



Animal Care Australia

2023

ACA's proposal for rehoming reptiles in NSW

**Approved: 3rd January 2023
Animal Care Australia Inc.**

ACA's proposal for rehoming reptiles in NSW

Animal Care Australia submission.

ACA Background:

Animal Care Australia Inc. (ACA) represents the interests of all hobbyist and pet animal keepers nationally. Our members are comprised of most major animal keeping representative bodies including those representing dogs, cats, birds, horses, small mammals, reptiles, fish and exhibited animals.

Opening statement:

Animal Care Australia recently requested a meeting with NSW National Parks & Wildlife Service to raise our concerns with the delay in introducing an appropriate resolution to the issues raised by the rehabilitation organisations some four years ago and are still ongoing, resulting in reptiles taking too long to be rehomed and with many that are rehomed are received in poor health condition requiring additional veterinary care – at the expense of the new owner.

NPWS Representatives at the meeting were:

Andrea Kubin. Louise Hatton and Natalie Izquierdo.

ACA Representatives:

Joanne Payne (ACA Reptile Representative) and Michael Donnelly (ACA President)

During the meeting, NPWS stated there are no longer any delays in reptile rehoming since a review of their processes in February 2022.

While ACA acknowledges our research has shown the issuing of some Authority Numbers to rehome has been reduced to a waiting period of one to two weeks, ACA categorically disagrees with the insistence that there are no rehoming issues. Our research shows reptiles are still not being rehomed some months after they were received by the rehabilitation organisations.

The issuing of an Authority Number is pointless (bureaucratic rigmarole) and makes up only a part of the rehoming process.

It is our belief the current policy and process is in contravention of the Act, License to Rehabilitate Sick, Injured and Orphaned Protected Animals and Code of Practice for Injured, Sick and Orphaned Protected Fauna

ACA reminds the NPWS that animal welfare must take priority and internal policy requirements that delay the rehoming and result in poor health and welfare outcomes clearly require further intervention and review.

References:

The NSW Biodiversity Conservation Act 2016 can be found here: [The Act](#)

License to Rehabilitate Sick, Injured and Orphaned Protected Animals can be found here: [License](#)

Code of Practice for Injured, Sick and Orphaned Protected Fauna can be found here: [COP](#)

Rehabilitation of Protected Animals Policy can be found here: [Policy](#)

Background to this proposal:

In 2018 as part of the NSW Native Wildlife Licensing Review an issue relating to the rehoming of reptiles was raised by representatives from WIRES (Wildlife Information, Rescue and Education Service) and Hunter Wildlife Rescue.

Both parties declared the ongoing difficulty for their organisations to rehome reptiles that have been found abandoned or surrendered.

“Wildlife rehabilitation groups have subsequently confirmed that further options should be explored to enable them to focus their resources on the core business of rehabilitating wild animals and returning them to the wild.”

At the time the coordinator of the review, Mr Robert Oliver raised those concerns with representatives of herpetological groups who agreed to discuss and provide an alternative proposal where reptile rehoming would be carried out by the herpetological societies.

Over the next few months Robert Oliver provided copies of a proposed licensing category and system that could be implemented. The herpetological societies met to discuss and in principle supported the proposals – but with some minor changes. Those changes are incorporated below.

These proposals were in alignment with the regulations of the Biodiversity Conservation Act 2016 and the ensuing review and are attached as an Appendix to this submission.

Continuing Issues:

- Issuing of Authority Numbers is often delayed. Only recently (during the non-influx period) has this been reduced to a two-week turnaround period. Previously taken 3 to 6 months, with some cases up to 12 months.
- Influxes of abandoned reptiles occur during the warmer months.
- Herpetological Societies (except Macarthur HS) have all withdrawn their involvement due to insistence from NPWS of excessive paperwork and long-time frames processing.
- Rehabilitation Services have limited housing and husbandry ability.
- Rehabilitation Services have limited outreach for securing new homes

Current concerns:

ACA is of the viewpoint that WIRES (or any holder of a Carers and Rehabilitation License) holding and caring for captive-bred animals (of any species) is in breach of their licensing conditions AND the purview and purpose of issuing that license under the Biodiversity Conservation Act 2016 – that being the rehabilitation and release of wild native animals back into the wild.

Condition 13 of the license states:

13. If there is strong evidence that the protected animals is an escaped pet (e.g., it was found well outside of its natural range), the rehabilitator must make reasonable efforts to locate the owner or, failing that, notify the relevant NPWS office so that a ballot or other placement can be arranged.

This license DOES NOT permit the holding, keeping, or housing of escaped pets. Nowhere else in the License Conditions or the Code of Practice does it provide any provision for these animals to be kept in the ongoing care of rehabilitation and rescue services.

It is our contention the continued insistence of bureaucratic rigmarole is actively forcing rehabilitators to be in breach of the licensing conditions, creating major animal welfare issues with the holding of captive-bred reptiles.

This same bureaucratic rigmarole is the underlying cause of the herpetological societies withdrawing their rehoming activities.

Clause 107 of the Rehabilitation of Protected Animals Policy states:

107. The NPWS Wildlife Team will establish rehoming pathways to expedite the rehoming of surrendered and seized protected animals to minimise the time such animals are held by groups.

It is this clause that ACA supports the premise of Robert Oliver's proposal to create a licensing category for **'Licensed care and rehoming services'**.

These services and licenses would operate in the same manner as the Care & Rehabilitation Licenses – with one major exception - ACA does not support these being issued to individuals.

ACA is consciously aware of the opportunity of individuals to claim they have discovered a 'missing pet' in order to obtain certain species by other means. ACA supports the importance of herpetological societies to maintain their integrity and the ability for each society to have its own oversight of its members is of no difference to that of the currently approved rehabilitation organisations, and we see no logical reason why they can not be viewed in the same manner.

ACA is also aware of pre-existing working relationships between the rehabilitation organisations and herpetological societies.

ACA has held discussions with representatives of all herpetological societies to ensure their return and participation in rehoming of reptiles under our proposed format. Only one has expressed their inability to participate due to other external matters. We also have the support of the NSW Wildlife Council (Audrey Koosman) to propose the inclusion of herpetological societies as licensed rehoming providers.

While ACA supports the intention and basic structure proposed by Robert Oliver, we are acutely aware of changed circumstances within the herpetological societies and more importantly the rehabilitation sector, and accordingly are recommending an adjusted procedure.

ACA adjustments to original 2018 proposal:

- 1) The **reptile is handed to a herpetological society as soon as possible** rather than still being held awaiting collection. The exception to this immediate transfer would be for medical intervention.

Any medical issues deemed to require immediate veterinary intervention would still be coordinated by the rehabilitation organisations due to their existing working relationships with local veterinary practices. Once a reptile has been assessed, treated and ready for release from the veterinarian, the reptile is to be handed to the local herpetological society for rehoming.

- 2) **Reduction of the proposed timeframe** for submitting reports of rehomed reptiles. The original proposal indicated an annual return, however, ACA believes a quarterly return would provide NPWS with a regular opportunity to carry out any required follow-up with the new owners of the reptiles.
- 3) **Foster system** within the herpetological societies established for medically cleared native animal pets seized by Australian or NSW authorities, except where they confirm the animal is not required to be retained for the purposes of investigation and legal proceedings and can be rehomed without delay.

Proposal for ‘Licensed care and rehoming services’.

For this proposal, the following definitions apply:

Definitions:

AWO – Animal welfare organisations – RSPCA, Animal Welfare League, and veterinarians.

C&R – Catch & Release License Holder – snake catchers etc

LCRP - Licensed Carer & Rehoming Provider – animal keeper groups/societies.

NPWS – National Parks & Wildlife Service – including Licensing Team

WCRG - Wildlife Carer & Rehabilitation Group

Under this proposal herpetological societies (and possibly C&R license holders) would provide expressions of interest to be approved by NPWS as a LCRP to provide ongoing, temporary care and rehoming services for displaced native animal pets. LCRP's to provide primary contact persons as part of the EOI.

Successful applicants would then be authorised, by a Biodiversity Conservation licence, to care for and rehome displaced native animal pets. This would be authorised through the creation of a new licence type to specifically provide rehoming services. WCRG's, AWO's, C&R's, Local Councils and other persons that find displaced native animal pets would then be directed to directly contact their nearest LCRP.

Eligibility criteria

Criteria, which may include:

- The ability to collect or make arrangements to collect displaced native animal pets from NPWS, WCRG's, AWO's, C&R's, or Local Councils
- Availability of suitable facilities for the transport, housing and quarantine of displaced native animal pets that complies with relevant licence conditions and codes
- A commitment to conservation and animal welfare – including a commitment to accept all (native) species that are surrendered (subject to available facilities) to avoid potentially selective rehoming or trade in desirable species.
- Agreement to complete appropriate record keeping

Services to be provided

Services that may be provided by a licensed rehoming provider could include:

- Collecting and safely transporting displaced native animal pets from NPWS, WCRG's, AWO's, or Local Councils to their own facilities
- Providing housing and care for the animal while finding a suitable new owner
- Lawfully disposing of the animal by giving or selling the native animal pet to a suitable animal keeper (licensed animal keeper or authorised by a code)
- Complying with any guidelines issued by NPWS regarding the conduct of collection, record keeping and reporting of their activities.
- Record keeping is not intended to be onerous (quarterly return) and to include the following information:
 - o Date received
 - o Species

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- o How the animal was received (e.g., via rehabilitation group)
 - o Date rehomed
 - o Details of new owner (e.g., name, address, and licence number)

Benefits

- Wildlife rehabilitation groups would no longer be the primary provider for rehoming native animal pets. If animals are surrendered to wildlife rehabilitation groups, they can be passed on directly to known rehoming providers in the area.
- Reduces involvement of NPWS and requirement for time-consuming transfer authorisation processes
- Rehoming providers have greater access to animal keeping community in order to locate the owner of the animal utilising its networks
- Potential access to numerous rehoming providers that would provide greater coverage to what exists at this point in time
- Rehoming providers may recoup costs of housing and (extended) treatment from the sale of native animal pets , that being an adoption fee as already charged at rehoming days and ballots.

Other points of note

- This process removes the potential for individual providers to be selective with the species they are interested in rehoming.
- In cases where no licensed providers operate in a particular region or do not want to rehome a particular animal, it should still remain necessary to consider euthanasia.
- NPWS website and other promotional material will require updating to inform the public on the available options to rehome or where to take lost native animal pets.
- WCRG's may need to be able to retain a native animal (for a short period) as it may not be immediately known whether a native animal is a lost pet or a wild animal in need of care. Once this has been determined, any native animal pets can be passed on to a relevant LCRP
- NPWS may require additional notification when specific (threatened) species are found in order to consider the most suitable placement option.

C&R relationship with LCRP

There is also a need to clarify the relationship between LCRPs and C&R's.

- If a C&R captures a native reptile pet (i.e., species not endemic to the area and listed on the NSW native animal keepers' species list), the animal should be handed over to a LCRP.

- If a C&R captures a native reptile pet and is also a LCRP the C&R licensee may rehome the reptile under their rehoming licence. The licensee must keep separate records of activities conducted under both their C&R licence and rehoming licence.

The Process:

The proposed new process will not apply to wild native animals that are undergoing rehabilitation. (See Notes at end of this section)



The key steps in the proposed new process are as follows:

Step 1: A Wildlife Carer and Rehabilitation Group, Animal Welfare Organisation, Catch & Release handler, or Local Council receives a native animal.

Step 2: The animal is assessed as likely to be an escaped, seized or lost native animal pet. Assessment also determines the animal is physically well, behaviourally well, and suitable to be rehomed to a private animal keeper. They may, at their discretion, attempt to locate the owner of the animal.

- If requires medical intervention animal is taken to veterinary care until animal is deemed medically suitable to be rehomed.

Step 3: Contact is made with the nominated contact person for the Licensed Care & Rehoming Provider.

Step 4: LCRP Coordinator makes agreeable arrangement for animal to be collected and returned to LCRP.

Step 5: WCRG, AWO, C&R, or Local Council record details of the LCRP, and the reptile.

Step 6: LCRP should attempt to locate the owner of the animal utilising its networks. Following this, LCRP does callout to its members seeking a suitably experienced & licensed animal keeper for a permanent new home.

- LCRP may also contact other LCRP's and member associations to request callout extend to their members.

Step 7: LCRP identifies licensed member/animal keeper. Confirms experience, ability to house the animal etc and holds appropriate license (i.e., Class 1/Advanced etc)

Step 8: New keeper collects animal from LCRP. New keeper must show keeper licence and photo ID at time of collection LCRP records license details, name and address and the reptile being re-homed in their records. The new keeper enters the animal in their animal record book as per usual process (either hard copy or e-book).

Step 9: All parties submit reports/records to NPWS.

Animals unable to be rehomed by LCRP within reasonable time:

At times there may be animals that are unable to be rehomed, (often due to their commonality within the keeper community).

LCRP to contact NPWS to advise of these species and the inability to rehome to current membership.

NPWS and LCRP to assess and discuss:

- Use of a public ballot
- Organise a Rehoming Day – in bringing together all other LCRP's unwanted animals
- Euthanising the animal

Note:

Animal Care Australia acknowledges current systems are in place for wild native animals that undergo rehabilitation and are deemed unsuitable for release. It is our hope that these systems can be reviewed and animals that currently would be euthanised due to the limited scope of suitable rehoming would be able to be rehomed under this proposal at some point in the future.

Animal Care Australia sees no justification in euthanising animals that have been rehabilitated and are then euthanised simply on the basis no zoological or rehabilitation organisation can provide them with a new permanent home.

Carers go to great lengths to rehabilitate and preserve the life of the animal only to then take that life because of a closed-minded NPWS policy.

This nonsensical policy must change.

Closing statement:

Animal Care Australia has the support of herpetological societies and carers (including NSW Wildlife Council) in requesting this proposal be implemented.

We look forward to working in partnership with NPWS to make this happen.

Kind regards,

A handwritten signature in black ink that reads "M Donnelly". The signature is written in a cursive style with a large, sweeping flourish at the end.

Michael Donnelly
President
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