *specialised*, and \$1,050.00 – *advanced*. When a desktop assessment or on-site inspection detects a non-compliant licence, the cost to the agency is \$1,300.00 – *standard*, \$1,400.00 – *specialised*, and \$1,950.00 – *advanced*. Table 14 provides a summary of the compliance costings for each proposed licence type.

Table 14: Average cost of audit for each licence type

ADVANCED LICENCE – NO FURTHER INVESTIGATION			
Activity	Hours	FTE	Total hrs (hrs x FTE)
Pre inspection audit	4	1	4
Inspection	6	2	12
Post inspection audit	2	1	2
SR approval	3	1	3
Total			21
COST (assuming average salary of \$50/hour)			1,050.00
ADVANCED LICENCE – FURTHER INVESTIGATION REQUIRED			
Activity	Hours	FTE	Total hrs (hrs x FTE)
Pre inspection audit	4	1	4
Inspection	6	2	12
Post inspection audit	12	1	12
ABR/PIN Letter	8	1	8
SR approval	3	1	3
Total			39
COST (assuming average salary of \$50/hour)			1,950.00
SPECIALISED LICENCE – NO FURTHER INVESTIGATION REQUIRED			
Activity	Hours	FTE	Total hrs (hrs x FTE)
Pre inspection audit	3	1	3
Inspection	6	2	12
Post inspection audit	2	1	2
SR approval	2	1	2
Total			19
COST (assuming average salary of \$50/hour)			950.00
SPECIALISED LICENCE – FURTHER INVESTIGATION REQUIRED (SPECIALISED LICENCES)			
Activity	Hours	FTE	Total hrs (hrs x FTE)
Pre inspection audit	3	1	3
Inspection	6	2	12
Post inspection audit	6	1	6
ABR/PIN Letter	4	1	4
SR approval	3	1	3
Total			28
COST (assuming average salary of \$50/hour)			1,400.00
STANDARD LICENCE – NO FURTHER INVESTIGATION REQUIRED			
Activity	Hours	FTE	Total hrs (hrs x FTE)
Pre inspection audit	3	1	3
Total			3
COST (assuming average salary of \$50/hour)			150.00

STANDARD LICENCE – FURTHER INVESTIGATION REQUIRED			
Activity	Hours	FTE	Total hrs (hrs x FTE)
Pre inspection audit	3	1	3
Inspection	5	2	10
Post inspection audit	6	1	6
ABR/PIN Letter	4	1	4
SR approval	3	1	3
Total			26
COST (assuming average salary of \$50/hour)			1,300.00

Using the information provided in Table 8 (average cost of an audit requiring compliance action) and Table 9 (average total compliance cost per year), Table 15 estimates the annual cost of investigation and litigation referrals for each of the proposed scenarios. The investigation and litigation costs are based on the average number of licences expected to be issued each year and the average number of investigations requiring referral to litigation each year.

Table 15: Average cost of investigation and litigation (referral to DES Investigation Unit)

AVERAGE COST – INVESTIGATION & LITIGATION				
Average number of licences	Number requiring investigation	Average cost per investigation	Total Cost	Cost/licence
7,799	4	\$7,596.00	\$30,384.50	\$3.90

ESTIMATED COMPLIANCE COST

Under this option, all licences will be subject to a compliance check during the term of the licence.

The check will be either desk-top or field-based depending upon the licence type, as follows:

- an internal analysis will be undertaken on all online *standard licences*, and an on-site inspection will occur on approximately 2% of licences;
- an internal analysis will be undertaken on all *specialised licences*, and an on-site inspection will occur on approximately 10% of licences; and
- an internal analysis will be undertaken on all *advanced licences*, and an on-site inspection will occur on 15% of licences.

Using the estimated compliance costs from Table 7 (average cost of an audit requiring no compliance action and Table 8 (average cost of an audit requiring compliance action), and the licence numbers from Table 11, Table 16 identifies the estimated compliance cost (excluding investigation and litigation) to the department under the RIS scenarios.

Table 16: Total estimated compliance cost per annum

Licence type	Consultation RIS		Decision RIS	
	Number checked	Cost (\$)	Number checked	Cost (\$)
Standard	118	\$0.031M	135	\$0.035M
Specialised	65	\$0.074M	59	\$0.067M
Advanced	188	\$0.350M	73	\$0.136M
TOTAL	371	\$0.455M	267	\$0.238M

SUMMARY OF COSTS

Table 17 summarises the total costs to the department under the current and proposed RIS scenarios, based on the data in Table 13 (total estimated assessment cost per annum), Table 15 (average cost of investigation and litigation) and Table 16 (total estimated compliance cost per annum).

Table 17: Summary of costs under licencing frameworks

Scenario	Annual average assessment cost	Annual average compliance cost	Total cost
Status quo	\$0.267M	\$0.600M	\$0.867M
Consultation RIS	\$0.927M	\$0.485M	\$1.412M
Decision RIS	\$0.649M	\$0.268M	\$0.917M

PROPOSED FEES

In order to achieve cost recovery for the department's costs, the average annual assessment cost and average annual compliance cost must be divided by the projected number of *standard*, *specialised*, and *advanced licences*. As the costs are proportional to the number of licences, the proposed fee for *standard*, *specialised* and *advanced licences* is consistent across the RIS scenarios. For example, given the assumptions made in Table 9 (average total compliance cost per year) and Table 15 (average cost of investigation and litigation), the average advance licence fee is \$682.90.

The proposed fee is outlined in Table 18, whilst Table 19 identifies the total projected annual fee revenue each licence type under the RIS scenarios.

Table 18: Proposed licence fee

Licence type	Proposed fee
Standard	\$59.20
Specialised	\$316.90
Advanced	\$682.90

Table 19: Projected average fee revenue per annum

Consultation RIS			
Licence type	Number of licences	Fee per licence	Total revenue
Standard	5,889	\$59.20	\$0.348M
Specialised	654	\$316.90	\$0.207M
Advanced	1,256	\$682.90	\$0.857M
TOTAL	7,799	--	\$1.412M
Decision RIS			
Licence type	Number of licences	Fee per licence	Total revenue
Standard	6,720	\$59.20	\$0.397M
Specialised	593	\$316.90	\$0.188M
Advanced	486	\$682.90	\$0.332M
TOTAL	7,799	--	\$0.917M

SUMMARY

Table 20 summarises the overall costs and benefits of the current and proposed licencing frameworks.

Table 20: Summary of revenue and costs

Scenario	Annual average fee revenue	Annual average assessment cost	Annual average compliance cost	Total estimated cost	Difference (revenue less cost to department)
Status quo	\$0.890	\$0.267M	\$0.600M	\$0.867M	\$0.023M
Consultation RIS	\$1.412M	\$0.927M	\$0.485M	\$1.412M	Nil
Decision RIS	\$0.917M	\$0.649M	\$0.268M	\$0.917M	Nil

As the number of recreational licences transitioning to *standard*, *specialised* and *advanced* vary under the two RIS scenarios for the number of animals that can be kept, there will be varying total costs to the community and business under each scenario. The total estimated cost to the community and business for each projected licence transition is identified in Table 21.

Table 21: Projected licence transitions and cost to community and business

Licences that would be required to transition from 'Recreational (standard) Licence' to 'Standard Licence'							
Scenario	No. of licences/ year	Current \$/licence	Current cost to community (\$)	Proposed \$/licence	Saving \$/licence	Proposed cost to community (\$)	TOTAL SAVING FROM STATUS QUO
Consultation RIS	5889	83.15	0.489M	59.20	23.95	0.348M	\$0.141M
Decision RIS	6374	83.15	0.518M	59.20	23.95	0.377M	\$0.153M
Licences that would be required to transition from 'Recreational (standard) Licence' to 'Specialised Licence'							
Scenario	No. of licences/ year	Current \$/licence	Current cost to community (\$)	Proposed \$/licence	Extra \$/licence	Proposed cost to community (\$)	TOTAL EXTRA COST FROM STATUS QUO
Consultation RIS	262	83.15	0.022M	316.90	233.75	0.083M	\$0.061M
Decision RIS	391	83.15	0.033M	316.90	233.75	0.124M	\$0.091M
Licences that would be required to transition from 'Recreational (standard) Licence' to 'Advanced Licence'							
Scenario	No. of licences/ year	Current \$/licence	Current cost to community (\$)	Proposed \$/licence	Extra \$/licence	Proposed cost to community (\$)	TOTAL EXTRA COST FROM STATUS QUO
Consultation RIS	1085	83.15	0.090M	682.90	599.75	0.741M	\$0.651M
Decision RIS	356	83.15	0.030M	682.90	599.75	0.243M	\$0.213M
Licences that would be required to transition from 'Recreational (international) Licence' to 'Standard Licence'							
Scenario	No. of licences/ year	Current \$/licence	Current cost to community (\$)	Proposed \$/licence	Saving \$/licence	Proposed cost to community (\$)	TOTAL SAVING FROM STATUS QUO
Consultation RIS	Nil	--	--	--	--	--	--
Decision RIS	346	101.50	0.034M	59.20	42.30	0.020M	\$0.015M
Licences that would be required to transition from 'Recreational (international) Licence' to 'Specialised Licence'							
Scenario	No. of licences/ year	Current \$/licence	Current cost to community (\$)	Proposed \$/licence	Extra \$/licence	Proposed cost to community (\$)	TOTAL EXTRA COST FROM STATUS QUO

Consultation RIS	262	101.50	0.026M	316.90	215.40	0.083M	\$0.057M
Decision RIS	19	101.50	0.002M	316.90	215.40	0.006M	\$0.004M
Licences that would be required to transition from 'Recreational (international) Licence' to 'Advanced Licence'							
Scenario	No. of licences/ year	Current \$/licence	Current cost to community (\$)	Proposed \$/licence	Extra \$/licence	Proposed cost to community (\$)	TOTAL EXTRA COST FROM STATUS QUO
Consultation RIS	46	101.50	0.004M	682.90	581.40	0.031M	\$0.027M
Decision RIS	19	101.50	0.002M	682.90	581.40	0.013M	\$0.011M
Licences that would be required to transition from 'Recreational (restricted) Licence' to 'Specialised Licence'							
Scenario	No. of licences/ year	Current \$/licence	Current cost to community (\$)	Proposed \$/licence	Saving \$/licence	Proposed cost to community (\$)	TOTAL SAVING FROM STATUS QUO
Consultation RIS	131	342.13	0.045M	316.90	25.23	0.042M	\$0.003M
Decision RIS	183	342.13	0.063M	316.90	25.23	0.058M	\$0.005M
Licences that would be required to transition from 'Recreational (restricted) Licence' to 'Advanced Licence'							
Scenario	No. of licences/ year	Current \$/licence	Current cost to community (\$)	Proposed \$/licence	Extra \$/licence	Proposed cost to community (\$)	TOTAL EXTRA COST FROM STATUS QUO
Consultation RIS	23	342.13	0.008M	682.90	340.70	0.016M	\$0.008M
Decision RIS	10	342.13	0.003M	682.90	340.77	0.006M	\$0.003M
Licences that would be required to transition from 'Commercial Wildlife Licence' to 'Advanced Licence'							
Scenario	No. of licences/ year	Current \$/licence	Current cost to business (\$)	Proposed \$/licence	Saving \$/licence	Proposed cost to business (\$)	TOTAL SAVING FROM STATUS QUO
All scenarios	101	2175.57	0.215M	682.90	1492.67	0.069M	\$0.151M