

Introduction

We welcome the review of the Wildlife Act.

As an outcome of the review, or following on from the review, we would like to see consideration given to the following changes which we consider would improve the implementation of the Act and help to protect and sustain our reptiles.

Licencing

1. Greater uniformity between VIC and the other mainland eastern states (QLD, NSW and SA) in the regulations for keeping, breeding and trading of reptiles and in the species schedules that are allowed to be held privately under licence (see below under Schedules).
2. A relevant licence be required to hold any reptile. Currently a number of reptiles can be kept without a licence which increases the potential for these reptile species to be exploited commercially and be subject to poor husbandry in captivity (see below under Schedules)
3. Introduction of some form of vetting process to progress from basic to advanced and other forms of licence. Advanced licence holders should need to demonstrate that they have the experience, husbandry and housing facilities to keep reptiles on the advanced schedule.
4. Keeping of highly venomous snakes (and perhaps crocodiles) should require a separate grade of licence, a demonstrated history and experience in keeping reptiles and/or proof of an accredited course regarding their safe handling and husbandry (noting that such course would need to be established; e.g. by local Herp Societies).
5. The current hard copy licences are easy to forge and keepers are not able to otherwise confirm if the licence holder of a buyer or seller is legitimate. Access to a web based system so that suppliers and receivers could check eligibility of receivers and buyers which would allow both to confirm eligibility of each other.
6. Introduction of special private licences to experienced and vetted keepers to be part of breeding programs for endangered or threatened reptiles which are not otherwise able to be kept. There are many very experienced reptile keepers in Victoria who would be willing and able to assist in formalised breeding programs with the aim to provide offspring for release back into the wild.

Import and Export

1. Greater uniformity in the export and import requirements and documentation when exporting and importing reptiles interstate with appropriate checks being undertaken that the suppliers and receivers of reptiles are licenced, and a requirement to nominate whether the reptiles have been captive bred or legally taken from the wild (under licence and include licence details). This would likely require an enhanced computer data base system that is accessible by wildlife departments of all states and potentially also by reptile keepers.

Record Keeping and Documentation

1. Update the methods (to web based?) of documentation for keeping, breeding and trading of reptiles. The current record books are cumbersome, poorly set out with insufficient room for some entries and prone to

error and omissions. A web based system would allow keepers to maintain their record book on-line and would allow the Department to monitor species numbers and movements more effectively.

Species Schedules

1. Review of the current species on the schedule lists so that they are based on sensible criteria such as ease of maintaining reptile health, ease of husbandry, size of reptile, danger to public, danger to the environment on escape etc. The current species schedules appear to be historical and haphazard. In particular:
 - a. A number of reptiles species on the basic species schedule are more difficult to keep and require more specialised husbandry, or are potentially more dangerous (e.g. large monitors, large pythons, aquatic species) than species on the advanced schedule (e.g. leaf tail geckos, spotted tree monitors (e.g. *varanus scalaris*), some knob tail geckos) which are relatively simple to keep in captivity.
 - b. Highly venomous snakes should be on a separate schedule and require a specialist licence (see above under Licence).
 - c. The current species schedules allow some reptiles to be kept without a licence. Reptile vets see a disproportionate number of reptiles which don't require a licence (e.g. blue tongue lizards and long neck tortoises) in poor health. Our view is that all reptiles held in captivity should be registered and require a licence.
2. Additional species should be added to the current schedules. There are a number of species that cannot be currently held in Victoria but can be held in other states. These species are available commercially (as captive bred) relatively easy to keep in captivity and are certainly no more difficult to keep than similar species on the current Victorian schedules. They would not endanger local species if they escaped as they would either die during our cold winters or be unable to breed as ground temperatures are too low for eggs to hatch. For example, black headed monitors (*varanus tristis*) can be held under the current basic schedule, but spotted tree monitors (*varanus scalaris*) which are of similar size and nature and require similar husbandry are on the advanced schedule, but other similar monitors such as Kimberley rock monitor (*varanus glauerti*), Pilbara rock monitor (*varanus pilbarensis*) and Emerald tree monitor (*varanus prasinus*) cannot be held in Victoria but are being legally kept and captive bred in other states with sufficient numbers available that they are advertised for sale on reptile websites.
3. Victoria has some of the most experienced private reptile keepers and breeders and vets in Australia. A review of, and addition of species to the schedules would increase the number of captive bred reptiles available, helping to reduce the illegal trade and/or take from the wild. It would also increase sustainability and species survival, by guarding against wild population loss and potentially could be integrated into re-release situations in the future as population growth and habitat loss continues.

Penalties

1. The current penalties with respect to illegal trafficking of reptiles are not adequate, especially for those who use illegal trade of reptiles as a source of income. Greater penalties for illegal activities especially in respect to trafficking, taking from the wild, killing wild reptiles and cruelty are required to make such activities less attractive.