

**WESTERN AUSTRALIAN  
SOCIETY OF AMATEUR HERPETOLOGISTS Inc.  
(WASAH)**

**SUBMISSION**

**to**

**DEPARTMENT OF CONSERVATION & LAND  
MANAGEMENT  
(CALM)**

## INTRODUCTION

Over half of WASAH's one hundred or so members have expressed an interest in keeping, therefore we are committed to improving the chances of this being realised in Western Australia.

This submission is the second made by our society (see 1991 Sub.) and follows further discussions between representatives from CALM and WASAH and suggests changes to the Western Australian Licensing Regulations and Policy (No. 22) concerning amateur herpetology (keeping reptiles and/or amphibians for private purposes). These changes would bring Western Australia into line with the other Australian states and territories.

Currently CALM policy allows amateur herpetology only if it includes private research. It all but prohibits the keeping of reptiles and amphibians by amateurs for any other purpose, apart from temporary involvement in the rehabilitation of injured herpetofauna {Wildlife Regulations Part 4: 28 (2)}. A few licences have been issued in the past to keep derelict herpetofauna unable to be successfully rehabilitated.

This situation is unique to Western Australia. All other Australian states and territories allow keeping purely for the sake of keeping. NSW National Parks and Wildlife Service currently has an amnesty in place to allow keepers to licence their stock further improving the situation for NSW residents wishing to keep.

CALM's reluctance to issue licences to hobbyists is related to the lack of specific guidelines within the current regulations for this; and the costs of managing and monitoring.

In this submission WASAH seeks to provide both a methodology and an operational outline on how we perceive a new system would operate. As CALM will be the administrator, all fees referred to in the following are to be collected by that department.

## LICENCES

WASAH would like the establishment of a system whereby there is access by amateurs to annually renewable *keepers'* licences (or equivalent) to allow the keeping and breeding of reptiles and amphibians.

We envisage a two-tiered licensing system whereby inexperienced keepers and children will be prohibited from keeping dangerously venomous or difficult to maintain species. The respective lists to be determined through discussion between CALM and WASAH.

A nominal fee will be charged for both licences with the specialist licence to be a greater amount than the other. As well as this nominal fee there will be an establishment fee for new licences issued. These fees to be determined through discussion between CALM and WASAH, although CALM may wish to structure these along similar lines to those in place for avian licences.

Licence returns to be submitted biannually or annually as determined by CALM with a requirement on the transferrer to notify CALM on the first working day immediately after any transaction.

## **ORIGIN OF ANIMALS KEPT**

Animals may be sourced through local trade between keepers of legally acquired or captive bred stock and Regulation 4, 15 and 17 collection from the wild. CALM may require a nominal fee to be charged to recipient for recording additional individuals/species on existing licence.

Pet shops should be limited initially to trading in peripheral husbandry paraphernalia and not supplying reptiles and frogs directly.

For the purposes of equity, we request that CALM consider for licensing all Australian species able to be legally obtained. We appreciate that initially this will need to be determined by CALM on a case by case basis, eg new residents will require the ability to transfer legal collections from interstate.

## **HOUSING AND SECURITY**

The issue of licences to be conditional on enclosures being suitable, clean and secure. Extra enclosure security will be a required with the keeping of potentially dangerous species. We suggest a levy on new licences to reduce the cost of prior inspections by department personnel. WASAH would like to contribute to the guidelines regarding enclosure requirements.

## **EVIDENCE OF CAPTIVE BREEDING**

Apart from some venomous snakes and skinks, the majority of reptiles that would be kept are oviparous. Confirmation of breeding in captivity of licensed species can be shown if keeper notifies CALM when eggs are deposited allowing random inspection of incubating eggs by wildlife officer. The successful hatching will be evident by the keeper producing eggshells and offspring at the time of notification requesting endorsement on licence of additional individuals.

Viviparous species will pose a slightly more difficult problem. However, as it would be unlikely in most species for a keeper to locate simultaneously in the wild multiple samples of neonates, in most cases successful captive breeding will be evident by the production of sibling neonates and postnatal sloughs at the time of notification.

## **NON-COMPLIANCE OFFENCES**

The burden on CALM's resources will be reduced considerably if lesser *non-compliance* offences are treated with standardised penalties. These could be considered by CALM similarly as is in place for holders of avian licences.

## **PREY-SPECIES**

The primary consideration here is that CALM will only issue licences to keep species in this category under exceptional circumstances. Therefore a standard procedure could be to endorse each individual licence to keep herp-eating species with approval to take predetermined prey species.

## **BENEFITS OF IMPLEMENTING THESE CHANGES**

- a) The increased opportunity for developing experience will result in a greater number of people available for Reg. 4 licences to remove potentially dangerous snakes considered pests. This results in good public relations. Many of the reptiles removed from developed areas are ideal for keepers.
- b) The people who come in contact with a keeper will have their attitude enhanced positively concerning conservation. Chance observations of captive reptiles have led to further study by biologists. Members of WASAH are encouraged to publish their observations.
- c) Data collected on captive reproduction, even in the most common species, adds to the data bank and can assist any program on captive breeding of rare or endangered species initiated later.

d) Captive reptiles can be made available for biologists to examine, photograph or tissue sample.

e) Some studies require captive maintenance and breeding. Enlisting the assistance of amateurs for this is cost-efficient, particularly to institutions such as CALM, WA Museum and University of WA. Large numbers of offspring require labour-intensive care. Offspring under study can be distributed amongst keepers to reduce the burden on limited resources.

f) Western Australia is very large with a low human population density. The contributions on WA's herpetofauna expected by keepers will considerably broaden our knowledge of this faunal group.

## **WASAH's INVOLVEMENT PRE/POST A NEW LICENSING SYSTEM**

*Although WASAH has the best interest of its members to consider, we also envisage the involvement of non-members in keeping as well.*

1. All other states and territories have provision for their respective residents to pursue an interest in this field from the most basic level, ie. to keep, maintain and observe some of the more common and captive-adaptable reptiles, through to more specialised research-based keeping.
2. WASAH has produced care sheets to allow those wishing to maintain reptiles to do so in optimum conditions. Although not mandatory, WASAH would encourage member-keepers to make notes on

all aspects of their keeping. To complement this notekeeping WASAH has produced standardised forms to record data. The society's newsletter will allow keepers to publish their husbandry notes and observations locally.

3. Reptiles and frogs, unless exempt, will be only taken under licence. It is expected that a reduction in the numbers of wild-caught animals will result over time as keepers' develop successful breeding techniques and make captive-bred progeny available (with discretion) to other keepers. WASAH encourages members to allow researchers access to their reptiles as long as this does not result in stress or injury to these reptiles.
4. The advanced level licence to be restricted, generally, to members over 18 years old however exceptions may arise. At the basic level (first tiered licence) we expect restrictions on keeping locally exotic (not naturally occurring in the region) species.
5. Easy access to Reg. 15 licences will allow members to remove roadkilled specimens, photograph individuals and collect reptiles of significance for major scientific institutions. Reptiles collected under this licence may under certain circumstances be transferred to keeper's licence until death when it is passed onto institution.
6. Members will be encouraged to assist scientific institutions if requested. Programs where members can be of significant assistance are those in the field of captive breeding - our resources and expertise economically available while at the same time enlarging captive stock available to other members.

*Additional Note 14 December 1998*

## **IDENTIFICATION OF INDIVIDUAL REPTILES/FROGS**

There may need to be a range of methods developed allowing identification of *special species* (eg rare, threatened, vulnerable, unusual, etc). These methods may need be species- or size-specific.

DNA fingerprinting has been suggested as a suitable universal technique however it is an expensive procedure at present, although improved laboratory recording techniques may result in a reduction in cost in the future. In the interim, and while only a few individual animals of *special species* status are being kept, it may be prudent to establish a tissue-bank for possible future use if required. Types of tissue stored may need to be Order-specific, ie portion of slough in reptiles and skin secretions in frogs.

Other simpler and more economical techniques to be considered are:

- photographic record - suitable in patterned species of reptiles and frogs,
- belly-scale clipping - suitable in snakes and legless lizards,
- belly-scale scanning - suitable in snakes and legless lizards and
- microchip implants - suitable for all the larger individuals.