

Responses to the issues raised during consultation

There is broad support for the need to establish a better policy direction for the management of non-indigenous birds in Victoria. Submitters shared a common view that the current policy gap regarding the management of non-indigenous birds is not acceptable given the threat that non-indigenous birds pose to the environment.

Overview of key feedback themes

Theme	Context	Notes by project team
Overview of the policy	<p>Submitters asked for further evidence to demonstrate the risk associated with the establishment of non-indigenous birds in the wild as a result of escape or deliberate release from captivity.</p> <p>Submitters had reservations about the effectiveness of the proposed approach i.e. it will not lead to significantly less likelihood of new bird species establishing in the wild.</p>	<p>Published scientific literature indicates that escaped caged birds can and do pose a real threat to native species. DEPI applies a nationally consistent framework for assessing the risk posed to environmental, economic and social values by non-indigenous birds. The risk assessment is based on the danger posed by an animal, the likelihood of establishment and the consequences of establishment.</p> <p>The proposed policy will:</p> <ul style="list-style-type: none"> • limit the importation of new species of extreme or serious threat not currently known to be within Australia • help to prevent new species of non-indigenous birds from establishing in the wild in Victoria • enable DEPI to actively manage new incursions in the wild of species that pose a high threat of establishment • foster a partnership between Government and bird keepers to manage non-indigenous birds.
<p>Scope:</p> <ul style="list-style-type: none"> • Consider all non-indigenous birds • Focus on prevention (preventing new species from establishing in the wild) • Manage the risks associated with non-indigenous birds 	<p>There were concerns that the proposed approach does not make any advances on the 'status quo' in terms of ensuring the prevention and effective management of non-indigenous birds in Victoria into the future.</p> <p>Submitters suggest that further evidence is needed to support the claim that non-indigenous birds currently kept in private</p>	<p>The proposed policy is a tool to effectively manage non-indigenous birds in Victoria. The proposed policy will:</p> <ul style="list-style-type: none"> • limit the importation of new species of extreme or serious threat not currently known to be within Australia • help to prevented new species of non-indigenous birds from establishing in the wild in Victoria • enable DEPI to actively manage new incursions in the wild of species that pose a high threat of establishment • foster a partnership between Government and bird keepers to manage non-indigenous birds <p>Published scientific literature indicates that escaped caged birds can and do pose</p>

	<p>collections in Victoria pose a real threat.</p> <p>There were concerns about a new policy restricting the procurement and keeping of non-indigenous birds in captivity into the future.</p>	<p>a real threat to native species. DEPI applies a nationally consistent framework for assessing the risk posed to environmental, economic and social values by non-indigenous birds. The risk assessment is based on the danger posed by an animal, the likelihood of establishment and the consequences of establishment.</p> <p>Restrictions are limited to new species of significant concern to Victoria that are not known to be in Australia and a limited number of species that are already restricted to zoological institutions in Victoria.</p>
<p>Actions intended to manage the risks associated with non-indigenous birds</p>	<p>A recommendation was that the risk assessment process should be completed on a species by species basis.</p> <p>There were concerns about the prevention of high risk species from entering the state if this means the prevention of purchase and keeping of these species in captivity.</p> <p>Stakeholders require further clarification in relation to roles and responsibilities, appropriate methods and DEPI support for community-led action.</p> <p>It was suggested that, for the implementation of the policy, DEPI should consider the inclusion of educational and awareness raising activities to inform the community of their:</p> <ul style="list-style-type: none"> • Regulatory obligations for control • Voluntary options for control • Regulations associated with voluntary options for control (e.g. animal welfare). 	<p>The risk assessment process is based on a species by species process. DEPI follows the 'Guidelines for the Import, Movement and Keeping of Non-indigenous Vertebrates in Australia'. A National Document. Referred to as 'the guidelines'.</p> <p>In practice only a small number of extreme or serious threat species will be banned from entering the State.</p> <p>The new policy will clearly outline DEPI's role in Non-indigenous bird management in Victoria. DEPI can provide advice on best practice methods to manage non-indigenous species.</p> <p>DEPI can provide information on regulatory obligations, regulatory and statutory resources, such as the <i>Prevention of Cruelty to Animals Act 1986</i>, and methods to manage non-indigenous species.</p>
<p>Raising awareness of risks posed by species and promoting responsible ownership</p>	<p>There is a perception of heavy reliance on awareness raising and promoting responsible ownership for the management of non-indigenous birds that are currently kept in Victoria, regardless of their level of risk.</p>	<p>The Department believes that raising awareness and promoting responsible ownership is an important mechanism for management. Working with stakeholders in the future to report new species at large will be a key focus of the Department. Such approaches have worked well elsewhere.</p>
<p>No imposition of</p>	<p>Concern that the proposed approach will</p>	<p>Restrictions are limited to new species of</p>

significant regulatory burden on the current keeping of nonindigenous birds	allow continued importation, breeding and keeping of known high-risk non-indigenous bird species, and therefore the approach will not be effective in managing the risk posed by these species.	significant concern to Victoria that are not known to be in Australia and a limited number of species that are already restricted to approved zoological facilities in Victoria.
Component 1: Certain non-indigenous bird species of significant concern to Victoria that are not in Australia should not be brought into, kept or sold in Victoria	<p>Submitters seek clarification on which species would fall under this component.</p> <p>Bird species of significant concern must be identified on a species by species basis</p> <p>Current threat ratings for non-indigenous birds must be revised to ensure that they are based on the most current information.</p> <p>Create a 'permitted list' as an effective way to communicate which species are, or are not, permitted in Victoria. The 'permitted list' could also include details of the conditions under which those species may be kept.</p>	<p>DEPI will identify the species that fall under Component 1 and will consult with stakeholders on proposals to declare species under the legislation in accordance with the requirements of the Subordinate legislation act.</p> <p>See comment above.</p> <p>The threat ratings are based on the newly revised guidelines. The guidelines provide a nationally consistent framework for assessing risk.</p> <p>The Department will identify the species that fall under Component 1 and under Component 2. The guidelines provide details on keeping species from all threat categories.</p>
Component 2: Certain non-indigenous bird species that are known to be in Australia and have high pest potential and/or complex husbandry should be limited to zoological institutions	<p>Concern that this may require the removal of some species held in private collections currently, which could also create an incentive for their release.</p> <p>Submitters seek clarification on how 'high pest potential' will be determined and which species fall under this component.</p> <p>Submitters seek further discussion on the implications on current keeping, if high pest potential non-indigenous birds exist in private collections in Victoria.</p>	<p>No species currently held in aviculture will require removal. In practice this component relates to a small number of extreme or serious threat species that have been endorsed by the Vertebrate Pests Committee (VPC) that are already restricted to zoological institutions in Victoria, and/or species that have complex husbandry (not held by aviculturists).</p> <p>The policy will clearly define the threat levels. These are consistent with the guidelines. DEPI will consult with stakeholders on proposals to declare species under the legislation in accordance with the requirements of the Subordinate legislation act.</p> <p>The guidelines provide guidance on keeping species from all threat categories. DEPI is planning further engagement with stakeholders on this topic.</p>
Component 3: Non-indigenous bird species that are known to be in Victoria in private collections should NOT be subject to a permit system or other types	Submitters are concerned that the objectives of the proposed approach cannot be achieved without regulation.	DEPI does not consider it reasonable to increase the regulatory burden for bird keepers in Victoria. Permits to keep species in private collections would not be required.

of increase in regulatory burden		
Component 3a: For those species determined to pose a high threat of establishment in the wild in Victoria, the feral or wild populations of those species should be managed by DEPI as appropriate	<p>Submitters seek clarification on the definition of 'high threat of establishment in the wild', and which species would actually be declared under Component 3a.</p> <p>Submitters suggested that development of the policy should include specific systems or protocols, resources and expertise required to fill this role. This includes ensuring humane methods are used to manage these populations.</p> <p>There is interest amongst stakeholders to work in partnership with DEPI to develop a process for notification of non-indigenous bird sightings.</p>	<p>The policy will clearly define the threat levels. Declarations will only be for feral or wild populations of these species. The declaration will not impact on birds in captivity.</p> <p>DEPI recognises the need to have more effective resources and systems in place to manage bird species that pose a high threat of establishment in the wild. The Department endeavours to develop and execute a comprehensive policy.</p> <p>DEPI encourages the development of a process for notification of non-indigenous bird sightings.</p>
Component 3b: Those species determined not to pose a high threat of establishment in the wild in Victoria should be exempt from invasive species legislation in Victoria	<p>Submitters had concerns that the approach relies very heavily on the risk assessment process.</p> <p>Submitters seek further information on how DEPI would support community-led action for management of low-risk species.</p> <p>Submitters seek further clarification on how changes in risk will be monitored over time in the face of factors like climate change. For example, how will DEPI respond if low-risk species become highly invasive.</p> <p>There is a preference that any species that escape from captivity and are not in the wild should be treated as potentially invasive.</p> <p>Submitters feel that because of the uncertainty created by climate change, increased mobility, globalisation and urban encroachment, a more conservative approach is warranted.</p>	<p>Noted.</p> <p>DEPI can provide advice on best practice methods to manage non-indigenous species.</p> <p>DEPI encourages research on the risk assessment process and monitors the Vertebrate Pests Committee's Australian List of Threat Categories of Non-indigenous Vertebrates. The risk assessment model is a conservative model, which allows for variation in factors such as climate change.</p> <p>Only species that pose a sufficiently high threat of establishment in the wild in Victoria will be declared under legislation.</p> <p>Noted.</p>
Component 4: Non-indigenous quail, pheasants, and partridges should continue to be managed as Game species in Victoria	Submitters stated that the exclusion of game species appears to be inconsistent with the scope of the policy and a risk-based approach. These species should be subject to a risk assessment in the same way as other non-indigenous birds before they are declared as Game species under <i>the Wildlife (Game) Regulations 2012</i> .	DEPI does not consider it reasonable to change the current management of non-indigenous game species, however, DEPI will continue to provide advice on how to appropriately manage non-indigenous bird species under the <i>Wildlife (Game) Regulations 2013</i> . Game species are also risk assessed and assigned to a threat

	<p>Suggestion to improve the approach is to outline the processes and approaches that would be adopted if any of these game species became invasive and required active management because of their harmful impacts to the environment and other native species.</p>	<p>category by the Vertebrate Pests Committee.</p> <p>See above comment.</p>
<p>Component 5: Non-indigenous bird species that are widely established in Victoria should be exempt from legislation in Victoria</p>	<p>Submitters were concerned that this component may impede the ability to manage widely established non-indigenous birds. Control of widespread species may be warranted in some case e.g. to prevent spread across state borders or where species are still extending their range.</p> <p>Submitters seek clarification on DEPI's role in supporting individuals and community groups who are attempting to control established non-indigenous birds.</p> <p>Submitters seek clarification on how changes in risk will be monitored over time in the face of factors like climate change.</p> <p>Submitters feel that the community as a whole (including DEPI) should undertake control measures to reduce the environmental and economic impact of widely established nonindigenous birds if there is an ecological benefit of doing so. This could include control and eradication of isolated populations to prevent spread across borders or where species are still extending their range.</p> <p>Submitters support the inclusion of information sharing/education activities to promote appropriate ways to manage non-indigenous birds to the community.</p> <p>Submitters noted DEPI has an essential role to play in supporting individuals and community groups who are attempting to control feral birds to ensure that their efforts are humane, effective and have no impact on non-target species.</p> <p>Recommendation that populations of nonindigenous birds are reviewed within suitable timeframes (e.g. 10 years). These</p>	<p>DEPI does not consider it reasonable to impose the lawful responsibility of obliged control of widely established bird species upon all landowners when it is highly unlikely to result in overall population management. DEPI encourages community-led action.</p> <p>DEPI encourages community-led action through the provision of information.</p> <p>DEPI encourages research on issues such as climate change and invasive species management.</p> <p>DEPI can provide information on methods to manage local populations of non-indigenous species. In accordance with the Invasive Plants and Animals Policy framework each risk is assessed to determine the most appropriate intervention to maximise public benefit. This includes the ability to eradicate isolated infestations.</p> <p>DEPI can provide information on methods to manage local populations of non-indigenous species.</p> <p>The Department can support and encourage community-led action through the provision of information. DEPI is working with animal control organisations to develop more humane pest control solutions. Noted.</p>

	reviews should inform any revisions of legislative status and the role of DEPI in their management.	
Coordination with other policy and legislation	Submitters want to ensure that the final policy and the implementation of that policy is consistent and coordinated with policy and legislation at the national level and in other jurisdictions.	DEPI has considered approaches to the management of non-indigenous birds by the Australian Government and other jurisdictions. DEPI is working together with the Australian Government and other jurisdictions in harmonising approaches to invasive species management and legislative requirements.
Flexibility of the proposed approach	<p>Submitters had concerns as to whether the proposed approach offers enough flexibility to respond to possible future changes (political, biophysical, social, economic).</p> <p>Submitters suggest that flexibility of the proposed approach and implementation of the new policy should be maintained through effective partnerships with key stakeholders.</p>	<p>Noted.</p> <p>Agreed.</p>
Impact of the proposed approach on stakeholder organisations/sectors	<p>Submitters thought that the proposed approach might increase the incidence of cruelty to animals if community-led action is not carefully defined, monitored and controlled.</p> <p>The avicultural community noted that the impacts of the proposed approach as it currently stands are limited. However, the impacts will not be fully realised until the outcomes of the risk-assessments are known.</p>	<p>Noted.</p> <p>Noted.</p>
General	<p>Submitters require clarification on terminology (e.g. 'species of significant concern', 'high pest potential', 'high threat of establishment' and 'high risk') and how they will be determined.</p> <p>Submitters want to ensure that the risk-assessment process demonstrates best practice.</p> <p>The current proposal does not clarify the specific risk assessment process that will be used, and particularly whether it will include input from stakeholders.</p> <p>Some concern that the proposed</p>	<p>The new policy will clearly define the terminology used. Terminology will be consistent with that of the guidelines. This includes the risk-assessment process, which is considered best practice.</p> <p>See comment above.</p> <p>The risk assessment process is the process used in the guidelines. This process is considered best practice. DEPI recognises the importance of consultation and will consult with stakeholders on proposals to declare species under the legislation in accordance with the requirements of the <i>Subordinate Legislation Act 1994</i>.</p> <p>The proposed policy will:</p>

	<p>approach would not reduce risk sufficiently to meet their conservation objectives.</p> <p>Proposed approach favours the objectives of bird keepers over those of conservation.</p> <p>Submitters note the risk of metropolitan non-indigenous bird species continuing to expand their range further into regional and rural Victoria at the expense of native species if established non-indigenous bird species are not effectively controlled into the future.</p> <p>Submitters require further discussion on the implications on current keeping, if high pest potential non-indigenous birds exist in private collections in Victoria.</p> <p>A suggested inclusion of an additional species which is known to be established in the wild, the Rock Dove.</p> <p>Submitters were concerned that the proposed approach will limit the range of species available for display and captive breeding in zoological institutions in the future, if these species are not currently in the state of Victoria or Australia.</p>	<ul style="list-style-type: none"> • limit the importation of new species of extreme or serious threat not currently known to be within Australia • help to prevent new species of non-indigenous birds from establishing in the wild in Victoria • enable DEPI to actively manage new incursions in the wild of species that pose a high threat of establishment • foster a partnership between Government and bird keepers to manage non-indigenous birds. <p>The proposed policy is consistent with the Invasive Plants and Animals Policy Framework.</p> <p>The policy supports early intervention to minimise this risk.</p> <p>The guidelines is the key document that influences this policy.</p> <p>The lists generated as a result of this policy, i.e. species proposed to be declared under the <i>Catchment and Land Protection Act 1994</i> do not include the rock dove as this species is known to be established in the wild in Victoria. However, the species is on the Vertebrate Pests Committee's Australian List of Threat Categories of Non-indigenous Vertebrates.</p> <p>In practice this would only apply to a handful of extreme or serious threat species.</p>
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