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Submission on Protected Wildlife Reform

The North Queensland Conservation Council welcomes the opportunity to partake in public consultation regarding the framework for the management of protected wildlife.

Do you think take of species from the wild (for instance frogs, scorpions and spiders) should be regulated to ensure that the process is sustainable and does not threaten the long-term viability of the species?

NQCC supports that species such as frogs, scorpions and spiders should be regulated to ensure the conservation of the species. It is unacceptable that unregulated harvesting of protected scorpions and spiders may have already contributed to the extinction of certain undescribed species. Another concern is the biosecurity risk that the movement and release of amphibians presents. This area should be regulated to ensure a high standard of biosecurity and that threatened or near threatened species of frogs aren't being misidentified and being removed from their habitat.

Is the current framework for keeping protected animals in Queensland too complex? How could the framework be improved?

Is the current framework for keeping protected animals outdated compared to other Australian jurisdictions?

Do you think there is a better way to class licence types, rather than the current 'commercial' and 'recreational' distinction?

It appears that the Department is already well aware of the excessive regulation on commercial activities compared to the private 'recreational' keeping and trading sector of protected animals. This is an obvious area for reform.

NQCC has only general comments about the comparison of protected animals in Queensland to other jurisdictions in Australia. The regulatory framework that the

Department pursues should be in line with best practice management and should aim to be consistent with extant regulations in other states and territories, as to discourage the legal taking of a protected animal from one jurisdiction for trade or sale in another.

Would an electronic system (e.g. recording movement advices and records online) create an easier system for keeping and moving protected wildlife?

The Department seems to have already identified inefficiencies with their current record management system. Any system that creates gaps in data or opportunities to falsify records needs immediate reform.

An electronic system of management is an obvious reform avenue. This could facilitate better information sharing between stakeholders, such the Department of Environment and Heritage Protection, Queensland Parks and Wildlife Service, Queensland Biosecurity, Queensland Police and perhaps Federal agencies like Customs.

Are there low risk activities that should be subject to a lower level of regulation – such as through self-assessable approaches?

Are there low risk activities that should be exempt from requirements of the nature conservation framework?

Are the Nature Conservation Regulations too complex?

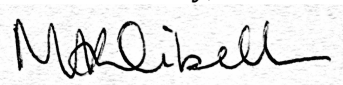
NQCC doesn't have intimate knowledge of navigating the regulatory system. Comments were invited from our members but we received no specific feedback. We support that the Department should examine whether there is a mismatch between the risk level of an activity and the level of regulation it attracts. Self-assessable approaches need to be considered carefully as they can be prone to misuse. Enforcement must be upheld for any regulation to be effective.

Options for regulation review

NQCC supports the third option; the remake the Nature Conservation Regulations and relevant conservation plans with a view to address the identified policy issues.

We also encourage that the Department consults widely when progressing further with this regulatory review so that the best outcomes can be achieved for strengthening conservation, reduce illegal trafficking of wildlife, and increase efficiency of regulatory processes.

Yours sincerely,



Maree Dibella
Coordinator