

30<sup>th</sup> June 2023

The Director  
Live Import List and CITES Policy Section  
Department of Climate Change, Energy, the Environment and Water  
GPO Box 3090  
Canberra ACT 2601

Email: [exotic.species@dcceew.gov.au](mailto:exotic.species@dcceew.gov.au)

**RE: Proposal to delete unassessed psittacines from the Live Import List**

Animal Care Australia 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.

Our goal is to promote and encourage high standards in all interactions with the animals in our care.

Animal Care Australia has reviewed the Proposal to amend the Live Import List to delete unassessed psittacine specimens as well as the recommendations and **Animal Care Australia do not support the proposal.**

While Animal Care Australia acknowledges there may be a risk of certain escapee species surviving in the wild, Animal Care Australia questions the validity of the research/evidence cited by the so-called experts in mentioned in your proposal.

Your proposal states some 5000 pet birds were reported to be missing on animal websites during the last 15 years with 90% being parrots. (Vall-Llosera & Cassey 2017), and yet you only cite one example of possible ‘extreme’ risk that being the Indian Ringneck (*Psittacula krameri*). The same report shows 3669 natives and only 1787 non-natives escaped. Surely any concern would be with exotic species and not the natives?

Animal Care Australia cannot help but state the obvious:

- ❖ There were 4500 parrots reported missing. In fact, Vall-Llosera & Cassey 2017, goes on to state:
  - *“Larger bodied and long-lived species should be less likely to escape ...”*
  - Surely these would include most exotic psittacines?**
  - *“Australian native parrots should be more likely to escape than non-natives because natives are more abundant in domestic captivity.”*
  - These two points appear to contradict the implied potential of 5000 escapees becoming a concern.**
- ❖ Your report failed to reduce the 4500 (5000) by the number of birds that were subsequently found and returned to their homes, in each year, quoted in the Vall-Llosera & Cassey 2017 report.
- ❖ The data being relied on is actually 6 years old.
- ❖ So, over a total period of 21 years (15 + 6) your proposal has not been able to identify where any large numbers of escaped parrots – let alone psittacines - have managed to establish themselves in ‘extreme’ feral communities DESPITE potentially more than 4500 escapees.

There is an EXTREME level of unsupported assumption being used by the Department to justify this proposal that is clearly not supported by actual data.

Animal Care Australia is aware that there is an equal amount of evidence refuting the claims that captive bred birds are likely to establish feral populations anywhere in Australia, and accordingly we are astonished that there has not been an appropriate consultation with ALL key stakeholders on this matter.

What is the justification for the Department to support a ban on importing native parrots when they have no risk of establishing feral communities and have completed full quarantine requirements before being released into captivity, therefore removing any biosecurity concerns?

Furthermore, all the species on the current list are already present in Australia. Hence the relatively few birds that will be imported are of little consequence.

In light of this, we strongly support the recent submission dated 29<sup>th</sup> June 2023 from The Canary and Cage Bird Federation of Australia Inc. (CCBFA).

Animal Care Australia notes:

- The CCBFA continues to recommend a regulated import regime that is economically viable, whilst protecting the biosecurity and biodiversity of Australia's captive and wild birds.
  - **Animal Care Australia SUPPORTS this.**
- The CCBFA continue to work with those tasked to complete the Psittacine BIRA at the Department of Agriculture, Fisheries and Forestry (DAFF).
  - **Animal Care Australia SUPPORTS this.**
- The CCBFA recommended and had accepted experts to DAFF for appointment to a Scientific Advisory Group (SAG).
  - **Animal Care Australia SUPPORTS this.**
- The CCBFA were not approached or consulted, and as the peak body representing aviculture, including parrot keepers and breeders, nationally and they should have been consulted.
  - **Animal Care Australia is disappointed that the DCCEEW has disregarded and ignored such a vital stakeholder.**
- A range of assertions within the report appear significantly questionable and suspect this is due either the lack of experience and knowledge by researchers, OR the lack of knowledge of the avicultural hobby.
- The CCBFA has requested an urgent meeting to explain and provide supporting evidence and data.
  - **Animal Care Australia STRONGLY RECOMMENDS the Department accept that request to ensure a balanced and non-biased consultation has occurred.**
- **The removal will only incentivise the illegal import of the species and/or their eggs, creating a greater biosecurity risk.**

Additionally, Animal Care Australia has discovered an error in the Proposal document. Table 1 – (page 5) indicates the Red Lory (*Eos bornea*) is an Australian native parrot. This is incorrect, the Red Lory is an Indonesian Lory with only two sub-species kept in captivity in Australia (The Buru Red *Eos bornea cyanonothus* and the nominate subspecies *Eos bornea bornea*.)

Please do not hesitate to make contact if we can assist further.

Kind regards,



Michael Donnelly  
President  
0400 323 843

## **About Animal Care Australia**

As a nationally recognised animal welfare organisation, ACA encourages continued development of animal welfare standards and Codes of Practice for animal husbandry, breeding, training, sale, and sporting exhibitions for a wide range of animal species, including pets, animals used for educational or entertainment purposes or kept for conservation, and in particular native birds, reptiles, and mammals.

ACA was founded in early 2018 to establish an organisation run solely by volunteers to lobby for real animal welfare. With extreme animal rights and animal liberationist ideologies influencing government legislation, regulation, and policy at our expense and to the detriment of our animals and pets, it has become necessary to provide government with a balancing voice.

By uniting the broad spectrum of animal groups, collectively we offer an experienced, sensible approach to animal welfare. We estimate our foundation ACA clubs currently represent well over 150,000 members and that is just in NSW alone!

By educating our members and the public about the importance of treating animals with kindness and respect for their needs and promoting the humane treatment of animals to improve animal welfare outcomes, Animal Care Australia is in the unique position of lobbying and advocating for all animals within our care.

Animal Care Australia provides priority to the following:

- lobbying government for stronger welfare outcomes
- lobbying government to increase education of the public in animal welfare and best care techniques
- educate the public on handling their animals with kindness & respect and the importance of their needs
- educate the public in the differences between animal welfare and animal rights