

17th September 2021

National Registration Scheme for Native and Exotic Live Birds

Animal Care Australia Inc. (ACA) is a **national based animal welfare** organisation representing the interests of all hobbyist and pet animal keepers. Our members are comprised of most major animal keeping representative bodies including those representing dogs, cats, birds, horses, small mammals, reptiles, and fish.

ACA has reviewed the background papers for Laws Governing the Export of Live Exotic and Native Birds as well as the recommendations from the KPGM Review and we are bemused by how the introduction of yet another bird registration scheme has been borne from the KPGM recommendations!

In particular, Recommendation 8 *“Establish a registration scheme to prove lineage of specimens to be exported, including a consideration of DNA testing requirement.”*

Our attached response highlights our reasoning behind the following recommendations:

Recommendation 1:

ACA DOES NOT support the introduction of a National Registration Scheme for ALL Exotic & native Birds

Recommendation 2:

ACA will support a requirement for birds intended for export or import to have DNA parentage testing and the registration of ONLY those birds intended to be exported

Recommendation 3:

ACA supports the CCBFA’s DNA parentage testing protocols for birds intended for export.

Should you have any questions or require further clarification please do not hesitate to contact us. We welcome further consultation.

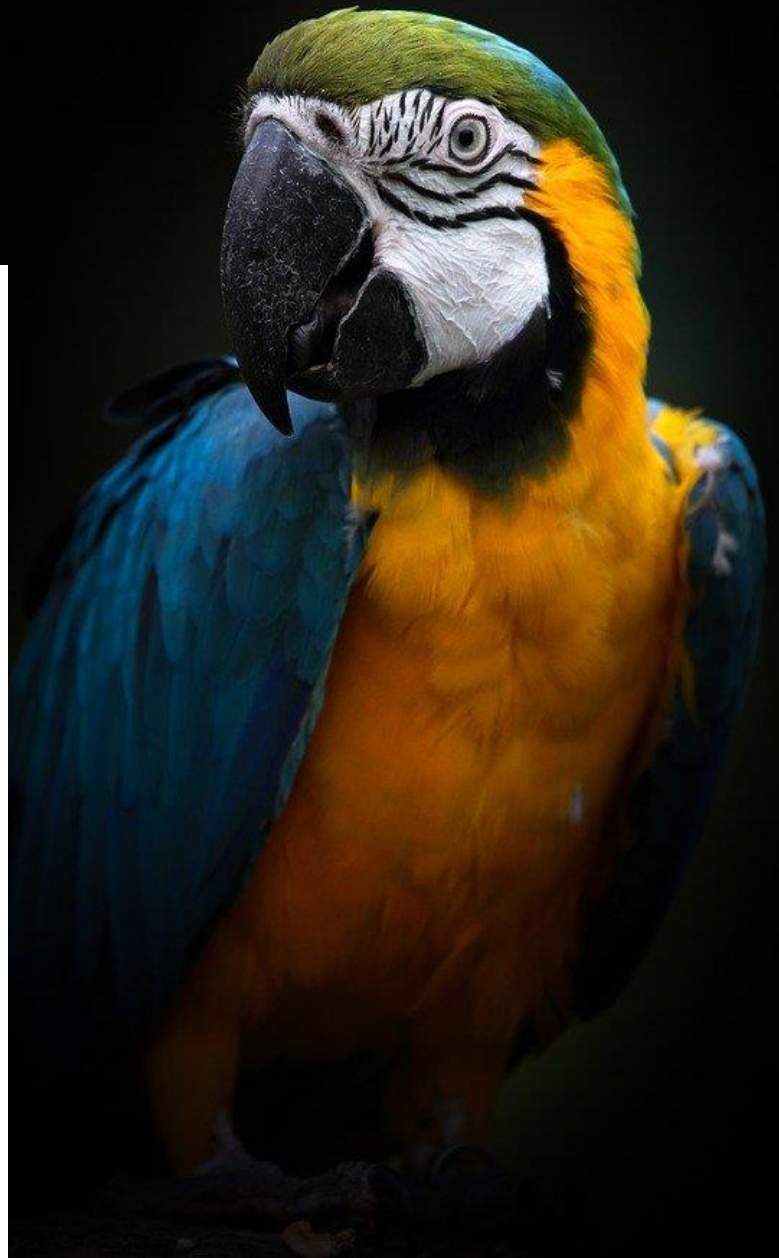
Kind regards,

A handwritten signature in black ink that reads 'M Donnelly'.

Michael Donnelly
President, Animal Care Australia.
0400 323 843

National Registration Scheme for Native and Exotic Live Birds

2021



SEPTEMBER 17 2021

ANIMAL CARE AUSTRALIA
STAKEHOLDER SUBMISSION

National Registration Scheme for Native and Exotic Live Birds 2021

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ACA has reviewed the background papers for Laws Governing the Export of Live Exotic and Native Birds as well as the recommendations from the KPGM Review and we are bemused by how the introduction of yet another bird registration scheme has been borne from the KPGM recommendations! In particular, Recommendation 8 ***“Establish a registration scheme to prove lineage of specimens to be exported, including a consideration of DNA testing requirement.”***

As a national animal welfare organisation ACA is concerned when governments suggest registration schemes that have no direct impact on improving animal welfare, and accordingly our interest in this proposal is to **oppose** the introduction of a scheme that will be:

- cumbersome,
- a financial burden on the Australian taxpayer, with no actual financial benefit,
- pointless as it will not achieve its proposed intent
- a tool to register birds and/or taken from the wild and smuggled into Australia which in turn will legitimise the smugglers (as seen in previous registration schemes
- non-beneficial to the welfare of birds.

The welfare of animals, and in this case, birds is best assured by ensuring animals that are to be exported or imported are quarantined, have been health-checked prior to be moved and again upon arrival. There is NO animal welfare benefit gained by the government knowing where each and every bird resides within this country.

The latest statistics suggest there are approximately 6 million birds kept as pets in Australia. These statistics are an estimate, and we suggest the number would be greater. A registration scheme that would require the recording of each bird that is bred, dies, and is sold/traded, along with requiring each of those 6 million plus birds to be individually identified is **simple madness** and bureaucracy at its most stupendous level. .

Understandably the government may wish to ensure birds being exported have not been taken from the wild, which is a completely different factor than knowing the daily reproduction numbers of every bird.

There is a reason why previous bird registration schemes have failed – they DO NOT justify their intended purpose.

The current export/import system already records the details of those few individuals and/or organisations provided provisional permission to move birds. National registration of those

wishing to import/export birds may be of benefit – however it will still serve no purpose to improving animal welfare – quite the contrary.

Previously national registration schemes have required all birds to be identified and recorded. This has ramifications in terms of animal welfare. The most common means of maintaining bird identification are:

- closed metal rings
- implanted microchips (suitable for larger birds – generally associated with higher \$ value)

Closed rings are applied to birds whilst young and still in the nest. Once a ring is applied the bird's leg grows in size such that the closed ring is unable to be removed. Exact sizing of the ring is vital to avoiding welfare issues.

Experienced aviculturists can confidently apply closed rings. However, the general bird keeping public do not have this skill and this will lead to significant animal welfare consequences for rings applied inappropriately.

These include: including:

- Oversize rings resulting in legs getting caught on branches, wire and other items within the bird's environment.
- Larger rings can also rise above the knee and then cause circulation issues. They are also liable to fall off, negating their purpose.
- Rings that are undersize will damage the bird's leg. It is not unknown for such rings to cut circulation completely resulting in loss of the leg completely.
- Many species, particularly when bred in aviaries, will desert nests if interfered with. The chicks then die of starvation or cold.
- Some species (and individual birds) will reject chicks sometime after rings are applied.
- Some birds species are simply too small and stress too easily to justify the application of a leg ring.

Microchips are only suitable for larger birds and should be applied by a veterinarian or other qualified professional. Permitting unqualified people to install microchips is not recommended – a thorough knowledge of bird anatomy and sterile equipment usage, along with technique training is required to prevent animal welfare issues.

Returning to recommendation 8 – ACA must ask why all of this is necessary for over 6 million birds if ONLY those looking to be exported are required to be registered in some format?

DNA-TESTING:

Blood sampling for DNA-based identification is somewhat invasive as it also requires the bird to be caught and blood sampled, usually from a toenail or blood vessel under the wing. If DNA-testing

became a requirement under a national registration scheme, ACA would hold major concerns on the efficacy of such a requirement – and we strongly oppose any requirement that would mandate ALL birds needing to be DNA-tested – other than those birds intending to be exported.

ACA would recommend that the birds to be exported along with their parents are to be DNA-tested.

ACA supports the recommendations provided by the Canary and Caged Bird Federation of Australia and their DNA Parentage-based Export Protocol

ACA believes there to be no practical way of ensuring a registration would work or achieve its intended purpose.

ACA finds NO ANIMAL WELFARE benefit from a National Registration Scheme and cannot justify its implementation

Should you have any questions or require further clarification please do not hesitate to contact us.

We welcome further consultation as the reforms progress.

Michael Donnelly
President