

Mr Kevin Wilde
Chief of Staff
Minister for the Environment
New South Wales

17th October 2018

Dear Mr Wilde

Concerns Associated with a Recent Submission Relating to Native Mammal Keeping in NSW

The Mammal Society of NSW Inc (formerly Native Mammal Keepers of NSW Working Group) has recently learned that the Minister's Office has received a submission objecting to native mammals being considered as part of the current review of native animal licensing.

It is our understanding, that increased native mammal ownership in NSW is in jeopardy subject to the consideration of the Ministers Office following review of a submission lodged by wildlife rehabilitation and animal welfare organisations. We wish to highlight several issues with the actions and directions taken by the animal welfare sector until now regarding the current review process.

Firstly, many of these agencies were invited to take part in the consultation process, and several agencies have chosen not to participate thus far. We believe these organisations intend to claim they were unaware of potential changes to Mammal licensing in NSW, however a news article (<https://www.smh.com.au/environment/conservation/plan-to-allow-australian-native-animals-as-pets-20141220-12bany.html>) from late 2014 indicates that these organisations were acutely aware that as part of the review native mammal ownership was to be addressed. Further to this, Office of Environment and Heritage (OEH) staff previously informed us that several of the agencies were contacted and briefed about potential changes to mammal licensing early during the review process. One major organisation, The Wildlife Information, Rescue and Education Service Inc. (WIRES), who we have been informed are a key group involved in the submission have failed to engage with any part of the public review process even though they have been aware of what has been occurring. This includes failing to provide a submission in response to the OEH issued discussion document, failing to attend any of the stakeholder meetings and failing to try and engage at any point with The Mammal Society of NSW Inc.

The Mammal Society of NSW Inc has openly participated in the consultation process and our submission has been made public for all other stakeholders to view, consider and discuss. We have put well over one-hundred volunteer hours into preparing submissions, collating interstate information, drafting a code of practice, preparing an implementation strategy and preparing species-specific risk assessments as part of the review. We wish to highlight our frustration that the welfare sector has in part circumnavigated the review, and as such has been provided with an unfair advantage. They have had ample time to review and refute our submission and in doing so provide your Office with unfairly developed counter-claims and responses. They have not participated fairly or ethically during consultation, and we should not be penalised due to their unwillingness to participate in a publicly-funded public review process. They should not be provided the opportunity or the capability of being able to reject our input and participation simply because they have a fundamental opposition to our position, especially given the failure of some groups (notably WIRES) to engage at previous stakeholder meetings.

With respect, we feel it is unfair for their submission to be given consideration in the review of native animal licensing. The report produced by the Independent Biodiversity Legislation Panel (released on 18th December 2014) which is the key driver of the review clearly states that reviews to wildlife licensing will include birds, reptiles and mammals. Given two species of native mammal are currently on license in NSW it is not unreasonable for such a review to include all native mammals as part of that process. The fact additional bird, frog and reptile species are being considered for inclusion to NSW species lists highlights that there is flexibility in the species lists and that yet again mammals are needlessly being treated as separate from other taxa. Our belief is the same respect should now be provided to native mammals and to the public wishing to keep them. The existence of an OEH internal policy has not prevented non-mammalian species from being included in the review process, and in the same

manner an internal OEH Policy cited on their website should not dictate the exclusion of mammals. A policy, which we have previously highlighted was drafted by one individual with no public consultation process.

We understand that the welfare submission has not yet been circulated and is currently unavailable while your Office seeks further feedback. As the animal welfare agencies are a key participant in this process, and will have an influence on the outcome, we believe it is a reasonable expectation that their objections and the submission containing them be provided to the other stakeholders. We would also like to have the ability to distribute the submission to the membership of the constituting organisations. Unsurprisingly, there is an overlap between those supporting changes to native mammal ownership and grass-roots wildlife carers – and we have come to believe that representatives of the wildlife rehabilitation industry do not accurately represent the views of their membership. Surveys that we conducted online indicated that ~25% of respondents supporting increased native mammal ownership had experience with wildlife rehabilitation. Whilst we acknowledge there was bias in our surveys, it still proves that a proportion of members within the wildlife rehabilitation sector are supportive of the change. The Mammal Society of NSW, Canary & Caged Bird Federation and the Herpetocultural Cooperative of NSW are fully supportive of pursuing changes to native mammal licensing. We also have support from the newly founded animal welfare organisation Animal Care Australia which has begun to work with the Department of Primary Industries (DPI) on policy relating to animal welfare. This represents a collective membership base of over 200,000 animal owners, including interstate native mammal keepers. We also wish to note that during the stakeholder engagement that native mammal specific animal welfare representation from DPI was supportive of an appropriately regulated increase to the native mammal species available in NSW. Historically, the native mammal debate in NSW has been one-sided and directly impacted by the absence of any pro-native mammal keeping organisations. As has become apparent in stakeholder meetings, previous reviews of native mammal keeping have had individual submissions provided by several experts in the relevant fields supporting the increased keeping of native mammals in NSW, but no sustained discussion. We are asking the Ministers Office to facilitate a conscientious, factual, and balanced debate. To date most information provided by the animal welfare sector has been anecdotal or ideological and representative of unsubstantiated theories. We have provided empirical evidence supporting our claims, we simply ask they do the same if they wish to participate meaningfully in the debate.

The Mammal Society of NSW seeks reassurance that any decisions made by the Ministers Office and subsequently OEH are provided after full consultation and made on sound scientific, ecological and evidence-based welfare principles.

We eagerly await your feedback and copy of the recent animal welfare submission.

Yours sincerely,

Mitchell Hodgson
President - The Mammal Society of NSW

“Dedicated to providing information and education regarding the keeping and breeding of native fauna in captivity and their conservation in the wild”

