**Application for approval of a Wildlife Trade Operation for the export of preserved taxidermy specimens of Australian Wildlife.**

**1.0 Background and Proposal**

South Pacific Taxidermy has been involved in the taxidermy industry since 1980 and operates a commercial facility in Melbourne, Victoria.

The prime activity of the company has been in the preparation of sport hunted game trophies for private collectors, and the mounting of specimens for private collectors and educational facilities throughout Australia.

In recent years there have been a growing number of requests to us from international persons for mounted preserved specimens of native Australian wildlife.

These requests have come from both private collectors and institutions/museums.

These requests may be attributed to a number of factors, the prime ones being:

* Our international exposure via the internet; and
* The reduction of taxidermy services previously provided by Australian museums to international institutions.

The applicant, South Pacific Taxidermy Pty Ltd, is seeking approval as a Wildlife Trade Operation for the export of preserved taxidermy specimens of native Australian Wildlife, other than those listed on Appendix I of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), or as threatened under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act); to private collectors, museums and educational institutions.

The applicant is a Commercial Wildlife Taxidermist licence holder in accordance with the *Victorian Wildlife Act 1975*.

**1.1 Species Proposed**

For the purpose of this application, the proposal shall include all species of:

- native Australian wildlife other than those species listed on Appendix I of CITES or as threatened under the EPBC Act, and

- non native exotic species that are listed on Appendix II and III of CITES, that:

* have been lawfully obtained as deceased specimens from captive held stocks

OR

* have been lawfully obtained from the wild as a result of human interaction.

**1.2 Location of Harvest/Source of Specimens**

Captive specimens for use in this operation will be sourced from stocks of wildlife that have died of natural causes in both private and institutional collections. Most specimens will be from collections held within Australia but in some cases the specimens may be sourced from collections held overseas. (For further information see Section 3.1.)

The location of harvest/collection of wild specimens is not limited to a particular state or territory but must be taken in accordance with State or Territory legislation. (For further information see Section 3.2.)

**1.3 Description of Harvest/Collection**

Specimens collected for taxidermy purposes will be stored either as frozen stock or in some instances as already mounted specimens. The primary materials to be used from specimens shall be the skin, and in some cases, the skeletal matter.

Skins used in taxidermy mounts are pickled in an acid solution with a pH less than 4.

Export specimens are required to comply with the requirements of the Australian Quarantine and Inspection Service (AQIS).

All harvest collections will comply with the relevant State or Territory legislation governing the take, possession, and preparation of native wildlife specimens.

Under state law, all native specimens of wildlife must be recorded into the official record book issued by the Department of Sustainability and Environment-Victoria for auditing purposes.

Due to the opportunistic nature of specimens received, age and sex of specimens is mixed.

**1.4 Legislative Protection**

Legislation governing the possession and trade of Australian wildlife in captivity exists within all States and Territories of Australia.

In most States and Territories there is a requirement by law that live native specimens of wildlife be held in accordance with an appropriate licence or permit, although in some states, some nominated species held in captivity do not require licensing.

In the state of Tasmania, the endangered Golden Shouldered and Hooded Parrots do not require private licensing, whilst in the state of Victoria, species such as the Western Rosella and Rainbow Lorikeet are also exempt.

It is a requirement of regulation that any person performing processing or taxidermy on any protected wildlife in the State of Victoria be licensed in accordance with the Wildlife Act 1975. This includes the parts of, as well as complete specimens.

This is covered under Section 52 of the Victorian Wildlife Regulations 2013.

The applicant holds a Commercial Wildlife (Wildlife Taxidermist) Licence issued by the Victorian Department of Environment and Primary Industries(DEPI).

Under Section 50 of the Wildlife Act 1975, a person must not import into Victoria from another State or Territory of the Commonwealth, any protected wildlife without a permit or authority from the Secretary (or delegate) of the DEPI.

The keeping of native wildlife by zoos, wildlife parks and private keepers is regulated under State and Territory legislation. The use of deceased specimens obtained from these lawful captive stocks poses no threat to wild populations of the same species, nor does it prejudice the conservation of other living species within Australia.

The use of specimens received as a result of take from the wild for damage mitigation or during an open season will be done so in accordance with existing State or Territory legislation governing the take, possession, and import of protected wildlife into Victoria. (For further information see Subsection 5.0). These requirements are generally governed by the Game Acts and Wildlife Acts in respective States and Territories.

Specimens received as road kills will be taken in accordance with the respective State or Territory wildlife laws and the collection of these specimens will not have any effect on the conservation of the species.

**2.0 Aims and Objectives of the Operation**

The aim of this operation is to utilise existing stocks and newly acquired stock of deceased native specimens of fauna that have been lawfully obtained from both captive and wild populations, for the purpose of taxidermy.

The objective of this operation is to service the requirements of private, institutional and museum collections overseas with these taxidermy specimens.

1. **Harvest/Collection Details**

Harvest collection can be categorised into two sub groups, each dealt with below.

The first group would be best categorized as “Captive Stock” (Section 3.1), whilst the second group would be best categorized as “Wild Stock” (Section 3.2).

Sources of “Captive Stock” are best divided into the following categories:

* Private Wildlife Keepers (see subsection 3.1.1)
* Fauna Parks (see subsection 3.1.2)

Sources of “Wild Stock” are best divided into the following categories:

* Road Kill Specimens (see subsection 3.2.1)
* Wildlife Management Programs (see subsection 3.2.2)
* Game Bird Hunting (see subsection 3.2.3)

Specimens can also be sourced through Commercial Wildlife Dealers, who utilise both “Captive Stock” and “Wild Stock” when providing specimens. As a result, Wildlife Dealers are being treated as a third category (Section 3.3)

**3.1 Captive Stock**

For the purpose of this application, captive stock shall be those captive specimens held in accordance with a legal permit or authority that have died in captivity.

All Australian States and Territories have legislation governing the possession and trade of native wildlife in captivity.

A “no license required” provision exists in some states for some species commonly held in captivity (see Section 1.4 for examples).

Dead specimens are acquired opportunistically when dead specimens are listed as available from a keeper at the institution. Due to the opportunistic nature of acquiring these specimens the number of species and the number of individuals received are unpredictable.

**3.1.1 Private Wildlife Keepers**

Private sources can be from local and interstate locations, and while the species received are diverse, the majority of specimens are parrots.

Collection is normally through established networks of keepers, or through the placement of advertisements in specialised publications.

Transfer or importation of native wildlife from a private person requires a registration of that transaction to be logged in wildlife record books held by this company. (For further information on record books held by this company, see Section 5).

Quantities received are opportunistic as death in captivity is unpredictable.

**3.1.2 Fauna Parks**

Acquisition of specimens is opportunistic and in general marsupials are more commonly held at larger facilities such as zoos and wildlife parks. These facilities are found Australia wide and often work closely with State/Territory and Federal wildlife agencies in captive breeding programs of Australian species. These facilities are licensed under the relevant state or territorial authority and are required to keep a registry of specimens held and/or disposed of.

**3.2 Wild Stock**

Specimens sourced from the wild are obtained as a result of human interaction.

**3.2.1 Deaths through human interaction**

Deaths caused by motor vehicle collisions, tree felling, electrical wires and collisions with man-made structures, are random accidental deaths of native wildlife due to human activities . Specimens are obtained opportunistically, though species can be specific within a defined region or habitat range where motor vehicles and human structures are maintained through that range.

Strict policies exist in all States and Territories concerning the retrieval, possession and ownership of road-kill specimens,

Quantities are received opportunistically.

**3.2.2 Wildlife Management Programs**

Within most States and Territories, legislation exists for the removal of native wildlife for damage mitigation under authorised controlled management programs. Such programs normally include the larger kangaroo and wallaby species, as well as some problem species such as brush tailed possum and common wombat.

Harvest is done in accordance with that state’s legislation and in accordance with conditions set out in the permit, including those conditions relating to animal welfare.

Age and sex of specimens collected in these harvest areas are often determined by the issuing authority of the relevant control licence or permit.

**3.2.3 Game Bird Hunting**

Game bird hunting for waterfowl and quail is a legislated activity conducted in a number of States and Territories which include Victoria, Tasmania, South Australia and the Northern Territory.

Under the Victorian Animal Welfare Act, a code of conduct for the hunting of native game birds with a shotgun is approved. This Code of Practice for the Welfare of Animals in Hunting (Revision Number 1) was issued by a notice published in the Government Gazette on 17 March 2005 under Section 7 of the Prevention of Cruelty to Animals Act 1986.

State and Territory governments manage game hunting sustainably by monitoring game harvest levels and ensuring they do not exceed the annual rate of reproduction. None of the waterfowl or quail species hunted are listed as threatened under the EPBC Act. Game bird hunting is strictly monitored and regulated with hunters required to obtain a licence and permit and ensure they adhere to all conditions.

Conditions include restrictions on the areas where hunting can occur, the species that can be targeted (hunters are required to pass a waterfowl identification test) and restrictions on daily bag limits for the number of birds that can be harvested by any one individual. Firearm licences for game bird hunting specify that only a shotgun of no greater gauge than 12 and steel shot must be used to harvest game waterfowl.

States and Territories declare an open season when waterfowl and quail can be hunted. In general the open season for hunting game birds is timed to occur when the population is at its maximum and to avoid periods of vulnerability. The close season is timed to prevent hunting during breeding, moulting, temperature extremes, low populations levels and food shortage.

In some years, game bird hunting seasons have remained closed for that year due to a variety of reasons, such as extensive drought and/or survey results showing low population numbers.

Appendix 1.0 provides an example of how the Victorian Department of Environment and Primary Industries manages game hunting.

**3.3 Commercial Wildlife Dealers**

In addition to purchasing specimens from the original holder of the specimen (eg. wildlife park, breeder, hunter/trapper etc), South Pacific Taxidermy also purchases specimens from commercial operators. These commercial wildlife dealers are authorized by the state or territorial authority to trade in native wildlife.

Primarily, Commercial Dealers such as Bird Dealers and Pet shops purchase live surplus birds from captive breeders.

To a small degree live birds are also purchased from approved wildlife trappers from throughout Australia

Specimens obtained from these commercial sources are specimens that have died naturally as a result of stress, trauma, disease or old age.

Wildlife species taken from the wild are generally restricted to the Sulphur crested Cockatoo, Long-billed Corella and Galah.

Specimens are acquired opportunistically and consequently the species type, sex and age will vary.

Most live commercial wildlife dealer operations are required by law to maintain a register or record book of wildlife transactions, although this requirement does vary and is subject to State and Territory regulations.

In some instances already preserved specimens become available through Auction houses and antique and second hand dealers

Each state has its own requirement regarding the possession and trade of already mounted and preserved specimens.

Because of the commercial nature of these transactions, most State and Territorial agencies require some form of licensing or notification of disposal, or in the case of transfer between borders compliance to the import and export requirements of protected wildlife

Transfer or importation of native wildlife from these commercial sources requires registration of that transfer to be noted in wildlife record books held by this company. (For further information see Section 5.1).

**4. 0 Impact of Harvest on the Taxa and the Environment**

The use of deceased specimens obtained from captive sources poses no threat upon the environment or the taxa of species involved.

The use of specimens received as a result of incidents and accidents such as road kills, is for all intents and purposes an indirect harvest of wildlife as those species have died from unintentional human activity. There is no direct impact on the environment caused by the activity of salvaging these specimens.

The use of specimens received as a result of Wildlife Management Programs (as outlined in Section 3.2.2) undertaken by States and Territories has no direct impact on the taxa or environment. State and Territory governments have management strategies to assist in determining when they would issue damage mitigation permits or when they would undertake control measures of wildlife.

The harvesting of game species (waterfowl and quail) is conducted with the objective that the harvest is done in a sustainable manner to ensure a healthy population of game species into the future at all times. Harvests are regulated by the relevant State or Territory agency and is managed to ensure that the harvest is sustainable and does not negatively impact on the conservation of the species or its environment.

(For further information on management of the harvest see Section 3.2.3 and Appendix 1).

**5. 0 Management Strategies and Compliance**

As a holder of a Wildlife Taxidermists Licence in Victoria, our activities are regulated by the DEPI in accordance with the Wildlife Act 1975, and associated Wildlife Regulations 2002.

A Wildlife Taxidermists Licence authorises the licence holder to possess, keep, buy, sell, dispose of, process for the purpose of preserving, preparing and mounting; and restoring parts or complete specimens, of those species of dead wildlife that are listed in Schedules 2, 3, 4 of the Wildlife Regulations 2013, and with the prior written approval of the Secretary, other species of wildlife which are not listed in those Schedules.

It is a requirement of the regulations that all specimens received either as gifts or for preparation be entered into the official record book as issued by DEPI Victoria. This information includes the name and address of supplier and where relevant, the details of the licence holder must be sighted and entered. Where a species is not required to be licensed by the owner, details in the form of personal id of the supplier are required to be recorded into the record book. Export permit details and import permit details are also required to be noted into the record book for auditing purposes.

The holder of a Taxidermist licence can also obtain dead specimens of wildlife obtained from the holder of a Wildlife Controller Licence.

A wildlife controller licence authorises the holder to take any wildlife listed in Schedule 6 of the 2013 regulations, and those species specified in the licence from the wild, and to destroy, dispose of, or sell the wildlife.

The applicant also holds a Private Wildlife Licence (Specimen Category). This licence allows the trade of already mounted and preserved specimens of wildlife.

**5. 1 Reports and Record Keeping**

It is a condition within Victoria that the holder of a wildlife licence must maintain complete, accurate, legible and up-to-date entries in a record book of wildlife received or disposed of in the course of their activities. The holder of a wildlife licence must produce the record book for inspection when requested to do so by an authorised officer.

Annual returns of wildlife stock traded must be submitted to DEPI within 14 days of close of period ending on the 31st March each year.

Section 50 of the Victorian Wildlife Act 1975 requires licensed persons to make prior written application to DEPI when importing or exporting any species of Wildlife into Victoria. Notification of the acquisition or disposal of wildlife in this manner, or that acquired or disposed of locally, must be in writing to the Director DEPI within 14 days of the transaction taking place.

**6.0 Background Information**

South Pacific Taxidermy has been involved in the taxidermy industry for over 30 years. During that time i have observed within the Asia Pacific region a growing desire and need for the construction and development of museum projects which serve to educate communities of their responsibilities to manage the environment, not only for the purpose of ensuring the survival of local eco systems, but those that could be effected by their actions many hundreds, if not thousands of kilometres away.

I have also observed an increase in the number of private wildlife keepers and fauna parks handling more diverse species of Australian wildlife.

Much of this can largely be attributed to the improved husbandry techniques and advanced knowledge employed by modern keepers. As a result of these husbandry improvements, some species that were difficult to maintain some 10 or 15 years ago now breed freely in captivity.

The variety of privately held native species has also increased enormously over the past 20 years and many considered rare or threatened in the wild, are common place in private hands.

South Pacific Taxidermy has been collecting deceased stock for almost 30 years and already has a stock of deceased native species suitable for taxidermy purposes. With this founding stock and continued access to deceased specimens from captivity and from lawful take from the wild, there exists both the capacity and means to supply suitable stocks for international requests with a minimal impact on wild stocks.

**References**

**Victorian Wildlife Act 1975**

<http://www.legislation.vic.gov.au/Domino/Web_Notes/LDMS/PubLawToday.nsf/2184e627479f8392ca256da50082bf3e/049853E04AE2338DCA2573FB001309C9/$FILE/75-8699a080.pdf>

**Victorian Wildlife Regulations 2002**

<http://www.legislation.vic.gov.au/Domino/Web_Notes/LDMS/PubStatbook.nsf/93eb987ebadd283dca256e92000e4069/1AEFC65EB79531B7CA256E5B0021AB38/$FILE/02-050sr.pdf>

**Appendix 1**

**Management of game hunting undertaken by the Department of Sustainability and the Environment, Victoria.**

**Source**

[DSE Home](http://www.dse.vic.gov.au/dse/index.htm) > [Recreation and Tourism](http://www.dse.vic.gov.au/dse/nrenrt.nsf/) > [Game Hunting](http://www.dse.vic.gov.au/DSE/nrenrt.nsf/childdocs/-7380F92E35E27D99CA2573750023D375?open) > [Licences and regulations](http://www.dse.vic.gov.au/DSE/nrenrt.nsf/childdocs/-7380F92E35E27D99CA2573750023D375-AAD7094D0D899B4BCA25737500243269?open)

**Link**

http://www.dse.vic.gov.au/DSE/nrenrt.nsf/LinkView/38AE28AEBFBDA6AACA2573760010445BAAD7094D0D899B4BCA25737500243269

To remain sustainable, game harvest levels must not exceed the annual rate of production. There are a number of mechanisms that can be used to regulate harvest levels, including season length, bag limits, number of hunters and the times and places where hunting can occur. In Victoria, the most commonly applied harvest regulators are season length and bag limits, but in certain instances, tighter controls (eg. balloted hunting) are used to achieve particular management objectives.   
  
Open and close seasons are one of the most common management tools used by wildlife agencies throughout the world to ensure the conservation of game resources and reduce hunting disturbance to both game and other wildlife during important stages of their life cycle. Open seasons are timed so as not to impact on productivity or core breeding stocks. The length of an open season is also used as a mechanism to regulate harvest, as harvest levels are known to show a positive relationship with increasing time.   
  
The primary consideration when setting open season dates is the probable impact that hunting will have on the species at a particular given time. Although the need to provide hunting opportunity is important, it must come second to minimising any likely detrimental impact on the status of the population and must be consistent with the biology of the species.  
  
For game populations, harvesting is generally timed to coincide with the post-breeding period when the population is temporarily increased by replacement and recruitment and the activities of hunters are less likely to damage breeding stocks. Close seasons allow game to breed undisturbed prior to hunting, maximising production and reducing the risk of any long-term effects of harvesting on the total population. Local elimination of small breeding populations of game species is also less likely than with a twelve-month season. The use of open and close seasons also means that enforcement efforts can be concentrated into particular periods.   
  
In addition to protecting game during periods of vulnerability, close seasons can also be a useful tool to ensure that hunting activity is conducted during periods consistent with other land management activities or peaks in other recreational pursuits. In most cases, these periods are not considered suitable for hunting anyway, due to high levels of disturbance which can disrupt hunting activities. To a large extent, hunting takes place during the colder months (autumn and early winter) when other recreational activities are reduced and the chance of conflict is less likely. In instances where there may be significant conflict or some threat to public safety, areas or periods may be closed to hunting.   
  
The length of the open season is used as a mechanism to regulate harvest levels, as levels are known to increase with longer seasons. If, for example, hunting is reducing a game animal population excessively, shortening of the open season could reduce the harvest to a sustainable level.  
  
Bag limits are used to restrict the number of animals taken on a daily or a seasonal basis and are used to ensure that harvesting does not compromise the long-term conservation status of the population. Bag limits can apply to a species generally or they can be more specific and set different limits for sex and/or age categories. The regulation of harvests using bag limits can also result in a more even distribution of game among hunters and can limit or prevent the accumulation of game species for illegal commercial sale.  
  
Bag limits have their greatest impact when set below levels that most hunters can achieve. If bag limits are excessively high, they have little effect on regulating the total harvest. High bag limits may also act as a goal that some hunters may strive to fulfil, placing unnecessary pressure on game populations and possibly leading to poor shooting practises. High bag limits that are rarely attained by the majority can also discourage goal-oriented hunters and can result in both the general and hunting communities believing that management is poor and that the population is not capable of sustaining such high levels of harvest.