

1st June 2026

Senator the Hon Murray Watt
Minister for the Environment and Water

Email: minister.watt@dcceew.gov.au

Email: senator.watt@aph.gov.au

Department of Climate Change, Energy, the Environment and Water
Exotic Species – Live Import List

Email: exotic.species@dcceew.gov.au

Re: Recent enforcement by DCCEEW Officers relating to the trade of Dubia Roaches

Animal Care Australia is a national incorporated association established to consult with government in advocating for real animal welfare by those who keep, breed and care for animals. Our goal is to promote and encourage high standards in all interactions with the animals in our care.

Animal Care Australia 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, companion animals, animals used for educational, or entertainment purposes, or kept for conservation.

While Animal Care Australia supports biosecurity safeguards and compliance with Australia's import legislation, recent compliance and enforcement action by DCCEEW officers attending the premises of domestic *B. dubia* traders has yet again highlighted the inconsistencies between federal and state departments relating to the keeping or trading of exotic species.

State government agencies (other than Tasmania) have, to date, permitted the commercial trade of the Dubia Roach. Apparent denial by federal officers that this is not the case is outrightly opposed by the traders who were subject to raids, who have publicly stated they have documented proof of contact with both DCCEEW and the state departments. One trader has supplied copies to Animal Care Australia and those are attached separately with this email.

It is very clear the left hand does not effectively communicate with the right hand – which is no longer surprising and frankly as the federal government it should be a priority to ensure all states and territories are following the same biosecurity assurances.

Animal Care Australia acknowledges Tasmania is the ONLY state that has clear instruction that the import of the Dubia Roach into Tasmania is not permitted.

The enforcement action, this past week against holders of a species that are already widely established in captivity, and the commercial trade has resulted in panic and distress within the commercial holders and private reptile keeping community.

While DCCEEW claims the Dubia Roach is a risk to the environment should it escape, the irony of their actions will result in that exact concern occurring. The department's 'bull in a

china shop' approach to the traders and this issue has increased the likelihood and risk of uncontrolled release by those afraid of now being subjected to raids and will also drive the trade underground.

With this in mind, Animal Care Australia supports the *Draft Risk Assessment Report for the Amendment of the List of Specimens Taken to be Suitable for Live Import (Live Import List)* being lodged on this date by the Pet Industry Association of Australia (PIAA) for the Dubia Roach (*blaptica dubia* Serville, 1838).

Animal Care Australia looks forward to the opportunity to submit to the required public consultation resulting from the application by the Pet Industry Association of Australia.

Should you require further details please do not hesitate to reach out as we would be happy to meet with you and further discuss this matter.

On behalf of the Animal Care Australia Committee,



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About Animal Care Australia

As a nationally recognised animal welfare organisation, Animal Care Australia 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, companion animals, animals used for educational or entertainment purposes or kept for conservation.

Animal Care Australia 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.

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:

- advocating for stronger welfare outcomes
- advocating 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