

Committee Secretary □  
Senate Standing Committees on Environment and Communications □  
PO Box 6100  
□ Parliament House  
□ Canberra ACT  
2600 □ Australia

Greg Miles  
Wildlife Conservation Lobbyist  
PO Box 2219  
Humpty Doo  
NT 0836  
Phn. 08 89885692  
13 December 2012

## **Inquiry into the effectiveness of threatened species and ecological communities' protection in Australia**

Dear Committee Members

Two days ago I sent a submission to you. After sleeping on it I realised that it would be helpful for the committee if I highlighted and summarized my recommendations.

I have done this with this version dated with today's date, the 13<sup>th</sup> December 2012. The two attachments that I sent on the 11<sup>th</sup> are still valid and are intended to accompany this version.

Regards

GLM  
13 December, 2012

---

Please find below my submission to this inquiry.

### **Introduction.**

I write from the perspective of a retired Federal Government protected area land manager with 30 years experience in the northern savannas (1974 – 2004) and as a former Government Conservator on Christmas Island (1989 – 1992). My earlier working life included management of native and exotic animals in three of Australia's leading zoological institutions. (1967 – 1974)

I also write on the basis of the following assumptions:

1. Many species of Australian native animals and plants are in decline with dismal prospects for a reversal in their fortunes.

2. That environmental destructors such as many feral animal species, invasive species and uncontrolled fire are increasing in their impacts on the natural environment and that there is little that can be done to put an end to this.
3. That although our national reserves scheme is precious, it is not doing a good job of protecting and nurturing most threatened and near threatened species.
4. That our national and state legislation governing wildlife management and licensing is a mess and has little hope of offering improved prospects for wildlife conservation in this country.
5. The comments below concern Australian native animals, not plants.

**Terms of reference:**

(a) management of key threats to listed species and ecological communities;

I have no particular comment on this issue.

(b) development and implementation of recovery plans;

It is my view that the current system is inadequate for the growing task at hand. There is an urgent need for the creation of a high profile national and independent body to oversee endangered species activities including the development and implementing of recovery plans. The Threatened Species Committee, which writes recovery plans could be this body, provided it is kept at arms length from all Governments. It should receive untied funding from all Federal, State and Territory Government conservation agencies. It should also be free to receive donations from other sources where there is no conflict of interest. There should be a permanent secretariat and the committee should meet regularly in all states and territories. These meetings should coincide with a conference or symposia where national and regional conservation bodies can report to the committee and to one another. This committee needs the legislative strength to be able to take Federal, state and Territory conservation agencies to task in public hearings. This committee needs to have a high public profile and produce media items on a regular basis. Newly drafted management plans should be presented to the public and other stakeholders at the conferences. The committee can take public input at those presentations. The committee will have a web site on which all recovery plans can be displayed. The web site could be so structured that the public can add sightings and make other comments during the life of the recovery plans. Recovery plans need to be more imaginative in their adoption of novel and new methodologies. E.g. early referral to captive breeding and more use of predator and fire proof exclosures. (More on this below).

**Recommendation 1.** *That the Threatened Species Committee be the nucleus for a well resourced and greatly revamped Committee with a permanent office and support staff. They should be completely independent of any Government, have wide terms of reference and the legal ability to hold Government and NGO conservation agencies to account. The composition of the Committee should primarily be composed of conservation biologists, captive breeding experts and experienced protected area land managers from both Government and private sectors, including biodiversity academics.*

(c) **management of critical habitat across all land tenures;**

I have no particular comment on this except to say that the Kakadu that I retired from in 2004, was in a worse state of environmental condition than the one that I found when I commenced work there in 1976. (and that is allowing for the presence of some 60,000 buffalo at the outset). In other words, despite the work of 50 or so dedicated Rangers, carefully written management plans and the expenditure of more than \$200 million dollars, wildlife in Kakadu went from wonderful to woeful. That says it all basically! From that, you could guess that I do not have any confidence that the recently conceived concept of “Bioregional Corridors” are likely to have much conservation benefit – for threatened species at least.

**Recommendation 2.** *That a note of reality be injected into the effectiveness of landscape scale habitat management is for threatened species. IE, from this writer’s point of view, it is unlikely that habitat management is going to improve the situation in the wild for many species. Other new and novel methods must be trialed/enacted.*

(d) **regulatory and funding arrangements at all levels of government;**

It goes without saying that regulatory and funding arrangements for nature conservation in this country are inadequate for the task. Much has been written on this already. Most Government departments (in part because of their antiquated legislation) remain locked into the old and now redundant ideology that tells them that only Government can own wildlife. This is a core part of the problem of wildlife conservation in Australia today. There is an urgent need to overhaul environmental laws and policies at every level of Government. Although Government rhetoric frequently calls for more community participation in nature conservation, their aging laws and policies are inclined to do the opposite. In the modern world, many aspects of Government conservation legislation and policies are in conflict with contemporary knowledge and can have the counter intuitive affect of further endangering rare wildlife rather than protecting it. An example are policies which prevent the private sector from keeping, breeding and trading in rare fauna, that is declining in the wild. EG in the Northern Territory, Cane Toads, cats, fire and other factors have destroyed about 90% of the population of Phascogales in the past 15 years. And yet if a family were found to be successfully keeping and breeding Phascogales in captivity without a permit (which is near impossible to obtain) they would be threatened with court action. This is a special kind of madness. Instead, the Government should be encouraging people to keep, breed and trade in Phascogales (and other declining wildlife which does well in captivity) as a conservation strategy.

**Recommendation 3.** *That all Governments reinstate effective funding to all levels of nature conservation under their control. That there be a ‘whole of Government’ approach to managing invasive species.*

### **Wildlife licensing and captive breeding of threatened species**

Most state and territory Govt. conservation agencies are buckling under the growing weight of an unwieldy and largely irrelevant wildlife possession licensing system. Most jurisdictions allow the keeping of some common native animals. Despite restrictive conditions, the number of people in this country who wish to keep native animals continues to grow strongly. It is estimated that there are about 60,000 licensed native animal keepers in Australia. These numbers include keepers of birds, mammals, reptiles and fishes. In most states the licensing of the keeping of common animals is an expensive and ongoing activity for the governing agency and with almost zero conservation benefit. But paradoxically the keepers of these animals annually pay out tens of millions of dollars on their hobby. A significant amount of this money (and potentially much more) could be redirected to give positive conservation outcomes if Government agencies changed their laws and policies. If suitable people were actively encouraged and fostered in the keeping of Threatened species (which can reasonably be kept in captivity – e.g. NOT things like sea birds or waders) then an avalanche of money and manpower could be unleashed. But at the present time, Governments are more likely to smile on people who keep wildlife killing cats and dogs, and prosecute people who keep and breed quolls and Phascogales. There is obviously something seriously wrong in such a situation. To put it another way, a person can own a cat, which roams at will and kills a native marsupial such as a Quoll or Phascogale each night. There is no law against this. But if those same people kept and bred Quolls or Phascogales - instead of a cat - without a permit (and permits are not issued for native mammals in most states) they would be taken to court. Where is the logic in this?

Thought needs to be given to uncoupling, from the permit system, a whole range of native animals which need not appear on the Parks & Wildlife books. I suggest that a wide range of common and/or easy to keep species can be kept, bred and traded without any permits at all. This will be the “Beginners and Kids List” and regulation of it will basically be at an animal welfare level, as with all domestic pets. These beginners will develop their animal husbandry skills with common native animals. Over time, with experience, they will become equipped to join an ever growing army of highly experienced people who are more than capable of keeping and breeding threatened species. At the moment, our legal regime is doing the opposite. It is holding back this potentially enormous number of people who could contribute to the conservation effort.

At the opposite end of the keeper’s spectrum I propose a new, top rung in the Wildlife Keepers hierarchy, as defined by the various state wildlife agencies. This new, elite classification would be called Conservation Keepers or Wildlife Heritage Keepers. These highly experienced and motivated people will be like auxiliaries to the Parks and Wildlife Service itself. They will be the first recipients of rare and endangered species for captive breeding and will not engage in any form of hybridization of target species. They will work hand in hand with the biologists, permits and compliance people in the park service. Ultimately, surplus animals produced by Conservation Keepers can be on sold to people in the next most senior

level in the Wildlife Keepers hierarchy. Sales may well be facilitated or overseen through the Parks and Wildlife bureaucracy. The Conservation Keepers will be clear beneficiaries of these sales. Permits will apply to threatened species in private hands. Conservation keepers will be totally unlike conventional pet owners and will not engage in morphing or hybridizing high conservation value species without jeopardizing their elite (and valuable) status.

The permit regime of every state and Territory Park Service is set up to protect wildlife from threat – and ultimately from extinction. This should not be confused with protecting individual animals from harm. This is the role of animal welfare agencies such as the RSPCA. State and Territory P & W Services do not have the resources to deal with this. If they attempt this role, then we would expect to see a diminution of their effectiveness in protecting species in favor of protecting individuals. In other words, common native animals, which are not in need of conservation protection, should not be a primary responsibility of the Government agencies charged with the protection of wildlife. This idea has been taken one step further in Western Australia where that state's Department of Environment and Conservation was criticized by the W. A. Auditor General, who found that spending limited time and money on the protection of Critically Endangered species was taking resources away from much more viable conservation of less threatened species. See ([http://www.audit.wa.gov.au/reports/pdfreports/report2009\\_05.pdf](http://www.audit.wa.gov.au/reports/pdfreports/report2009_05.pdf)) I argue that threatened species should be placed into captive breeding situations long before they become critically endangered. However, I also argue that many critically endangered species would flourish in the hands of experienced private wildlife keepers, at little expense to the Government.

If the private sector did keep large numbers of native animals (Including threatened species), how would the record books be maintained? This issue could be addressed in part by the Internet. There is a need for a national Wildlife Keepers web site. At an overarching level, the Federal Government could run this. Within this site would be the appropriate home pages of all the state and territory wildlife agencies. In turn, their sites would carry all of the necessary information and links that would be needed by people who keep native animals.

In Australia there would be hundreds of thousands of people who would like the opportunity to keep Australian native animals if they were permitted to do so, and if they were assisted in doing so by the relevant Government agency. Rather than being legally quarantined from wildlife (as our laws mainly do at the moment) if people were nurtured in the keeping of native animals, we would be able to build a vast network of expert native animal breeders and carers. Not only would this spawn multi million dollar business opportunities, (opportunities which under the current legal regime are only available to animal traffickers and breeders in foreign countries) but in the process, we would be making many Threatened Species 'extinction proof' at minimal cost to any Government jurisdiction. The story of the Rough Scale Python and the Wollompi Pine are examples of this. But, current laws and policies are keeping all that money and manpower away from any conservation effort. Instead it falls almost exclusively onto the various Government's mean and

meager pockets to fund Threatened Species conservation – and this is not working. I attach a document that I have written that expands on captive breeding in the private sector as a conservation strategy. It is called, “***Our wildlife is not safe in the bush.***”

***Recommendation 4.*** That all Federal, state and territory jurisdiction carry out a radical review of their laws, policies and actions in the area of wildlife conservation including licensing. These reviews should be pre-eminently underwritten an aim to improve the conservation security of wildlife (plants and animals) in general and threatened species in particular.

***Recommendation 5.*** That all jurisdictions abolish the need for people to have permits to keep common native animals. Instead, all jurisdictions institute a new regime of wildlife licensing which fosters, and encourages experienced keepers (individuals and organisations) to keep, breed and trade n threatened species.

***Recommendation 6:*** That all jurisdictions create a new category of Conservation Keepers who will keep control of the core populations of pure-breed native animals. They will be permitted to on-sell threatened wildlife to suitable advanced keepers.

***Recommendation 7.*** That all jurisdictions set up a web based management and support network for keepers of threatened species nation wide.

### **Wildlife licensing compliance**

This area of Government endeavor needs a major overhaul. It has got to the point where many P&W agencies around Australia cannot see the wood for the trees. In many states there are heavy-handed compliance officers who intimidate licensed native animals keepers at great expense to the Government. But in most cases, the animals being kept are of little of no conservation significance to that state or anywhere. At the same time, Government funding to national parks and conservation reserves in those same states is shrinking, or being effectively eroded by things such as OH&S and co- management. But it is in these reserves that the real conservation of species should be occurring. In other words, rare Government money and effort is being wasted on largely pointless compliance activities. The priority should always be focused on nature conservation, not irrelevancies such as whether or not someone has renewed their permit to keep pet Bearded Dragons or Carpet Snakes. There have been inquiries into this and a number of papers written pointing out the illogicality of this – but nothing changes. See: *Australia's regulation of commercial use of wildlife: an absence of eco-logic*. Linda L. Tucker, University of Wollongong, 2008. <http://ro.uow.edu.au/theses/789/>

See also: *Australian Native Mammals as Pets. A feasibility study into conservation, welfare and industry aspects*. By Rosie Cooney, Rosalie Chapple, Sarah Doornbos and Stephen Jackson. Institute of Environmental Studies, University of New South Wales <https://rirdc.infoservices.com.au/items/10-072>

See also: *Commercial and Sustainable Use of Wildlife -Suggestions to improve conservation, land management and rural economies* by Rosie Cooney 2008  
<https://rirdc.infoservices.com.au/items/08-199>

**Recommendation 8.** *That all jurisdictions review their wildlife licensing departments with the view to determine what role they play in the conservation security of wildlife in general and threatened species in particular. Those elements which are found to be redundant, can be redirected to assisting people to successfully keep, breed and trade in threatened species where the conservation security (extinction proofing) of those species is enhanced.*

### **Government self-awareness.**

Government needs to recognise that the current regime is not working. It is apparent to all informed observers that Governments alone cannot turn back the rising tide of threatened species. But legislation and government policies do not reflect this reality. Most Government agencies appear to be blinded in a cloud of self-denial, resembling an ostrich with its head in the sand. Most P & W agencies are calmly saying to the public “*Trust in us, everything is under control.*” Where in truth, things have probably never been less under control in Australia’s conservation history. Governments are still trying to go it alone and in some cases are actually refusing help from the private sector. In a 'frog in boiling water' scenario, Government conservation agencies seem to be resisting the rising tide of evidence that the private sector has a far higher rate of conservation success on a dollar per outcome measure. (Ref, Flannery in *The Quarterly Essay*, November 2011) We cannot move forward until all sectors of government agencies acknowledge that they need to co-operate with the private sector to be effective. This might require some painful radical surgery to sections of the wildlife licensing and compliance departments. It may also require a subtle shift in the outlook of many of the Government Conservation biologists.

**Recommendation 9.** *That the newly revamped Threatened Species Committee should embark on a program of training courses for the Federal and state wildlife conservation agencies. These courses would assist the staff in those agencies to understand what it is they there are there to do. This writer is convinced that many bureaucrats in Government circles have lost the basic understanding of what their purpose is.*

### **The world view of Government Conservation Biologists**

These are a wonderful bunch of people and we need more of them. But they are mainly out of the same box and have very similar histories and skill sets. For the most part they are grounded in field biology. I.e. research, surveys and monitoring of animal and plant populations in the wild. Many of them are not strong in the area of “**What’s next**” after research and surveys show a continuing decline in a plant or animal in the wild. Their most common response is to intensify surveys and monitoring. But as was painfully shown with the example of the now extinct Christmas Island Pipistrelle, survey and monitoring does not save species. At the

top level of conservation policy maker groups there must be experts in the area of captive breeding. These are people from zoos and wildlife parks. If captive breeding experts were at the table when the Pipistrelle was first flagged for action – we may still have it today. It is as plain as the nose on your face that captive breeding as a conservation strategy (anti-extinction strategy) must come to the center of all forward policy directions. For an increasing list of Australian native animals, captive breeding, along with “Island Arks” and predator proof enclosures, are the only hope that they have to escape the omnipotent clutches of extinction.

**Recommendation 10.** *The new Threatened species Committee needs to possess a wide breadth of experience and knowledge. Conservation biologists alone should not be the decision makers. Decision-making needs also to have input from captive animal husbandry experts and experienced protected area land managers from both the private as well as Government sectors. For the most part none of these groups have much knowledge of the enormous advances that have been made in the arena of the others. Captive breeding specialist probably don't know much about remote camera traps that the biologists use, and they in turn probably have limited knowledge of the dramatic advances in captive husbandry of all classes of animals. Similarly, neither of these two would have a great deal of knowledge of the practical difficulties facing the modern natural area land manager.*

#### **Placing emphasis on the private sector.**

In Australia, the conservation dollar and effort needs to be split into the two camps. Part to the Government reserves scheme and part to the NGO conservation agencies. Examples of these are Bush Heritage, The Myer Foundation, The Australian Wildlife Conservancy and many others. In many cases the Government conservation agencies need to get out of the way of these NGO's so that they can work their successes without hindrance from the Government. Increasingly it is the private sector that is getting the runs on the board, leaving the Government in its wake. There urgently needs to be a new peak national NGO representative body created that sits together on a regular basis. This body would be comprised of NGO agencies (big and small) sitting on equal terms with state and federal conservation agencies. This body should have information exchange conferences which give a voice to the full gamut of wildlife conservation stakeholders including zoos, wildlife parks and public aquaria, as well as peak wildlife keepers organizations such as the avicultural, herpetological, aquarium fishes and mammal enthusiast communities. It is noteworthy that these wildlife enthusiast groups have provided more published knowledge of much of our wildlife than any other source.

**Recommendation 11.** *Government funding bodies need to recognise that biodiversity conservation dollars have more spending power when put through the NGO sector than through Government conservation agencies. Allocation of nature conservation money should reflect this. In addition, there needs to be a loosening up of Government red tape in order that NGO conservation agencies can operate to their full capacity.*

### **Predator and fire proof enclosures**

A review of the trajectory of threatened species conservation in this country quickly tells us that things are not getting better. This was highlighted in the “2011 State of the Environment Report.” Coupled with this, is the evident inability of governments to respond adequately at the ‘palliative care end’ of a species existence. The rising tide of species being added to the threatened species list is only going to accelerate. Governments don’t really know what to do, as wildlife heads inexorably towards extinction’s waiting room. Because this scenario is going to rapidly increase over the decades to come, it is critically important that we get this end of nature conservation sorted out. One practical and tangible method should be the widespread use of predator and fireproof enclosures. For many threatened species in Australia these bio-regionally positioned ex-closures will be the only secure place in which they can exist. These enclosures would be linked with suitable people in the private sector breeding rare species of vertebrates. This wide genetic pool of captive animals will then be available for re-introductions, climate inspired trans locations and infusing new blood into the ex-closure colonies. Obviously free flying birds would not be a feature in these ex-closures, but most terrestrial animals - and rare plants would be.

People keeping and breeding these rare animals will pay a royalty (permit) fee. This fee will contribute to the cost of construction and maintenance of the enclosures. These people will also be encouraged to join a volunteer loyalty scheme whereby they travel to the locations and assist with work around the enclosures. They would have a sense of ‘ownership’ of the project as their pets would be a link in the chain of conservation of the animals living a happy life within the enclosures. The ex-closures should be of a size whereby tourists will happily pay to be taken on guided walks (preferably with indigenous guides) through a reconstruction of the nature of Australia - before the whitefellas. Such ex-closures would be like a mini wildlife park within a national park and become a highlight of a visit to national parks like Kakadu. At present, visitors have almost no chance of seeing rare wildlife in their national parks – including Kakadu.

**Recommendation 12.** *That all Government conservation agencies bring their policies actions and staff up to date with the reality that predator and fire proof enclosures (along with island arks) are the most solid form of extinction proofing on offer into the foreseeable future. All Federal, state and territory agencies need to begin implementing a web of such enclosures, on a trial basis, as a matter of urgency. The sandstone environment in Kakadu might be Australia’s most pressing location for such enclosures.*

### **Island arks.**

Right around Australia there are threatened species existing on offshore islands but are extinct or heading that way on the mainland. If there is not already a national strategy concerning the vital importance of these then there should be. There must be an overarching (federal - not state and territory) approach to securing the conservation potential of islands (and mainland peninsulas that can in effect be

made into islands by fencing). Such islands need to be given a high priority of protection and rare species on the mainland reintroduced to them wherever appropriate.

**Recommendation 13.** *The Federal Government needs to urgently work with states to identify islands and suitable peninsulas to prioritise their conversion to predator free sanctuaries.*

### **The Precautionary Principle (PP)**

The PP as defined in the EPBC needs to be writ large across all sectors of the Australian conservation community. I believe that most Government agencies are far too conservative and hesitant about taking direct action to rescue species. There are Government agencies working in contradiction to the PP and in taking so long in doing so, are likely to lose species before they can be saved.

**Recommendation 14.** *As part of the retraining of Government bureaucrats, all people involved in nature conservation be educated as to the meaning of the Precautionary Principle. Parks Australia for example are using it in the reverse context to its intention.*

### **Tax relief for donors and NGO's.**

I am not familiar with the tax arrangements of NGO conservation agencies but they should be eligible for tax relief. People donating money to such bodies should also be able to deduct such donations from their taxable income.

**Recommendation 15.** *A review of tax arrangements be undertaken to minimise the tax burden on NGO conservation bodies and their donors.*

(e) **timeliness and risk management within the listings processes;**

I have no comment on this section.

(f) **the historical record of state and territory governments on these matters;**

I believe that it would be generally accepted that the record of Govt. instrumentalities has been patchy at best and is getting worse. I was at a national IUCN Symposium at Adelaide in April of this year (2012) where every state national parks and wildlife agency that attended, gave a presentation in which they declared that their state was going backwards in terms of nature conservation successes.

It also seems to me that all state nature conservation agencies are being starved of funds in the past decade or so. The poverty of Government conservation agencies is at crisis point in some states. It is a shocking scenario where the number of environmental problems is growing, but at the same time the income stream and funding for agencies is shrinking.

### **The historical downward trajectory of endangered species and how it can be reversed.**

For those endangered species that are subject to a rescue plan (and most are not) the trajectory is generally similar.

***This is broadly what happens today; 15 steps to lose a species, Scenario 1:***

1. Somebody discovered that a vertebrate species is not as common as it once was.
2. Govt. biologists are sent to investigate using surveys and monitoring.
3. It is confirmed that this species is now rare so surveys and monitoring are intensified.
4. A recovery plan is written
5. The recovery plan gathers dust.
6. Some community group such as the Aust. Bat Society gets involved and start making noises that the Minister hears.
7. More people become involved in surveys and monitoring.
8. All the evidence points to the species becoming critically endangered
9. It is declared critically endangered.
10. Meetings are held to work out what to do next.
11. Work on habitat improvement is proposed and recommendations produced.
12. Inadequate works are done to try to improve the habitat and the species continues to decline.
13. Captive breeding is proposed but there is inadequate funding.
14. Biologists fail to find sufficient specimens to establish a genetically viable captive colony.
15. The species goes extinct or hovers on the edge of extinction in the wild in tiny numbers – until they too disappear. Few people mourn the loss of the species because there was minimal community involvement and few learn of its demise.

***This is what should happen; 15 steps to save a species, Scenario 2:***

1. Somebody discovered that a vertebrate species is not as common as it once was.
2. Biologists note that a species is in decline, and list it as near threatened or Vulnerable. It is at this early stage that a species must be taken into captive breeding – not left till the Critically Endangered stage.
3. If the species lends itself to captivity, the Governing department calls for expressions of interest from suitable organisations and individuals to establish breeding populations in captivity.
4. The winning contractors could be called Conservation Keepers or Heritage Keepers.
5. The Governing agency provides assistance in the collection and transport of the specimens.
6. As part of the collection strategy, a wide spread of genetic variability is incorporated.
7. Homogenous genetic populations could be kept by several different Conservation Keepers for trans genetic infusion into the total captive population at a later time.
8. Conservation Keepers are permitted to breed as many individuals as they choose and can on-sell surplus stock to Advanced Keepers in the wider native animal enthusiast community.

9. Animal husbandry experts and vets are on call to provide expert advice to the keepers. This knowledge is then conveyed down the line to any new person purchasing any of these particular animals.
10. As the captive population builds in the private sector (at little or no cost to the Government), the Governing agency continues with traditional methods of conservation in the wild. But they know that the species is secure in the captive colony.
11. Owners of these rare species will feel part of a community conservation effort and may well volunteer their time to help the agency with its field management.
12. Predator and fireproof enclosures are built in prime habitat of the species in question.
13. High quality specimens from the Conservation Keepers collections are used to 'seed' the enclosures. Other compatible species of rare or threatened plants and animals are added to the enclosures.
14. Once populated with rare plants and animals the enclosures become an environmental tourist attraction with night and day guided walks provided for a fee.
15. The wider communities, who are keeping these rare animals, are also encouraged to give of their time in volunteering to help with the on-going maintenance and public services associated with the enclosures. They will feel involved in, and part of, an important conservation action.

The end result of these two scenarios could not be more different. Scenario 2, involving the private sector, offers real conservation benefits for a range of species at minimal cost to the taxpayer. The current and established scenario 1, is expensive for cash strapped Government agencies, mainly locks out community involvement and promises only doubtful results.

**Recommendation 16.** *Scenario 2 as shown above (or a version of it) should be used as the template for future actions concerning Australian threatened animals.*

### **Parks Australia as a case study in conservation incompetence.**

I have attached a PDF of a PowerPoint presentation. In it I examine the failings, in terms of endangered and endemic species conservation, in Kakadu National Park. The local Aboriginal people, and Parks Australia administer Kakadu jointly. Parks Australia is a branch of the Federal Department of Sustainability, Environment, Water, Population and Communities. At the end of this presentation I make a strong argument that Parks Australia's policies and practices are so flawed, that endemic and Threatened Species in Kakadu, would in fact enjoy more conservation security if they existed on a neighboring pastoral property, rather than within the World Heritage listed Kakadu National Park.

**Recommendation 17.** *Parks Australia's conservation policies and actions need to be the subject of an independent review. The new Threatened Species Committee or some similar expert body could do this review, which is at arms length from the Federal Government. Maybe the Federal Auditor General could do this, drawing on expert*

*independent experts.*

### **Indigenous participation in nature conservation.**

Another burden which Government conservation agencies increasingly have to bear, is that of co-management with indigenous people. Although I support the participation of indigenous people in nature conservation, everybody must recognise that this is a cripplingly expensive way to manage land for conservation. It costs about 50% more to run a co-managed national park compared to a conventional one. Little if any of that extra cost results in a measurable conservation benefit. As more and more nature reserves across Australia enter into co-management, one can predict that the nature conservation potential of these properties will fall. This is due to limited operating funds being diverted away from conventional conservation activities, and into newly emerging issues such as self-determination, social issues and out-station support.

**Recommendation 18.** Governments of all flavors must recognise the extra expense in both time and money that is required to run a co-managed national park. On the day that co-management is finalized the responsible Government should increase that park's budget by at least 50%.

### **Accountability**

I agree with Tim Flannery and others who point out that there is no accountability on the Government conservation agencies if and when a plant or animal is added to the Threatened Species list or when a species becomes extinct. This is a serious flaw. What kind of company could go bankrupt with no negative consequences for the owners/managers? This blame free status, which Government conservation agencies possess, must end. There has to be real accountability.

**Recommendation 19.** *There must be some form of accountability for species loss of terminal decline. Maybe the revitalized Threatened Species Committee could deal with this.*

Sincerely

Greg Miles  
Wildlife Conservation lobbyist  
PO Box 2219  
Humpty Doo  
NT 0836

13 December 2012

## **Attachments:**

### ***“Our wildlife is not safe in the bush. The rush to relevance of captive breeding.”***

A document I have written that proposes a new way of doing conservation business by reversing Governmental attitudes to the private sector keeping, breeding and trading in Australian wildlife.

***“The Conservation Crisis in North Australia. The Kakadu case study.”*** This is a PDF of a PowerPoint presentation that I have recently prepared and delivered to the NT Field Naturalist Club. It examines management practices and policies in terms of conservation on rare endemic and Threatened Species in a federally administered national park. It suggests that if the Federal Department can get wildlife conservation so wrong, what message does this send to the states.

## **Summary of recommendations:**

***Recommendation 1.*** That the Threatened Species Committee be the nucleus for a well resourced and greatly revamped Committee with a permanent office and support staff. They should be completely independent of any Government, have wide terms of reference and the legal ability to hold Government and NGO conservation agencies to account. The composition of the Committee should primarily be composed of conservation biologists, captive breeding experts and experienced protected area land managers from both Government and private sectors, including biodiversity academics.

***Recommendation 2.*** That a note of reality be injected into the effectiveness of landscape scale habitat management is for threatened species. IE, from this writer's point of view, it is unlikely that habitat management is going to improve the situation in the wild for many species. Other new and novel methods must be trialed/enacted

***Recommendation 3.*** That all Governments reinstate effective funding to all levels of nature conservation under their control. That there be a 'whole of Government' approach to managing invasive species.

***Recommendation 4.*** That all Federal, state and territory jurisdiction carry out a radical review of their laws, policies and actions in the area of wildlife conservation including licensing. These reviews should be pre-eminently underwritten an aim to improve the conservation security of wildlife (plants and animals) in general and threatened species in particular.

***Recommendation 5.*** That all jurisdictions abolish the need for people to have permits to keep common native animals. Instead, all jurisdictions institute a new regime of wildlife licensing which fosters, and encourages experienced keepers (individuals and organisations) to keep, breed and trade n threatened species.

**Recommendation 6:** *That all jurisdictions create a new category of Conservation Keepers who will keep control of the core populations of pure-breed native animals. They will be permitted to on-sell threatened wildlife to suitable advanced keepers.*

**Recommendation 7.** *That all jurisdictions set up a web based management and support network for keepers of threatened species nation wide.*

**Recommendation 8.** *That all jurisdictions review their wildlife licensing departments with the view to determine what role they play in the conservation security of wildlife in general and threatened species in particular. Those elements which are found to be redundant, can be redirected to assisting people to successfully keep, breed and trade in threatened species where the conservation security (extinction proofing) of those species is enhanced.*

**Recommendation 9.** *That the newly revamped Threatened Species Committee should embark on a program of training courses for the Federal and state wildlife conservation agencies. These courses would assist the staff in those agencies to understand what it is they there are there to do. This writer is convinced that many bureaucrats in Government circles have lost the basic understanding of what their purpose is.*

**Recommendation 10.** *The new Threatened species Committee needs to possess a wide breadth of experience and knowledge. Conservation biologists alone should not be the decision makers. Decision-making needs also to have input from captive animal husbandry experts and experienced protected area land managers from both the private as well as Government sectors. For the most part none of these groups have much knowledge of the enormous advances that have been made in the arena of the others. Captive breeding specialist probably don't know much about remote camera traps that the biologists use, and they in turn probably have limited knowledge of the dramatic advances in captive husbandry of all classes of animals. Similarly, neither of these two would have a great deal of knowledge of the practical difficulties facing the modern natural area land manager.*

**Recommendation 11.** *Government funding bodies need to recognise that biodiversity conservation dollars have more spending power when put through the NGO sector than through Government conservation agencies. Allocation of nature conservation money should reflect this. In addition, there needs to be a loosening up of Government red tape in order that NGO conservation agencies can operate to their full capacity.*

**Recommendation 12.** *That all Government conservation agencies bring their policies actions and staff up to date with the reality that predator and fire proof enclosures (along with island arks) are the most solid form of extinction proofing on offer into the*

*foreseeable future. All Federal, state and territory agencies need to begin implementing a web of such exclosures, on a trial basis, as a matter of urgency. The sandstone environment in Kakadu might be Australia's most pressing location for such exclosures.*

**Recommendation 13.** *The Federal Government needs to urgently work with states to identify islands and suitable peninsulas to prioritise their conversion to predator free sanctuaries.*

**Recommendation 14.** *As part of the retraining of Government bureaucrats, all people involved in nature conservation be educated as to the meaning of the Precautionary Principle. Parks Australia for example, are using it in the reverse context to its intention.*

**Recommendation 15.** *A review of tax arrangements be undertaken to minimise the tax burden on NGO conservation bodies and their donors.*

**Recommendation 16.** *Scenario 2 as shown above (or a version of it) should be used as the template for future actions concerning Australian threatened animals.*

**Recommendation 17.** *Parks Australia's conservation policies and actions need to be the subject of an independent review. The new Threatened Species Committee or some similar expert body could do this review, which is at arms length from the Federal Government. Maybe the Federal Auditor General could do this, drawing on expert independent experts.*

**Recommendation 18.** *Governments of all flavors must recognise the extra expense in both time and money that is required to run a co-managed national park. On the day that co-management is finalized the responsible Government should increase that park's budget by at least 50%.*

**Recommendation 19.** *There must be some form of accountability for species loss of terminal decline. Maybe the revitalized Threatened Species Committee could deal with this.*

ooooo000ooooo