

Thanks for the opportunity to contribute to this review.

I have a background in farming with qualifications and experience in environmental management (including compliance) in the public and private sectors of Victoria, WA, and NSW that included native and non-native fauna management. Volunteer with the Wildlife Information and Rescue & Education Service (WIRES, NSW) and reptile rescuer, WA.

Firstly, I stress the importance to compliance of any piece of legislation – that it is targeted, concise, clear, and achievable.

Notes on a few topic areas of the legislation are below.

Cats and other introduced species

Legislation protects non-native species at the expense of natives, particularly in relation to pet and feral cats that have been implicated in 26% of global mammal, reptile and bird extinctions since the 1600's (see CSIRO report, noted below).

Issue	Possible solution(s)
Native species are protected, however, each cat – both pet and feral – contribute to hundreds of native animal deaths each year. They are the definitive host of Toxoplasma (causes morbidity and death, etc.).	Review CSIRO report: <i>We need to worry about Bella and Charlie: the impacts of pet cats on Australian wildlife</i> at https://www.publish.csiro.au/wr/Fulltext/WR19174 . Prioritise native species and others' wellbeing over cats being allowed to roam free: 24/7 cat containment, neutering of animals, and registrations. Monetary deterrent for non-compliance.
Protection of non-native species at the expense of native fauna and flora.	Remove protections on non-native species.

Reptile removal

Victorian legislation, I believe, promotes commercialisation of the catch-and-release of reptiles at the expense of reptiles.

Problem	Possible solution(s)
Only commercial operators are likely to obtain a commercial licence needed to relocate problem reptiles, as they can recoup the fee and expenses. Therefore, expensive/difficult to obtain reptile relocation services (especially in rural areas) resulting in unlawful killing of these animals.	Have a volunteer system in place like WA. I.e., trained volunteers (licensed) can legally relocate (problem) reptiles. Services offered through the Department (online listing). WA permitted nominal payment to cover travel costs to volunteer (goodwill token).
Reptile awareness/appreciation is lacking in Victoria	Draw on all reptile handlers to educate the public on the benefit of these animals. (As above.)

Abundant native fauna

Legislation recognises that certain native fauna requires population management, however, processes to obtain licences are inefficient and onerous (and without clarity for the applicant).

N.B. Faunal populations are controlled naturally principally through predation and starvation (availability of resources). Periodical culls to maintain a healthy sustainable population is more humane and enables better management of resources long term.

Problem	Solution
Inefficient process for managing abundant native fauna through annual licences (and property inspection).	Think tank to achieve same/better outcomes whilst providing the necessary protection to the wildlife. Department (automatically or through an initial assessed application) issue landowners with a nominal annual quota. Temporary/permanent revocation of quotas, or application of a percentage to quotas to refine these year-by-year?
Applicant is left unclear of how quotas are calculated, as often much less than the requested number and less than number required to make a marked impact to continued property damage and grazing pressures, with no explanation provided.	More clarity surrounding quotas given, as these often do not align with numbers on the ground.
Commercial harvesting applies evolutionary pressures to animals by targeting the larger animals.	Apply protection in licences for genetically superior animals.
Culled/hunted animals often left on the ground.	Explore avenues for using culled/hunted animals that does not have a financial incentive.

Keeping of native fauna

Consider allowing native fauna to be kept as pets, to preserve species, and reduce non-natives.

