

The Independent Review Panel for the Review of Victoria's Wildlife Act 1975

Thank you for the opportunity to present this submission to the Panel. I'd like to take the opportunity to introduce Moonlit Sanctuary as a private sector involved in conservation of wildlife. I have included some notes about Moonlit Sanctuary and our conservation activities, then answered those questions we believe we can usefully address

We believe private sector actors can make substantial contributions to conservation and should be encouraged and enabled to do so. We are willing to present further to the Panel if desired.



Michael Johnson
Director and Founder
Moonlit Sanctuary Wildlife Conservation Park

About Moonlit Sanctuary

Moonlit Sanctuary Wildlife Conservation Park was established in 2001 with a vision to lead in the conservation of wildlife and in the presentation of Australian fauna, and in doing so provide an outstanding visitor experience. Moonlit Sanctuary is located on the north-western corner of Western Port Bay within the City of Casey. As well as being open to the public on a daily basis, Moonlit Sanctuary offers a curriculum-based education program which is provided to about 11,000 school children per year.

Awards Moonlit Sanctuary has received numerous awards for business, the environment and tourism, including:

- Premier's Sustainability Award for Environmental Protection, 2017.
- Four-time winner of the Victorian Tourism Award in Ecotourism, most recently 2019.

Accreditation and other

- Ecotourism accredited with Ecotourism Australia since 2005 and granted the title "Green Travel Leader" in 2015.
- Animal Welfare accredited with Zoos Aquarium Association since 2014 and member since 2001.
- Wildlife Displayers Licence holder since 2001.

Conservation Involvement

Moonlit Sanctuary has always considered conservation of wildlife to be core business. In that regard we prioritise holding threatened species and educating the public through interpretive displays and staff presentations. In addition, we have been involved in several breeding programs for threatened species:

Julia Creek dunnart *Sminthopsis douglas* 2001-3 A dozen animals were received from the Queensland Government as the species was at that time regarded as Critically Endangered. They were bred with the intention of establishing a captive breeding program. Further research indicated the species was not threatened and the program was abandoned, with most animals released.

Tasmanian devil *Sarcophilus harrisii* 2009-present. Hold post-reproductive animals on behalf of the captive breeding program.

Orange-bellied parrot *Neophema chrysogaster* 2012-present. Moonlit Sanctuary has made a significant contribution to the captive breeding program which has stopped the extinction of this Critically Endangered species and been a primary driver of the recent increase in numbers. Some notable contributions include:

- Fledged 244 young birds.
- Provided 144 of those birds for release.
- Since 2019, hosted the Captive Management Program and provide the Species Co-ordinator and the Studbook Keeper.
- Ranched wild birds over the winter season to reduce wild mortality, with 100% success. (2018 and 2019, suspended due to COVID)
- Conducted a mainland autumn release of birds in the Western Port region in autumn 2020 and 2021. We believe this is the first occasion a private company has financed and conducted a release of a threatened species for conservation reasons in Victoria.

Regent honeyeater *Anthochaera phrygia* (2013-present) Breeding birds in support of the program managed by Taronga Zoo. Several Moonlit Sanctuary bred birds have been involved in releases.

Helmeted honeyeater *Lichenostomus melanops cassidix* (2015-present) Held birds in support of the program managed by Healesville Sanctuary and this year received our first viable pair with breeding recommendations.

Additionally, we have recently been funded through the Threatened Species Commissioner and the Zoos Aquarium Association to construct a facility and manage a breeding program for threatened *Pseudomys* species, The building is well along the way towards completion and we expect the first animals later this year.

Questions to be answered.

We are only answering a small number of questions where we believe our experience and situation can assist.

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

All species of indigenous animals and plants and their habitats need protection and should be covered by the Act.

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

When asked recently by a Department officer how I regarded the ownership of the animals at Moonlit Sanctuary, I replied that I did not consider I owned them but was their guardian. Within most zoos (especially ZAA members) animals are moved without payment or other recompense. Over the past 20 years there cannot have been more than 10 occasions where money has changed hands in relation to animal transactions involving Moonlit Sanctuary.

Ownership comes up occasionally in discussion amongst those holding live animals and there is confusion as to the status of wildlife held by zoos or privately. What ownership does the State have compared to the holder? This is far from clear and does need clarifying. For instance, if the State owns the wildlife are they liable for the cost of its care?

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

Yes, there should be consultations. Specifically in relation to our own business there should be consultation with stakeholders regarding regulations for holding animals. There was consultative committee of licence holders however this was apparently abolished as a cost cutting exercise.

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 is no clear pathway to involvement in conservation. In our case we have always acted on the assumption that our Displayers Licence allowed us to hold any animal we could legally obtain. Recently Department officials have informed us this situation in regards to orange-bellied parrots is inadequate and they are looking at other options. It is interesting that almost all the captive breeding programs we have been involved with so far relate wholly or partially to interstate authorities.

We learnt recently there is a "Conservation Permit" that may be issued by DEWLP. However, it has only ever been issued once and there are no regulations pertaining to it. Perhaps this is an option. The attitude of the Department however needs to be that it is a good thing for private sector actors to be involved.

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?

Overall, we have found the regulatory burden has been fairly light, and to date has not stopped us doing anything we wish to do. There are degrees of inflexibility which seem to work to nobody's advantage. There are also antiquated practices. For instance, we are required to maintain a hand written record of species kept in a book provided by the Department, and annually provide a hand written form as a report on gross numbers kept of each species, movements, births and deaths. This of course is extremely expensive and time consuming and also subject to error and potential fraud. We keep our own records on the ZIMS record keeping software and could at moment's notice produce a full report down to individual level.

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

According to our licence renewal notices, the licence fee does pay for the "service" of administering the licence, less a discount for the conservation and education services wildlife parks are expected to provide. In that regard I suppose there is transparency about who pays for the licence service, that is the licencees. It is disturbing to imagine, though, that licencees are paying for the antiquated record keeping system described above.

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?

I believe our licence fee is around \$700 per annum. Given the cost of conservation and education work we do are valued at in excess of \$500,000 per annum of course additional subsidy would be welcomed.

It is interesting to note that during the COVID crisis, purveyors of alcohol were offered reductions to their licence fees, but no such deduction was offered to wildlife licence holders.



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

As it stands, Wildlife Displayers Licence has conditions attached that are effectively standards. Currently the codes of practice for wildlife display sit under the Department of Agriculture and these should be brought in under the Wildlife Act. While it is important that minimum standards are enforced, it is also important that there is flexibility that allows innovation and improvement to occur.

Deer

On a final note, I occasionally spotlight for gliders and owls in and around Bunyip State Park. Sambar deer are usually seen on every visit, and are as commonly seen as kangaroos and wombats. Our opinion is that invasive, introduced species should not be afforded protection under the Wildlife Act, and this should apply to deer as much as it does apply to horses and rabbits.

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