

ZAA Submission: Review of the *Wildlife Act 1975*

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Editors: Melissa Broadway, Nicola Craddock & James Biggs

As a peak body, the Zoo and Aquarium Association Australasia (ZAA) represents the collective voice of the zoos, aquariums, sanctuaries and wildlife parks across Australasia that operate to the highest standards. Together, our members enhance the role of individual zoos and aquariums in conserving wildlife. Each year, they connect 22 million visitors with nature, educate 1.1 million students about wildlife, support 629 conservation programs and contribute over \$20 million to conservation. ZAA and its members lead over 100 breeding programs in support of conservation and community education. Additionally, we actively contribute to threatened species recovery around the world. As an association, ZAA brings its members together, facilitating shared knowledge and continuous improvement in conservation, welfare, biosecurity, science, research, social and community programs.

Our role in protecting wildlife and securing its future

Australia is renowned for its unique wildlife and extraordinary landscapes and is designated as one of only a handful of 'megadiverse' countries, owing to the uniqueness of its flora and fauna – found nowhere else on earth. These features are core to our identity, culturally significant to all Australians, important to the health of our environment and make a strong contribution to our economy. Australia's flora and fauna underpin an array of important ecologic, economic, scientific, cultural and spiritual values.

We find ourselves in what is now widely accepted as the Earth's sixth mass extinction – the first caused by anthropogenic disturbance - with Australia's mammalian extinction rate being the highest in the world. We are at a crucial point of our history, where if we do not act now to conserve nature and our wildlife, we risk losing much of our rich biodiversity.

Our member zoos and aquariums are at the forefront of the societal change. They work to educate and empower their visitors to make behavioural changes that can contribute to the protection of our wildlife. They have been instilling a love for our natural world through providing connections to different species from our backyard and from across the globe. Our zoos and aquariums are leading the way in conservation initiatives, channelling significant funding into programs that seek to protect species and ecosystems. They are dedicated to research initiatives that support best-practice for ongoing conservation projects and are also at the forefront of directly caring for sick and injured wildlife. As our zoos and aquariums are huge contributors to saving and protecting wildlife, they hope to be able to exist within a legislative framework that supports conservation and research work and

removes the barriers that are preventing collaboration, efficiency, progression and conservation outcomes.

ZAA's mission is to lead Australasian zoos and aquariums to work together to save wildlife. We welcome the opportunity to provide recommendations to update and strengthen the Act, and seek to ensure that:

- Native wildlife recovers, thrives, and is adequately protected;
- Traditional Ecological Knowledge and western science are valued equally and are respectfully and genuinely weaved into all decision-making processes to deliver mutually-beneficial outcomes for all stakeholders including wildlife;
- ZAA members continue to play an integral role in advocating for, and protecting the unique biodiversity of Victoria, whilst respectfully connecting people with wildlife.

The ZAA Submission

The ZAA response to the Review of the *Wildlife Act 1975* will focus on three key aspects:

1. The purpose of the Act and its relevance to contemporary views.
2. The supporting frameworks of management plans for threatened species, wildlife, and habitat.
3. Acknowledge the rights of Traditional Owners and Aboriginal Victorians as key decision-makers in relation to wildlife management and use, and prescribe processes that genuinely incorporate Traditional Owner voices in decision-making.

1 – The purpose of the Act and its relevance to contemporary views

The 2019/2020 bushfire season in Australia highlighted to the citizens of Victoria that our landscapes, species, and ecosystems are an important part of our identity, culture, and economy - and they are currently under greater risk than ever. The community response to the bushfires at a national level was enormous, with Australians donating more than 600 million to the various appeals. This depicts a community that has deep care for our wildlife and the environment. Alongside this evidence, there has also been a growing number of climate protests that have specifically demanded more action from the government. Australians are at the height of environmental concern, confirming that over the last 45 years (since the current *Wildlife Act 1975* was enacted) there has been a dramatic increase in science, environmental and ecological understanding, thereby increasing the value we place on the environment, which needs to be reflected in our legislation.

Purpose of the Act

The Act needs to reflect the community's contemporary expectations that the government will protect and care for our wildlife in the context of the evolving environmental landscape. To achieve this, the Act will require a full modernisation of the purpose of the Act. The purpose of the Act must outline targeted and clear objectives, which we recommend emulate the NSW *Biodiversity Conservation Act 2016* (section 1.3 Purpose of the Act). Key concepts that are lapse in the current Act, which are essential to include in the purpose are:

- Ensuring a forward-facing focus.
- Recognition of Traditional Owners and their Traditional Ecological Knowledge (TEK).
- Acknowledge, respect, and support of the unbroken connection to country held by the Traditional Owners.
- Value Traditional Owners as key decision makers for wildlife management.
- Acknowledging the current issues facing our wildlife, including climate change.
- Promotion of community engagement.
- Harmonisation of the management of ecosystems; habitat and wildlife.
- Prioritisation of a structured supporting framework for achievement of goals.
- Collaboration through both the public, private and not-for profit sectors.
- Application of a risk-based approach to regulation.
- Clear and concise definitions of terms which support logical management of wildlife.

The key concepts listed above are essential objectives, giving a clear guide as to the purpose and intention that the Act holds.

We do not recommend the inclusion of a 'duty of care' line as the Act must refrain from motherhood statements that are unmeasurable and hold no real legislative power. The objectives of the Act and its Regulations must be representative of the intent for 'duty of care', as well as an Explanatory Memorandum (EM) for submission alongside the revised Act. An EM could offer extended context behind the purpose, whilst keeping lofty statements out of the legislation itself. An EM can also explore a hierarchy of decisions (i.e., put care first except in the circumstances of X, Y, Z) and give context that would be otherwise excluded from the Act, which must remain a focused piece of legislation.

Definitions

The current definition of Wildlife is not all encompassing, nor does it represent clear categories in its exclusions.

The exclusion of some wildlife from the definition of wildlife is reductive. Following the 2019/2020 bushfire season a provisional list of animals requiring urgent management intervention was created. In this list there were 17 freshwater fish species listed, 10 of which are found in Victoria and 22 spiny crayfish species, 7 of which are found in Victoria (DAWE, 2020). These species were identified as requiring urgent conservation action with most of these species having experienced up to 30% of their natural habitat burned. Currently these species, like many others, do not qualify as 'wildlife' under the current Act. Whilst there may be a level of conservation provision for aquatic wildlife in the *Fisheries Act 1995*, they are at risk of being overlooked, underrepresented and lacking protection under state legislation, as many are also not currently listed as threatened under the *Flora and Fauna Guarantee Act 1988*. The *Wildlife Act 1975* exists in a complex network of interacting legislative Acts, Regulations and regulatory bodies. Throughout the review, ZAA recommends identifying these interactions, overlaps and inconsistencies between various legislations, to refine the system and to increase clarity and efficiency. Wildlife conservation and sustainable use would be best served in a single Act.

Currently some pest species such as deer are included in the definition of wildlife, whereas rabbits and foxes are not, which separates out the pest species in terms of cohesive and structured management. We call for a holistic view of the definition of wildlife, which is to refer to all animals within nature (ie excluding domestic and agricultural animals). Then allow for sub-categories of wildlife to be created which will inform structure and policy around the various management methods for the different wildlife i.e., threatened species, invasive species, and sacred species etc.

The separation of wildlife from habitat and ecosystems is also redundant and inefficient. Where operations surround individual animals or species without considering or applying management principles to the entire habitat or ecosystem, there will likely be overlap of similar work. Duplications or conflicting strategies does not support the most efficient, collaborative approach that is applied to conservation work globally (we discuss collaborative management plans below). The correction of this may require more linkages or adoption of the *Flora and Fauna Guarantee Act 1988*, as having the two separate forms of legislation is likely preventing these efficiencies.

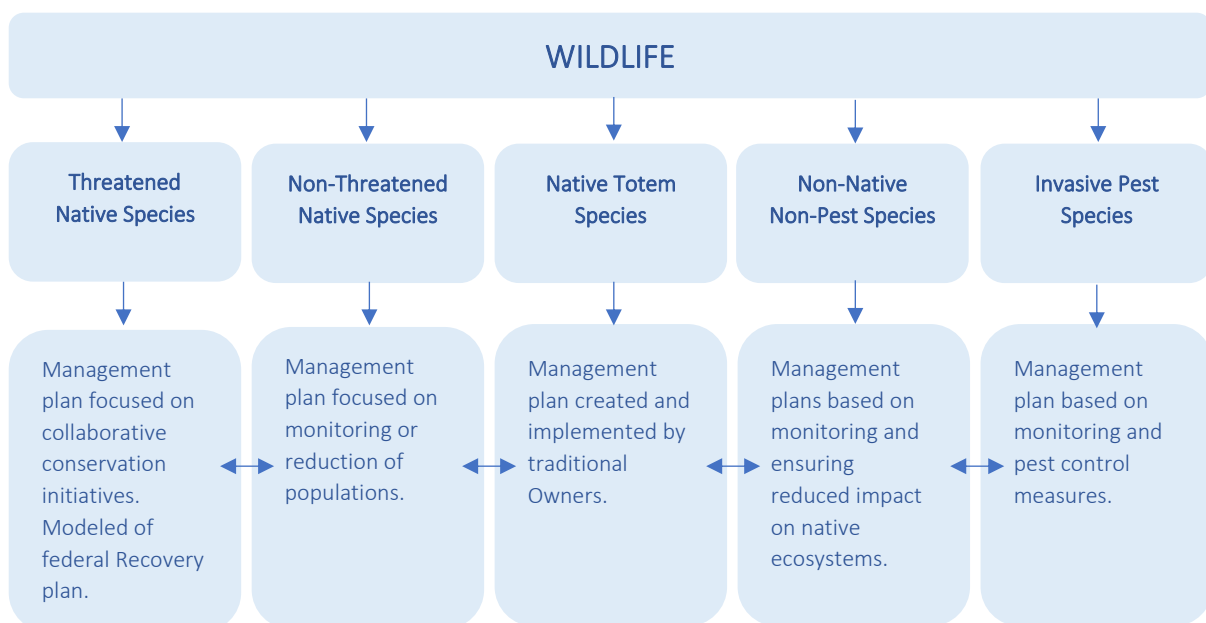
A definition once made must not be able to be changed by the governor. Exemptions in management of species that fall under certain definitions must be permitted as they are necessary, but by allowing continual changes to the root definition, this reduces the integrity of that definition and adds additional confusion and instability of the legislation.

2 - The supporting frameworks of management plans for threatened species, wildlife and habitats.

The Act currently lacks the appropriate mechanisms to allow for successful wildlife management. By having no current framework for species management or required reporting systems, there is no structure to support the contribution of multiple organisations to conservation in an effective manner, alongside the state government.

Management plans that follow conservation best-practice principles would provide a solid foundation for the structure of how species and ecosystem management should be documented and collaboratively implemented. Management plans must be required for all species that involve government or community intervention and must be created alongside a supportive framework that allows for assessing, planning, acting, and reporting. The management plans must contain concise direction on management actions and reporting requirements, appropriate and accountable stakeholders with information on the relationships of the parties and their roles in the plan (i.e. decision makers, advisors etc) and a planning prospectus with identified contributors to fund all management actions, or - in the absence of identified funding - a plan to support the delivery of those actions. Management plans must also consider Traditional Owner engagement and include Traditional Owners as key decision-making stakeholders. This is a well-rounded conservation system that has been supported by the International Union for the Conservation of Nature (IUCN) and the Conservation Planning Specialist Group (CPSG). Management plans, alongside the One Plan Approach - which supports the connection between in-situ and ex-situ conservation planning - can all be incorporated and promote a unified approach, targeting all stakeholder efforts towards the appropriate, most effective and collaboratively decided goals for a species.

Alongside a broader definition for wildlife mention in Section 1, we recommend further divisions into sub-categories which will allow animals to fall into different management groups, therefore allowing for a streamline of effective management plans. Templates of these management plans must be provided for each of the various sub-categories of wildlife and include objectives, SMART goals, performance indicators, Traditional Ecological Knowledge, external projects and research, species information, population information, monitoring protocols, land management planning, species-based resources etc. See the example diagram below.



The diagram above is a simplified example of how the management plans could be templated and streamlined. There will be specific species that diverge from the normal templates, however this system, if implemented, could provide the base for many more species to be included in the management and monitoring than has previously been considered or formally documented.

Modelled off the Federal system, external stakeholders in the public and private sector can be included in the formation of the management plans, allowing for expertise outside of the government frameworks to be incorporated. The inclusion of stakeholders in species management planning, ensures cohesive adoption of the plan across all the organisations involved in its development, resulting in less overlap, reduced work required from the State Government and collaborative engagement.

Management frameworks also provide an opportunity to support the permit and licensing systems. A management framework would allow for clear identification of evolving requirements for wildlife conservation, and inform agile processes such as licenses and permits to meet the overarching objectives of the Act. Licensing and permits may have additional grounds for approval if the license is being sought out to perform actions relating back to the species management plans. This would help to increase licensing efficiencies and strengthen the overall framework (i.e., authorisations relating to research must be required to prove this relates back to a management plan for a species where relevant).

Alongside the management plans for species, we would recommend that guidance/guidelines be provided for people that are caring for, or interacting with, wildlife. These guidelines can list the best-practice principles and support wildlife carers to achieve the best outcomes when dealing with sick, injured, or rehabilitating wildlife. These guidelines can be driven by experts in the field, such as zoo and aquarium institutions who hold vast amounts of information relating to ex-situ care and wildlife recovery. These guidelines may extend or incorporate the Code of Practice for the Welfare of Wildlife During Rehabilitation.

The definition of wildlife carers must be extended to include zoos, aquariums, rescue centres, care centres and rehabilitation facilities as these institutions are perfectly positioned to care for wildlife. By extending this definition this will allow the burden currently placed solely on wildlife carers to be shared, and this also places wildlife in the hands of highly experienced personnel. The goal for these institutions in their role as wildlife carers is to return wildlife to the wild where possible, with high consideration to animal welfare.

3 - Acknowledge the rights of Traditional Owners and Aboriginal Victorians as key decision-makers in relation to wildlife management and use, and prescribe processes that genuinely incorporate Traditional Owner voices in decision-making.

Traditional Owners have been caring for Country for tens of thousands of years. ZAA acknowledges that Traditional Owners have an unbroken connection to the land, ecosystems and wildlife, that must be supported through the legislative framework of the Act. This review must identify and consider the hurdles currently in place that hinder Traditional Owner engagement and management on country. Through consultation with Traditional Owners and Aboriginal Victorians, these identified hurdles can provide a basis for the Act to appropriately deliver structured processes that will support this engagement moving forward.

The Act must acknowledge that the Traditional Owners are key decision-making stakeholders in species and ecological management. Therefore, processes must be implemented so the voices and contributions of Aboriginal Victorians are incorporated into the decision making concerning the implementation of the Act and management actions to support wildlife. The co-designed structured process must promote Traditional Owners engagement in a respectful and meaningful way that reflects the interests and wishes of the Traditional Owners. The Act must also ensure that Traditional Ecological Knowledge and western science are equally valued and respected so that they may be weaved into all decision-making processes to deliver mutually beneficial outcomes for all stakeholders including wildlife.

Ongoing support of Traditional Owner management of country within state government frameworks must be prioritised. Long-term agreements for management of country must be established to allow for holistic healing of Country driven by the knowledge of Traditional Owners. The input made for the traditional management of ecosystems must be appropriately remunerated, with funding systems identified for an ongoing and consistent financial support where Traditional Owners are engaged in land management programs. Acknowledgement must be made to Traditional Owner IP (intellectual property), with permission sought to publish any information received and remove any sensitive traditional knowledge that is not for wider use.

Our Recommendations:

- Modernize the purpose of the Act to be forward facing and reflect community values.
- Provide clear objectives in the Purpose of the Act and include a separate Explanatory Memorandum (EM) that addresses the duty of care and explores further intent.
- Provide clearer definitions of the principles relating to the Wildlife Act, such as wildlife and habitat.
- Address wildlife, habitat, and ecosystems in a holistic manner to reduce overlap and increase efficiency.
- Include management plans and implement the Assess, Plan, Act – Report model for species/habitat management.
- Acknowledge that the Traditional Owners are key decision-making stakeholders when concerning species and ecological management and co-design a system to ongoingly support Traditional Owner engagement.
- Acknowledge, respect, value and weave Traditional Ecological Knowledge into species management plans and decision-making processes.
- Prioritise Traditional Owners for the ongoing management of species on country.

Summary of ZAA’s responses to the questions outlaid by the Review Panel:

1.1.1 In what ways does the Act succeed or fail in representing contemporary expectations for, and values relating to, wildlife in Victoria? Please provide examples from your own experience.

The Wildlife Act is currently failing to reflect the contemporary expectations surrounding the protection of wildlife and the environment. The community highly values environment and wildlife protection and is demanding a more cohesive and forward-facing approach that supports conservational management. The value of Traditional Owners and their connection to country, ecosystems and wildlife is important to contemporary values and must be inherent in the Act, as well as a clear reference to Climate Change and its impact on the landscape and species survival.

1.1.2 Are there conflicts between the interests or expectations of different stakeholders or community members regarding wildlife in Victoria? Please provide examples from your own experience.

The overwhelming interests from Zoos and Aquariums is that conservation, research, and protection of our wildlife is paramount. The Act must include a broader definition of wildlife, which is then split into wildlife categories with a corresponding management plan framework. This would assist with addressing the intentions between conservation and sustainable use and support a risk-based approach.

1.1.3 How can the Act balance the diverse interests of Victorians in protecting, conserving, managing and using wildlife? How might such competing interests be better reconciled in legislation? Are there examples from other sectors or other jurisdictions (both in Australia and internationally) that may be useful?

Indigenous engagement must be included in the framework and there must be space provided for Traditional Ecological Knowledge.

Competing issues can be managed through wildlife categories and a management plan framework (which involves stakeholder consultation), to deliver on the Act’s purpose and goals for species or ecosystems.

1.2.1 Are the current purposes of the Act satisfactory? What should the outcomes, objectives or purposes of the Act be? How should the objectives and purposes of the Act relate to the desired outcomes? How would they ensure desired outcomes are achieved?

The current purposes of the Act are unsatisfactory. There is a need to modernise the purpose of the Act, modelled off the NSW *Biodiversity Conservation Act 2016* and clarify the definitions. The objectives of the Act must be listed under the purpose and provide clear and concise focus of the Act. Desired outcomes can be achieved through frameworks that support mechanisms of conservation work, such as management plans and the Assess, Plan, Act, Report model.

1.2.2 If objectives and purposes are likely to be competing, how could the tensions be resolved?

The purpose of the Act must reflect all the objectives it hopes to achieve. Refer to structure in section 1.3 of the NSW *Biodiversity Conservation Act 2016*.

1.2.3 Are there examples of well-designed legislation from other jurisdictions (both in Australia and internationally) with clearly stated objectives and purposes that could inform Victorian law?

See section 1.3 of the NSW *Biodiversity Conservation Act 2016*.

1.3.1 Is the Act a barrier to self-determination for Traditional Owners or Aboriginal Victorians? If so, what specific elements give rise to barriers and how might these barriers be reduced or eliminated?

Yes, we recommend consultation with Traditional Owners so these hurdles may be identified and then frameworks included in the legislation that acknowledges these barriers and support a system to overcome them.

1.3.2 Should the Act recognise the cultural significance of Country and wildlife to Traditional Owners and Aboriginal Victorians? Should the Act explicitly recognise the value of Indigenous Ecological Knowledge for the stewardship of Country and the conservation of wildlife?

We acknowledge Traditional Owners knowledge and the importance of their input into the management of ecosystems, their unbroken connection to country and the Acts responsibility to reflect the culture of the First Nations people. Indigenous Ecological Knowledge must be valued and remunerated accordingly for inclusion in management of the protection of wildlife.

1.3.3 Should the Act prescribe a role for Traditional Owners and Aboriginal Victorians as key partners in decision making about conserving wildlife? What could that role look like?

The Act must make space for the Traditional Owners to choose to be involved in conserving wildlife. The Act must promote appropriate engagement with Traditional Owners and respect their engagement protocols. The Act must support structures that are inclusive for Traditional Owners in the decision-making processes and ongoing management of wildlife.

1.3.4 Should the Act afford additional protection and the ability to return species to country because of their cultural significance?

Species that have particular importance to Traditional Owners must be afforded protections according to the information provided by Traditional Owners. Management plans for these species must have Traditional Owners engagement and input where possible, with mechanisms to enable outcomes relevant to the sacred nature of any species.

1.3.5 Does the Act provide appropriate mechanisms for Traditional Owners and Aboriginal Victorians to use wildlife? Should the Act support commercial use of wildlife by Traditional Owners and Aboriginal Victorians?

ZAA supports the Traditional Land Councils and other Traditional owner organisations view in this area.

1.4.1 Should the Act prescribe a general duty of care related to wildlife conservation or biodiversity protection more broadly? Why or why not? How could it work in practice?

The Act should not include a general duty of care, however, an accompanying explanatory memorandum to the revised Act may be utilised to give additional context to the purpose of the Act. This would provide more detail around the intent, hierarchy of decisions and avoid cluttering the Act with statements that hold less legislative power – keeping the Act clear and concise.

1.5.1 Are there any definitions that are unclear or confusing or that cause problems for achieving the outcomes and objectives of the Act?

Yes, the definitions of the Act need to be reclarified and include definitions for habitat, ecosystem and biodiversity. The definition for Wildlife also needs revising, and must refer to all species in nature i.e., exclude only domestic animals and animals relating to agriculture.

1.5.2 Should any additional animal species or taxa (groups of species) be included in the definition of 'wildlife' or 'protected wildlife'? Should any species or taxa be excluded and therefore be exempt from some provisions in the Act?

Wildlife must be redefined to include all wildlife i.e., all animals excluding domestic animals and animals relating to agriculture. Wildlife can then be sub-categorised for various management streams. The provision of exemptions for management purposes are warranted, however the governor must not be able to change the definitions once they are created.

1.5.3 Should 'game' animals be defined as wildlife in the Act or defined some other way or excluded from the Act entirely?

All wildlife must be classified as wildlife with a framework that allows for different management streams for the different categories of wildlife, such as 'game'.

2.1.1 Do you have any comments on the interactions between the Wildlife Act and other legislation?

The *Flora and Fauna Guarantee Act 1988* should be incorporated into, or closely referenced within the Wildlife Act., this way wildlife, habitat, ecosystems, species, pest management could all benefit from being addressed through management in a cohesive holistic way.

2.1.2 Should wildlife, flora and fauna generally be regulated by a more inclusive statute?

Yes, as looking at them separately likely leads to overlapping work or conflicting strategic approaches.

2.1.3 Should game management be regulated under its own Act? What are the advantages and disadvantages of such an approach?

Management of game species must be included in the Act, and management must proceed as per the sub-category of wildlife in which 'game' falls.

2.2.1 How do regulatory differences between states help or hinder wildlife management? Please provide examples from your own experiences.

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2.2.2 How can the review of the Act address differences in regulation across land tenure regimes?

The proposed creation of management plans (refer to Section 2) for different categories of species would allow for consultation from external stakeholders, including experts in the areas of the competing regulations. These stakeholders can be invited and collaborate on the management plans to reduce the impact that differing regulations have on the species.

2.3.1 In what ways does the Act succeed or fail in protecting and conserving wildlife habitat? Please provide examples from your own experience.

The Act currently does not include conservation measures for habitat. This must be included in the Act moving forward to allow for a holistic approach to conservation.

2.3.2 How should the Act provide for the protection and conservation of wildlife habitat?

The Act must incorporate the *Flora and Fauna Guarantee Act 1988* so that there is less separation of these key biodiversity components. Or failing this, introduce management parameters into the revised Wildlife Act that address habitat and provide mechanisms to support wildlife requirements.

2.3.3 Should the Act prescribe duties for landowners about protecting and conserving wildlife and wildlife habitat on their land? What could those duties look like?

Protection of habitat on private lands must be addressed in the revised Act and managed via the Regulations and the proposed species management plan framework. Key landowners must be important stakeholders in the consultation of the management plans.

2.4.1 Do property rights related to wildlife need clarifying? If so, how?

Clarification of the ownership of wildlife is needed as a definition in the Act.

2.4.2 Should private landowners have greater rights to use of wildlife on their property?

Sustainable use of species must be monitored through management plans which include private landholders' interests. Appropriate licenses must still be maintained and acknowledge areas of indigenous sacred species and threatened species.

3.5.1 Should the Act recognise sentience of some wildlife and, if so, what would this achieve? How would this recognition affect the rights and responsibilities of governments, businesses and individuals?

Sentience can be acknowledged in the Explanatory Memorandum, which must establish an intention of recognition and high standards of conservation and care for the wellbeing of wildlife.

2.4.4 What rights and responsibilities should Traditional Owners and Aboriginal Victorians have related to wildlife?

The Traditional Owners hold a connection to country, wildlife and ecosystems that must be recognised and supported through the legislation. Traditional Owners must have power in decision making surrounding species management and must have self-determination for use of wildlife.

3.1.1 Should the Act include statements of principle and criteria to guide regulators, duty holders and the public? Why are such principles important? If you do support including principles, what do you think they should be and why?

A clear purpose and list of objectives would enable direction to guide regulators. Principles outlined in various wildlife management plans would also provide clear guidance. Best-practice principles of wildlife care must be documented in guidelines.

3.2.1 Should the Act include provisions for consultation with the community on certain issues? What issues should undergo community consultation?

Community consultation is an important mechanism to support engagement, understanding and behaviour change. A clear Purpose and list of Objectives in the revised Act would also support targeted community input.

This is linked to 4.2.1 as consultation with experts is the advised system for the creation of the management plans, which must be overseen for consistency and efficiency.

3.2.2 How can community involvement in decision making under the Act be improved?

The provision of stakeholder engagement in management planning allows for greater organisational involvement in the implementation of these plans. These organisations often have links with local communities, which will allow community feedback into management planning. Or consultation can directly involve community groups where interest for the management of certain species is high.

3.2.3 Are there currently barriers to private sector actors having meaningful involvement in wildlife management and conservation in Victoria? What are those barriers and what problems do they create for achieving the objectives of the Act? How might any such barriers be removed or minimised?

There are currently gaps throughout the permitting systems and a lack of connection between projects for conservation within the government and private sector. There is currently underutilised cooperation of conservation initiatives through management plans and reporting.

3.3.1 Should the Act enable wildlife management plans? What provisions should be included for such plans?

Yes. Please refer to Section 2 in the ZAA executive response for greater detail.

3.4.1 Should the Act simplify and clarify the provisions relating to the various licences, permits and authorities? Is there scope to reduce regulatory burden without undermining the intended outcomes of the Act?

Yes, there is a requirement for more clarity in the licensing and permitting legislation for wildlife licenses. Linking licensing and permitting into the various management plan frameworks would ensure that these regulations support the conservation goals, and the overall objectives of the Act.

3.5.1 Is the Act transparent about who pays for regulatory services?

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3.5.2 Is full cost recovery appropriate, or should fees for some licences and activities be subsidised? What role is there for user pays or beneficiary pays principles? What, if any changes, should be made and why?

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3.6.1 Should the Act contain provisions that allow for issuing mandatory codes of practice, standards, or guidelines?

Yes, the guidelines that address caring for wildlife practices must be enforceable if anyone is found to be in direct and distinct breach. A potential loss of wildlife licenses or permits can be linked to inability to follow guidelines if the guidelines have been structured to reflect modern practices.

3.6.2 What activities could most benefit from the development of mandatory codes or standards?

Uniformed best-practice principles in the care and rehabilitation of wildlife.

4.1.1 Does the Act require an adequate degree of transparency about, and accountability for, decision making on matters relating to wildlife? If not, how could this be improved? For example, which activities/decisions/ criteria should be more transparent? Which parties should be more accountable and for what?

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4.2.1 Should the Act include provisions that require and enable establishment of a scientific advisory committee or advisory panels to provide expert guidance to key decision makers such as the Minister, the Secretary or the regulator on specific matters relating to wildlife? Why or why not? What other approaches are available?

We support the assembly of advisory panels who may guide the Minister or governor in decisions surrounding wildlife and habitat conservation. An advisory committee could be employed to approve the management plans that are created for species/habitat and to ensure appropriate stakeholder engagement has taken place, including the incorporation of Traditional Ecological

Knowledge and to ensure the appropriate measures have been followed to encourage Traditional Owner engagement.

ZAA will not comment on section 5

References:

Department of Agriculture, Water and Environment. (2020). Australian Government bushfire recovery package for wildlife and their habitat Provisional list of animals requiring urgent management intervention. Commonwealth of Australia