19th November 2026

Chief Veterinary Officer
Animal Biosecurity and Welfare Branch
Department of Natural Resources and Environment Tasmania

Email: Snake.Review@nre.tas.gov.au

**Re: Proposed changes to Tasmanian import conditions for live snakes**

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.

Animal Care Australia is submitting this in pdf format and not as a word document (as suggested on the department website page) in order to ensure the integrity of the submission.

Animal Care Australia acknowledges the importance of the Import Risk Analysis (IRA) in identifying and assessing the biosecurity risks associated with the interstate importation of live snakes into Tasmania.

We support the objective of protecting Tasmania's unique native wildlife, ecosystems and biodiversity from the introduction of exotic pathogens. Animal Care Australia also acknowledge the importance of reviewing existing import conditions in light of emerging scientific knowledge, improved diagnostic capabilities and previous detections of pathogens in Tasmanian captive snake populations.

Overall, Animal Care Australia considers the IRA a useful assessment. However, we recommend further consideration of several matters as outlined in the attached submission, before the proposed management measures are finalised.

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.

Kind regards,



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An Animal Care Australia submission

# Proposed changes to Tasmanian import conditions for live snakes

*Animal Care Australia (ACA) is a national incorporated association and registered charity representing the interests of animal keepers, carers, and breeders across a broad range of species.*

*Animal Care Australia 's purpose is to prevent and relieve animal suffering through education and advocacy, promoting responsible animal care and improved welfare outcomes. Established by experienced animal advocates, Animal Care Australia provides a trusted, evidence-based voice to government and the community.*

*Animal Care Australia brings together practical experience, species-specific knowledge and contemporary animal welfare principles. We advocate for evidence-based proportionate policies that focus on achieving genuine welfare outcomes for animals. We seek to ensure that the voices and experiences of responsible animal carers are considered in the development of effective animal welfare policy.*

*Animal Care Australia unites hobbyists, pet owners, and major animal groups to promote high standards of husbandry and safeguard the human-animal bond.*

*True animal welfare is best driven by education and practical expertise rather than restrictive regulation.*

*Our guiding principle is simple:* ***animal welfare is animal care***

**Submission approved: September 2026**

*This submission has been developed in consultation with a range of members of Animal Care Australia.*

*This submission provides a broad perspective across all species of pets and companion animals. Animal Care Australia supports the species specific submissions of our member organisations.*

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## Opening statement

As a nationally recognised animal welfare organisation, Animal Care Australia acknowledges the importance of the Import Risk Analysis (IRA) in identifying and assessing the biosecurity risks associated with the interstate importation of live snakes into Tasmania.

We support the objective of protecting Tasmania's unique native wildlife, ecosystems and biodiversity from the introduction of exotic pathogens. We also acknowledge the importance of reviewing existing import conditions in light of emerging scientific knowledge, improved diagnostic capabilities and previous detections of pathogens in Tasmanian captive snake populations.

Overall, Animal Care Australia considers the IRA a useful assessment. However, we recommend further consideration of several matters before the proposed management measures are finalised.

## Response to the Import Risk Analysis (IRA)

### Scientific evidence and uncertainty

The IRA acknowledges significant gaps in knowledge regarding the presence or absence of identified pathogens in wild Tasmanian snake populations. It also recognises that the susceptibility of native Tasmanian elapids to several identified viruses remains uncertain. Animal Care Australia support the recommendation for surveillance and testing of wild Tasmanian snake populations and encourage the identification of appropriate funding to undertake this research.

### Proportionality of import conditions

Animal Care Australia supports evidence-based biosecurity restrictions that are proportionate to the identified risks. However, the proposed restrictions on permitted snake species require further clarification and justification.

The assessment identifies varying levels of risk across the pathogens considered. Accordingly, restrictions should be supported by clear scientific evidence and should not extend further than necessary to achieve Tasmania's appropriate level of biosecurity protection.

### Animal welfare considerations

Animal Care Australia emphasises that biosecurity requirements must be implemented alongside appropriate animal welfare safeguards.

The proposed quarantine periods, repeated diagnostic testing, veterinary examinations and microchipping requirements should be designed to minimise unnecessary stress, handling and disruption to the health and welfare of individual animals.

Animal Care Australia recommend that testing and quarantine protocols be developed in consultation with both the zoo/wildlife park importing the snake and veterinarians experienced in reptile medicine, with appropriate species-specific husbandry, environmental conditions and veterinary oversight.

The IRA itself acknowledges that excessive testing may be detrimental to animal welfare. This consideration should be reflected in the final requirements.

## Practical implementation and unintended consequences

Animal Care Australia supports the IRA's recognition that excessively restrictive or costly import requirements could encourage illegal importation. Our position is it is more likely to encourage illegal activity.

Import requirements must be practical, accessible and enforceable. The availability of suitably qualified veterinarians, diagnostic testing, accredited source facilities and appropriate quarantine arrangements should all be considered when determining the final conditions.

Requirements should achieve meaningful biosecurity outcomes without creating unnecessary barriers for legitimate, responsible and appropriately licensed facilities.

## Consistency and ongoing oversight

Animal Care Australia supports consistent biosecurity and enclosure management standards across all facilities authorised to keep imported snakes.

We also support appropriate animal identification, veterinary oversight, record keeping, biosecure waste disposal and the investigation of unexplained deaths.

Animal Care Australia recommend establishing a clear process for periodically reviewing the IRA and associated import conditions as new scientific evidence, surveillance results and diagnostic capabilities become available.

Finally, we encourage continued engagement with specialist reptile veterinarians, licensed facilities, experienced reptile keepers, industry representatives and animal welfare organisations to ensure that the final requirements are scientifically robust, practical and consistent with appropriate animal welfare standards. Given the non-existence of expertise, as acknowledged within the IRA, this engagement should be far reaching across the mainland to ensure appropriate knowledge and input is achieved.

Animal Care Australia supports a precautionary, evidence-based approach to biosecurity that protects Tasmania's unique wildlife while ensuring that the welfare of individual animals and the practical realities of responsible captive animal management are not overlooked.

The document provides a useful assessment of the biosecurity risks associated with importing live snakes into Tasmania.

Animal Care Australia support the objective of protecting Tasmania's unique native wildlife from introduced pathogens. However, there are several areas where we seek clarification, stronger justification and consideration of animal welfare and practical implications before the proposed import conditions are adopted.

Importantly, Animal Care Australia support evidence-based biosecurity measures without unnecessarily compromising the welfare of captive reptiles or imposing restrictions that are disproportionate to the demonstrated risks.

## Key areas of feedback from Animal Care Australia

### Support for the risk assessment and its objectives

Animal Care Australia supports the review of existing import conditions, particularly given the previous detection of exotic viruses in Tasmanian captive snake populations despite existing quarantine and veterinary requirements.

We acknowledge the importance of protecting Tasmania's native snake species, broader wildlife populations and ecosystems from introduced pathogens.

We also support the use of veterinary expertise, appropriate diagnostic testing and improved biosecurity practices to minimise the likelihood of disease introduction.

### Scientific evidence and acknowledged uncertainties

The IRA identifies several significant limitations in the available evidence, particularly the absence of adequate surveillance and testing of wild Tasmanian snake populations.

The assessment acknowledges that the presence or absence of several pathogens in native Tasmanian snakes cannot currently be established with confidence.

Animal Care Australia considers it important that these knowledge gaps are clearly acknowledged when determining the level of risk and establishing import conditions.

In particular:

- The assumption that certain pathogens are absent from wild Tasmanian snake populations requires further investigation.

- The susceptibility of native Tasmanian elapids to several identified viruses remains uncertain.
- Further research should establish the potential for cross-species transmission and impacts on other native wildlife.
- Risk assessments should be reviewed as new scientific evidence and diagnostic capabilities become available.

Animal Care Australia supports the recommendation for surveillance of wild Tasmanian snake populations and considers appropriate funding should be identified to undertake this work.

## Proportionality of proposed import restrictions

Animal Care Australia supports appropriate restrictions where they are justified by demonstrated biosecurity risks. However, we seek further clarification regarding the proposed restriction of permitted imports to pythons and boids. The IRA identifies different levels of risk across the pathogens assessed, with some presenting negligible or very low risks and others requiring additional management measures.

The proposed restrictions should therefore be proportionate to the identified risks and supported by clear scientific justification.

Restrictions should not be broader than necessary to achieve Tasmania's appropriate level of biosecurity protection.

## Animal welfare implications of proposed conditions

Animal Care Australia considers animal welfare an important consideration in the development and implementation of biosecurity requirements.

The proposed conditions include:

- 90 days of pre-export quarantine.
- Veterinary examinations and certification.
- Multiple PCR tests for specified pathogens.
- Potential additional quarantine requirements.
- Microchipping of all imported snakes.

These requirements should be implemented in a manner that minimises unnecessary stress, handling, restraint and disruption to normal husbandry. Animal Care Australia particularly notes that the IRA itself recognises that excessive testing can be detrimental to animal welfare.

Animal Care Australia recommends:

- Testing protocols be developed in consultation with veterinarians experienced in reptile medicine.
- Quarantine facilities meet appropriate species-specific husbandry and welfare standards.
- Testing frequency and sample collection methods be supported by scientific evidence and minimise animal handling.
- Quarantine arrangements provide appropriate environmental conditions, nutrition and opportunities for normal behavioural expression, including where appropriate, quarantine being carried out at the site of the intended premises of the snake, in order to minimise excessive transporting and re-acclimation of the snakes.
- Humane treatment and veterinary intervention take precedence where an animal develops clinical disease during quarantine.

Biosecurity measures should protect both wildlife populations and the welfare of the individual animals subject to those measures.

## Practicality and unintended consequences of import requirements

Animal Care Australia notes the IRA's acknowledgement that excessively restrictive or expensive import requirements could encourage illegal importation. **This is an important consideration.**

The document identifies that illegal importation already occurs and that animals entering through illegal pathways may not have undergone appropriate disease screening or originated from well-managed captive populations.

Animal Care Australia considers that import requirements must be practical, achievable and enforceable.

Overly restrictive requirements will inadvertently undermine biosecurity objectives by encouraging illegal activity and reducing the incentive for prospective importers to use legitimate pathways.

Animal Care Australia recommend that the proposed requirements be assessed against:

- The availability and accessibility of appropriately accredited veterinary services.
- The availability, cost and reliability of diagnostic testing.

- The availability of suitable quarantine facilities.
- The practical ability of source facilities to meet certification requirements.
- The potential financial and administrative burden on legitimate licensed facilities.

There should be a clear distinction between requirements that are essential to managing identified biosecurity risks and those that are recommendations for improved captive animal management.

### Consistency of standards and accountability

Animal Care Australia supports the proposal that all facilities keeping imported snakes should comply with consistent enclosure, management and biosecurity standards.

Consistent standards are important to ensure that biosecurity outcomes are not dependent on the type of licence or business operating the facility.

Animal Care Australia also support appropriate record keeping, identification of individual animals, veterinary oversight, responsible disposal of waste and substrate, and investigation of unexplained deaths.

However, implementation requirements should be clearly documented, consistently applied and subject to appropriate oversight.

**Ongoing review and stakeholder involvement**

Animal Care Australia recommends that the final IRA establish a clear process for ongoing review. The document identifies that further research, surveillance and changes in scientific understanding may alter the assessed risks. Import conditions should therefore be reviewed periodically and when significant new evidence emerges.

We also recommend continued consultation with both Tasmanian-based AND mainland:

- Reptile veterinarians and veterinary specialists
- Licensed wildlife parks and exhibition facilities.
- Reptile industry representatives.
- Experienced reptile keepers and breeders.
- Wildlife health and biosecurity specialists.
- Animal welfare organisations.

This would help ensure that the final requirements are scientifically defensible,

practical and consistent with appropriate animal welfare standards.

## Response to proposed changes to import conditions for live snakes entering Tasmania

The IRA recommends the inclusion of the following measures **in addition to existing import requirements:**

- pre-import testing for four pathogens, which need to be addressed to meet Tasmania's minimum Appropriate Level of Protection (ALOP);
- Requirement for biosecure disposal of snake waste material from snake enclosures at Tasmanian facilities (e.g. faecal material and substrate) in a municipal waste facility; and
- only accepting the importation of individual snakes that have been proven to be:
    - from facilities that have high health monitoring standards as certified by a reptile experienced veterinarian; AND
    - from facilities that have not had any detected cases of infectious pathogens within the preceding 12 months.

**Animal Care Australia supports the proposed additional import conditions in principle.**

They provide a reasonable framework for reducing the risk of introducing infectious pathogens into Tasmania while allowing responsible, appropriately managed movement of live snakes. However, measures must be scientifically justified, consistently applied, practical to implement and developed with appropriate consideration for the welfare of the individual animals.

**Animal Care Australia supports the proposed additional import conditions in principle.**

We acknowledge and support the importance of protecting Tasmania's unique native wildlife, biodiversity and ecosystems from the potential introduction of infectious pathogens through the movement of live snakes. The proposed measures appear to provide an appropriate additional layer of biosecurity protection. However, their effectiveness will depend on clear requirements, practical implementation and ongoing review.

### Pre-import testing for four pathogens

Animal Care Australia supports the inclusion of pre-import testing for the four identified

pathogens: Nidovirus, Ranavirus, Mycoplasma and Cryptosporidium.

Testing requirements should be based on sound scientific evidence and appropriate diagnostic methods, with clear guidance about the timing, frequency and interpretation of results. In particular, the IRA recommends multiple tests at specified intervals for some pathogens. These requirements should be clearly communicated to importers and exporting facilities to ensure consistency.

Testing and associated handling should be undertaken by appropriately qualified professionals, with consideration given to minimising unnecessary stress and handling of the animals. Testing protocols should also be reviewed as diagnostic methods and scientific knowledge develop.

### Biosecure disposal of snake waste material

Animal Care Australia supports the requirement for biosecure disposal of snake waste material, including faecal material and enclosure substrate, through an appropriate waste facility.

This is a sensible preventative measure to reduce the potential for environmental contamination and pathogen transmission. However, the requirements should clearly explain what constitutes acceptable disposal, including any necessary containment, handling, and storage/final disposal arrangements.

Guidance should be practical and accessible to all relevant facilities and keepers, while ensuring that biosecurity objectives are not compromised. The requirements should also avoid unnecessary complexity or costs that do not provide a demonstrable biosecurity benefit.

### Importation only from facilities with high health monitoring standards and no detected infectious pathogens in the preceding 12 months

Animal Care Australia supports the principle of requiring imported snakes to originate from facilities with demonstrably high health monitoring and biosecurity standards, certified by a veterinarian experienced in reptile health. This approach places appropriate emphasis on the health status and management practices of the source facility; however, further clarification would be beneficial regarding:

- The minimum health monitoring and biosecurity standards that facilities must demonstrate.
- The qualifications and experience required of the certifying veterinarian.
- Which infectious pathogens are covered by the requirement that no cases have been detected during the preceding 12 months.

- What evidence and records must be provided to demonstrate compliance.
- How facilities that have previously detected a pathogen, but have subsequently implemented appropriate treatment, containment and monitoring measures, will be assessed, especially if those measures have resulted in no further evidence or detection of the pathogens for a considerable length of time (but less than 12 months)

Animal Care Australia considers it important that the 12-month requirement is clearly defined and applied proportionately. A previous detection should not automatically result in indefinite exclusion where the facility can demonstrate that the issue has been appropriately managed and that the relevant biosecurity risks have been addressed. Any such assessment must, of course, be supported by veterinary evidence and consistent with Tasmania's required level of protection.

### Practical implementation and animal welfare

Animal Care Australia encourages the Tasmanian Government to ensure that the proposed conditions are achievable for responsible importers, breeders and captive facilities, without compromising their intended biosecurity outcomes.

The cost and availability of reptile-experienced veterinarians, appropriate diagnostic testing and compliant source facilities should be considered when developing implementation arrangements. Requirements should be sufficiently clear to prevent inconsistent interpretation or unnecessary barriers to legitimate, responsible animal movement.

Importantly, biosecurity measures must be implemented in a way that safeguards the welfare of the individual snakes. Quarantine, testing, handling and transport arrangements should be appropriate to the species and undertaken by people with relevant reptile experience. Biosecurity and animal welfare should be treated as complementary objectives.

## Conclusion

Animal Care Australia supports the proposed additional import conditions as a precautionary and evidence-based approach to reducing the risk of pathogen introduction into Tasmania.

Animal Care Australia recommend that the final requirements include clear and measurable standards, practical compliance guidance, appropriate veterinary oversight and provision for periodic review as new scientific evidence becomes available. retain qualified support for all three proposed measures, while making one

point particularly clear: the 12-month pathogen-free requirement needs careful definition. A facility should not necessarily be permanently excluded because of a historical pathogen detection if it can demonstrate that the issue has been properly managed and that the relevant risks have been addressed. This does not mean relaxing biosecurity standards; it means ensuring decisions are based on current veterinary evidence and the actual risk.

Animal Care Australia's position is that good biosecurity and good animal welfare should operate together, rather than one being pursued at the expense of the other. Effective biosecurity should protect Tasmania's native wildlife and ecosystems while also supporting responsible, high-welfare captive animal management. The proposed measures should achieve both objectives without introducing unnecessary or disproportionate restrictions on legitimate animal movement.

Animal Care Australia welcomes any questions you may have as you continue to finalise this review. We welcome the opportunity to meet with the department in order to ensure an appropriate animal welfare considerations are included.

This submission can be published in full on the website including the signatory's name.

On behalf of the Animal Care Australia Committee,



Michael Donnelly
President
Animal Care Australia

## About Animal Care Australia

As a nationally recognised animal welfare organisation and Australian Registered Charity, 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, animals used for educational or entertainment purposes or kept for conservation, and in particular native birds, reptiles, and mammals.

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