

Department of Environment and Heritage
GENERAL BRIEFING NOTE

Approved Not Approved Noted
Further information required

Signed.....
Dated / /

TO: Executive Director – Nature Conservation
Services

SUBJECT: Policy for limiting numbers of dangerous snakes to be kept under a Recreational
Wildlife Licence and appropriate conditioning

RECOMMENDATION

It is recommended that the Executive Director – NCS

- **approve** the attached policy
- **sign** the policy document

BACKGROUND/KEY ISSUES

- There has historically been no limit on the amount of dangerous snakes that can be kept under a restricted Recreational Wildlife Licence in suburban areas.
- This has recently been raised as an issue by senior management within the Department.
- There is the potential for large numbers of dangerous snakes kept in suburban environments to become a risk to public safety.
- It is considered a reasonable public good initiative to limit the number of dangerous snakes that can be kept in a suburban environment.
- Whilst the keeping of dangerous snakes under a restricted Recreational Wildlife Licence is guided by a code of practice, there is not a requirement for the keeper to notify anyone entering the premises that there are dangerous snakes present.
- The code also fails to provide a requirement that keepers of dangerous snakes notify their local government for the purposes of disaster management planning.
- The attached policy provides for the delegate to limit the number of snakes that can be kept in suburban areas (defined in the policy) and recommends the delegate conditions the permit to ensure anyone entering the premises knows the dangerous snakes are there, and secondly, notifies the relevant local government in case the information is required for disaster management planning.

COMMENTS

ATTACHMENTS

Author Name: Sally Egan Position: Regional Manager - Southern Tel No: 07 4688 1258 Date: 14/03/2014 13474 File Ref:	Cleared by Name: Rebecca Williams Position: Director – Wildlife Management Tel No: 3330 5512	Recommended: Name: Geoff Clare Position: Executive Director Tel No: 3330 5390 Date:
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ARMBRUSTER Christine

From: NORTHAM Adam
Sent: Wednesday, 21 May 2014 2:15 PM
To: O'SULLIVAN Alison
Cc: EGAN Sally; WREGG Cameron
Subject: RE: Restricted for signing [REDACTED]
Attachments: DMView_1400641956861_06129-14_789200
_New_Operational_Policy_regarding_RW....doc

Hi Alison,

We need to re-issue this licence. A draft policy relating to restricted reptiles came into effect that I wasn't aware of. Can you please ensure that numbers of restricted (venomous) animals are limited 20 as [REDACTED]

[REDACTED]

Can you also ensure the new conditions are added to the permit.

I will work on the covering letter.

Cheers,

Adam Northam
Senior Ranger- South East
Wildlife Management Unit
Department of Environment and Heritage Protection
Tel: 07 55209620 | Mobile [REDACTED]
Visit us online at: www.ehp.qld.gov.au



From: O'Sullivan Alison
Sent: Friday, 14 March 2014 1:29 PM
To: NORTHAM Adam
Subject: Restricted for signing [REDACTED]

Hi Adam,

Please find attached [REDACTED] restricted permit for you to sign. This is the one I spoke to you about yesterday regarding the housing.

I have also attached assessment so you don't have to go through your old emails and have also put pics in again for you.



Cheers

Alison O'Sullivan

Wildlife Ranger

Department of Environment and Heritage Protection
Nature Conservation Services
Wildlife Management Unit
Southern Region

55 Priors Pocket Road Moggill
PO B ox 64
Bellbowrie Qld 4070

Ph: 3202 0375 (6) Personal information
Fax: 3202 6844

Email: alison.o'sullivan@ehp.qld.gov.au

www.ehp.qld.gov.au



RTI DL RELEASE - EHP

Operational policy

Wildlife management

Considerations when assessing Recreational Wildlife Licences for Restricted Reptiles – Dangerous Snakes

Operational policies provide a framework for consistent application and interpretation of legislation and for the management of non-legislative matters by the Department of Environment and Heritage Protection (EHP). Operational policies are not intended to be applied inflexibly in all circumstances. Individual circumstances may require a modified application of policy.

Policy subject

This policy outlines the considerations when assessing and approving Recreational Wildlife Licences that permit the keeping and recreational use of restricted reptiles, specifically dangerous snakes.

Purpose

This operational policy provides clarification on matters that the agency delegate needs to consider when approving the issue of a Recreational Wildlife Licence for restricted reptiles, which are listed in this operational policy as dangerous snakes. In particular, the number of dangerous snakes and the locations of large collections can expose the public to a significant risk if there is a failure of the licensee to follow security requirements as specified in the Code of Practice – Captive Reptile and Amphibian Husbandry.

Background

EHP staff are required to assess and approve Recreational Wildlife Licences for restricted reptiles that allow the licensee to keep dangerous snakes. Many existing licences are unlimited. It can be considered that the practice of allowing licensees to keep large numbers of dangerous snakes in closely settled suburban environments could constitute a public risk.

The Nature Conservation (Administration) Regulation 2006 states that in considering an application, the chief executive must have regard to public health and safety and the public interest. For this reason, it is deemed appropriate that limitations are placed on the number of dangerous reptiles (including snakes) that can be kept under a Recreational Wildlife Licence.

The Code of Practice – Captive Reptile and Amphibian Husbandry outlines the minimum security arrangements that must be in place if dangerous snakes are to be kept. The code fails to require notification of the presence of dangerous snakes to people who may enter the premises. This policy addresses that issue.

Definitions

Dangerous Snake: the following species of land snakes are capable of delivering a fatal bite or a bite that may cause severe symptoms in an adult human:

- death adders, *Acanthophis* spp.;

Considerations when assessing Recreational Wildlife Licences for Restricted Reptiles – Dangerous Snakes

- copperhead, *Austrelaps superba*
- De Vis' snake, *Denisonia devisi*;
- ornamental snake, *Denisonia maculata*; and
- whip snakes, *Demansia spp.*
- pale-headed snake, *Hoplocephalus bitorquatus*;
- Stephen's banded snake, *Hoplocephalus stephensi*;
- tiger snake, *Notechis scutatus*;
- eastern taipan, *Oxyuranus scutellatus*;
- western taipan, *Oxyuranus microlepidota*;
- red-bellied black snake, *Pseudechis porphyriacus*;
- blue-bellied or spotted black snake, *Pseudechis guttatus*;
- Collett's snake, *Pseudechis colletti*;
- mulga or king brown snake, *Pseudechis australis*;
- speckled brown snake, *Pseudonaja guttata*;
- Ingram's brown snake, *Pseudonaja ingrami*;
- eastern brown snake, *Pseudonaja textilis*;
- western brown snake, *Pseudonaja nuchalis*;
- small-eyed snake, *Rhinoplocephalus nigrescens*; and
- curl snake, *Suta suta*;
- rough-scaled snake, *Tropidechis carinatus*

Closely settled suburbia: means ordinary urban development with a block size of less than 1000m².

Delegate: means the person with the appropriate level of authority to approve and issue a Recreational Wildlife Licence – Restricted.

Euthanasia is to achieve humane destruction of an animal. The method must achieve instant insensibility followed by rapid death of the animal without it first regaining sensation or consciousness.

Restricted animal: means a protected animal mentioned in schedule 4, part 5.

Recreational Wildlife Licence – for restricted reptiles- a recreational wildlife licence with an additional endorsement for a restricted animal.

Policy statement

The delegate, when considering a Recreational Wildlife Licence for restricted reptiles (for the keeping of dangerous snakes) must:

1. Consider the location that the animals are to be kept.
2. If in closely settled suburbia, limit the licence to:
 - a. If a licence renewal, the number of animals currently kept by the applicant
 - b. If a new application from an interstate applicant who already keeps dangerous snakes, 20 individual animals.

Considerations when assessing Recreational Wildlife Licences for Restricted Reptiles – Dangerous Snakes

- c. If a new applicant with no dangerous snakes at the time of application, 20 individual animals.

Internal assessing procedures

Staff assessing Recreational Wildlife Licences for restricted reptiles for the keeping of dangerous snakes can require additional information regarding the numbers of animals currently held by an applicant.

Staff can assess the urban nature of proposed licenced premises through the use of Google maps.

Pre-licencing audit

Applications showing holding in excess of 20 dangerous snakes should be audited prior to the application being determined. This could include by physical audit or by submission of photographs, film etc.

Conditioning of Licences:

In addition to licence holders complying with the code, the following conditions must be applied to Recreation Wildlife Licences for restricted reptiles that list dangerous snakes -

1(a). The licensee must ensure that measures are in place to ensure that any person who seeks to enter the licensed premises is made aware prior to entering that dangerous snakes are being kept within the premises.

- An example for condition 1(a) is the posting of signage at the entry of the property or to the room where the animals are kept.

1(b). The measures taken by the licensee for the purposes of 1(a) must have effect regardless of whether the licensee is present at the premises that at the time

- An example for condition 1(b) is if a person other than the licensee who is residing at the licensing premises allows or permits another person to enter the premises when the licensee is not present at the premises.

2. The licensee must ensure that adequate security measures are in place to minimise the potential for unauthorised persons to enter that part of the licensed premises where the dangerous snakes are to be kept (the snake holding room).

- An example for condition 2. would be locked security screens fitted to all windows or other potential external entry points to the snake holding room, as well as locked doors at internal entry points.

3. For local government disaster management planning purposes, the licensee must provide notice in writing to the relevant local government in July of each calendar year that dangerous snakes are being kept at the licensed premises.

4. If dangerous snakes are allowed to breed, the number of animals including offspring, must not exceed the limit of animals imposed by the licence.

Disclaimer

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Considerations when assessing Recreational Wildlife Licences for Restricted Reptiles – Dangerous Snakes

Approved By

Signature

Date

Rod Goodbun
A/Executive Director,
Nature Conservation Services
Department of Environment and Heritage
Protection

Enquiries:
Nature Conservation Services
Ph. 3330 5512

RTI DL RELEASE - EHP

ARMBRUSTER Christine

From: Williams Rebecca
Sent: Friday, 7 March 2014 8:34 AM
To: EGAN Sally
Subject: FW: request for review of operational policy
Attachments: op-wl-draft-dangerous snakes_v2.doc

Sally
Some feedback, I haven't looked at it
Regards
Beck

From: Frisby Tony
Sent: Thursday, 6 March 2014 12:55 PM
To: Williams Rebecca
Subject: RE: request for review of operational policy

Only two changes that I can see
Thank you Beck
Regards,
Tony

Tony Frisby
Senior Ranger – Wildlife Management Operations
Department of Environment and Heritage protection

PO Box 5597
Townsville, QLD 4810
Phone: (07) 4796 7785
Fax: (07) 4796 7705
Email: tony.frisby@ehp.qld.gov.au



From: Williams Rebecca
Sent: Thursday, 6 March 2014 12:23 PM
To: JOYCE Mike; DEVERY Michael
Cc: Frisby Tony; EGAN Sally; SAVOCA Rosie; Sievers Wolf
Subject: request for review of operational policy

Mike(s)
Sally has drafted this operational policy. I seek your comment before we forward to Geoff for his endorsement.

Your comments by COB Wednesday 12 March 2014 would be appreciated.
Regards
Beck

RD Williams
Director Wildlife
Environment and Heritage Protection
Telephone 07 33305512



Operational policy

Wildlife management

Considerations when assessing Recreational Wildlife Licences for Restricted Reptiles – Dangerous Snakes

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Policy subject

This policy outlines the considerations when assessing and approving Recreational Wildlife Licences that permit the keeping and recreational use of restricted reptiles, specifically dangerous snakes.

Purpose

This operational policy provides clarification on matters that the agency delegate needs to consider when approving the issue of a Recreational Wildlife Licence for restricted reptiles, specifically dangerous snakes. In particular, the number of venomous snakes and the locations of large collections can expose the public to a significant risk if there is a failure of the licensee to follow security requirements as specified in the Code of Practice – Captive Reptile and Amphibian Husbandry.

Background

EHP staff are required to assess and approve Recreational Wildlife Licences that allow the licensee to keep dangerous snakes. Many existing licences are unlimited. It can be considered that the practice of allowing licences to keep large numbers of dangerous snakes in closely settled suburban environments could constitute a public risk.

The Nature Conservation (Administration) Regulation 2006 states that in considering an application, the chief executive must have regard to public health and safety and the public interest. For this reason, it is deemed appropriate that limitations are placed on the number of dangerous reptiles (including snakes) that can be kept under a Recreational Wildlife Licence.

The Code of Practice – Captive Reptile and Amphibian Husbandry outlines the security arrangements that must be in place if dangerous snakes are to be kept. The code fails to require notification of the presence of dangerous snakes to people who may have cause to enter the premises. This policy addresses that issue.

Definitions

Dangerous Snake:

The following species of land snakes found in Queensland are capable of delivering a fatal bite to an adult human:

Comment [FT1]: All front fanged snakes

Operational policy

Considerations when applying for a scheduled 4 drug authority

- death adders, *Acanthophsis* spp.;
- tiger snake, *Notechis scutatus*;
- eastern taipan, *Oxyuranus scutellatus*;
- western taipan, *Oxyuranus microlepidota*;
- red-bellied black snake, *Pseudechis porphyriacus*;
- blue-bellied or spotted black snake, *Pseudechis guttatus*;
- Collett's snake, *Pseudechis colletti*;
- mulga or king brown snake, *Pseudechis australis*;
- Ingram's brown snake, *Pseudonaja ingrami*;
- eastern brown snake, *Pseudonaja textilis*;
- western brown snake, *Pseudonaja nuchalis*;
- small-eyed snake, *Rhinoplocephalus nigrescens*; and
- rough-scaled snake, *Tropidechis carinatus*
- copperhead, *Austrelaps superba*

The following species are regarded as being capable of delivering bites that may cause severe symptoms. Bites from large specimens may require medical attention:

- speckled brown snake, *Pseudonaja guttata*;
- pale-headed snake, *Hoplocephalus biforquatus*;
- Stephen's banded snake, *Hoplocephalus stephensi*;
- curl snake, *Suta suta*;
- De Vis' snake, *Denisonia devisi*;
- ornamental snake, *Denisonia maculata*; and
- whip snakes, *Demansia* spp.

Closely settled suburbia: means ordinary urban development with a block size of less than 1000m².

Delegate: means the person with the appropriate level of authority to approve and issue a Recreational Wildlife Licence – Restricted.

Euthanasia is to achieve humane destruction of an animal. The method must achieve instant insensibility followed by rapid death of the animal without it first regaining sensation or consciousness.

Restricted animal: means a protected animal mentioned in schedule 3, part 5.

Recreational Wildlife Licence - Restricted- a recreational wildlife licence with an additional endorsement for a restricted or international animal.

Policy statement

The delegate, when considering a Recreational Wildlife Licence – Restricted reptiles (for the keeping of dangerous snakes) must:

1. Consider the location that the animals are to be kept.
2. If in closely settled suburbia, limit the licence to:

Comment [FT2]: This should read urban as defined by local council planning not by land size

Operational policy

Considerations when applying for a scheduled 4 drug authority

- a. If a licence renewal, the number of animals currently kept by the applicant
- b. If a new application from an interstate applicant who already keeps dangerous snakes, the number of animals currently kept by the applicant
- c. If a new applicant with no dangerous snakes at the time of application, 20 animals.

Internal assessing procedures

Staff assessing Recreational Wildlife Licences – Restricted for the keeping of dangerous snakes can require additional information regarding the numbers of animals currently held by an applicant.

Staff can assess the urban nature of proposed licenced premises through the use of Google maps.

Conditioning of Licences:

The following conditions must be applied to restricted Recreation Wildlife Licences for the keeping of dangerous snakes -

1(a). The licensee must ensure that measures are in place to ensure that any person who seeks to enter the licensed premises is made aware prior to entering that venomous snakes are being kept within the premises.

1(b). The measures taken by the licensee for the purposes of 1(a) must have effect regardless of whether the licensee is present at the premises at the time.

- An example for condition 1(b) is if a person other than the licensee who is residing at the licensing premises allows or permits another person to enter the premises when the licensee is not present at the premises.

2. The licensee must ensure that adequate security measures are in place to minimise the potential for unauthorised persons to enter that part of the licensed premises where the death adders or other venomous snakes are to be kept (the snake holding room).

- An example for condition 2, would be locked security screens fitted to all windows or other potential external entry points to the snake holding room, as well as a locked doors at internal entry points.

3. For local government disaster management planning purposes, the licensee must provide notice in writing to the relevant Shire Council in July of each calendar year that venomous snakes are being kept at the licensed premises.

4. If dangerous snakes are allowed to breed, the number of animals including offspring, must not exceed the limit of animals imposed by the licence.

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Operational policy

Considerations when applying for a scheduled 4 drug authority

Approved By

Signature

Date

Geoff Clare
Executive Director,
Nature Conservation Services
Department of Environment and Heritage
Protection

Enquiries:
Nature Conservation Services
Ph. 3330 5512

Draft
RTI DL RELEASE - EHP

Operational policy

Wildlife management

Considerations when assessing Recreational Wildlife Licences for Restricted Reptiles – Dangerous Snakes

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Considerations when assessing Recreational Wildlife Licences for Restricted Reptiles – Dangerous Snakes

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Euthanasia is to achieve humane destruction of an animal. The method must achieve instant insensibility followed by rapid death of the animal without it first regaining sensation or consciousness.

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Considerations when assessing Recreational Wildlife Licences for Restricted Reptiles – Dangerous Snakes

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- An example for condition 1(b) is if a person other than the licensee who is residing at the licensing premises allows or permits another person to enter the premises when the licensee is not present at the premises.

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Comment [ES1]: Beck...for your determination. I originally wrote this to say you can bring in what you have, but a couple of commenters have said, why not only allow them to bring in the 20 animals that a new applicant can have. Your call.

Comment [ES2]: We need to notify LGAQ that we are doing this

Considerations when assessing Recreational Wildlife Licences for Restricted Reptiles – Dangerous Snakes

Approved By

Signature

Date

Geoff Clare
Executive Director,
Nature Conservation Services
Department of Environment and Heritage
Protection

Enquiries:
Nature Conservation Services
Ph. 3330 5512

RTI DL RELEASE - EHP

ARMBRUSTER Christine

From: SAVOCA Rosie
Sent: Tuesday, 11 March 2014 1:08 PM
To: Williams Rebecca; JOYCE Mike; DEVERY Michael
Cc: Frisby Tony; EGAN Sally; Sievers Wolf
Subject: RE: request for review of operational policy
Attachments: op-wl-draft-dangerous snakes_v2 with comments.doc

Hi Beck

Attached are comments from Mike and I regarding the Ops policy.
Please don't hesitate to contact us if you would like to discuss anything.

Thanks

Rosie Savoca
Senior Conservation Officer
Threatened Species Unit - Compliance
Conservation, Strategy and Planning
Department of Environment and Heritage Protection
5th Floor, 400 George Street Brisbane QLD 4001
GPO Box 2454 Brisbane QLD 4001
Ph: 07 3330 5258
Fax: 07 3330 5398
Work Mobile: 07 3330 4444 (6) Personal information
Email: rosie.savoca@ehp.qld.gov.au



From: Williams Rebecca
Sent: Thursday, 6 March 2014 12:23 PM
To: JOYCE Mike; DEVERY Michael
Cc: Frisby Tony; EGAN Sally; SAVOCA Rosie; Sievers Wolf
Subject: request for review of operational policy

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Your comments by COB Wednesday 12 March 2014 would be appreciated.

Regards

Beck

RD Williams
Director Wildlife
Environment and Heritage Protection
Telephone 07 33305512



Operational policy

Wildlife management

Considerations when assessing Recreational Wildlife Licences for Restricted Reptiles – Dangerous Snakes

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Definitions

Dangerous Snake:

The following species of land snakes found in Queensland are capable of delivering a fatal bite or causing severe symptoms: to an adult human:

Comment [SR1]: Why is it only for QLD. Many dangerous animals currently held by RWL restricted licensees are endemic outside of QLD.

Operational policy

Considerations when applying for a scheduled 4 drug authority

- death adders, *Acanthophis* spp.;
- tiger snake, *Notechis scutatus*;
- eastern taipan, *Oxyuranus scutellatus*;
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Recreational Wildlife Licence - Restricted- a recreational wildlife licence with an additional endorsement for a restricted or international animal.

Policy statement

The delegate, when considering a Recreational Wildlife Licence – Restricted reptiles (for the keeping of dangerous snakes) must:

1. Consider the location that the animals are to be kept.

Comment [SR2]: List should be in genus to group animals easily. This also allows new species discovered in the genus to be captured in the future.

Comment [SR3]: Make one list of dangerous animals

Comment [SR4]: Schedule for restricted is schedule 4 part 5

Comment [SR5]: Obtaining restricted endorsement does not allow you to keep or use international animals. You need to obtain an international endorsement for this.

Comment [SR6]: This wording of licence name is not consistent across document.

Operational policy Considerations when applying for a scheduled 4 drug authority

2. If in closely settled suburbia, limit the licence to:
 - a. If a licence renewal, the number of animals currently kept by the applicant as indicated in the application form.
 - b. If a new application from an interstate applicant who already keeps dangerous snakes, the number of animals currently kept by the applicant as indicated in the application.
 - c. If a new applicant with no dangerous snakes at the time of application, 20 individual animals.

Comment [SR7]: Why can interstate ppl have more. Another option is to state they can only bring into QLD 20 dangerous animals, this includes any gravid females.

Internal assessing procedures

Staff assessing Recreational Wildlife Licences – Restricted for the keeping of dangerous snakes can require additional information regarding the numbers of animals currently held by an applicant.

Staff can assess the urban nature of proposed licenced premises through the use of Google maps.

Pre-licencing audit

Applications showing holding in excess of 20 dangerous snakes should be audited prior to the application being determined. This could include by physical audit or by submission of photographs, film etc.

Conditioning of Licences:

In addition to licence holders complying with the code, the following conditions must be applied to restricted Recreational Wildlife Licences for the keeping of dangerous snakes -

1(a). The licensee must ensure that measures are in place to ensure that any person who seeks to enter the licenced premises is made aware prior to entering that venomous dangerous snakes are being kept within the premises.

1(b). The measures taken by the licensee for the purposes of 1(a) must have effect regardless of whether the licensee is present at the premises at the time.

- An example for condition 1(b) is if a person other than the licensee who is residing at the licensing premises allows or permits another person to enter the premises when the licensee is not present at the premises.

2. The licensee must ensure that adequate security measures are in place to minimise the potential for unauthorised persons to enter that part of the licenced premises where the death adders or other venomous dangerous snakes are to be kept (the snake holding room).

- An example for condition 2 would be locked security screens fitted to all windows or other potential external entry points to the snake holding room, as well as a locked doors at internal entry points.

3. For local government disaster management planning purposes, the licensee must provide notice in writing to the relevant Shire Council in July of each calendar year that venomous dangerous snakes are being kept at the licenced premises.

4. If dangerous snakes are allowed to breed, the number of animals including offspring, must not exceed the limit of animals imposed by the licence.

Comment [SR8]: Should the department notify LGAQ and advise them we will be requesting this. This will allow LGAQ to comment if they do not want to obtain this information, or will allow them to be ready for the information.

Disclaimer

While this document has been prepared with care it contains general information and does not profess to offer legal, professional or commercial advice. The Queensland Government accepts no liability for any external decisions or actions

Operational policy

Considerations when applying for a scheduled 4 drug authority

taken on the basis of this document. Persons external to the Department of Environment and Heritage Protection should satisfy themselves independently and by consulting their own professional advisors before embarking on any proposed course of action.

Approved By

Signature

Date

Geoff Clare
Executive Director,
Nature Conservation Services
Department of Environment and Heritage
Protection

Enquiries:
Nature Conservation Services
Ph. 3330 5512

From: ehpcssncls.corro@ehp.qld.gov.au
Sent: Wednesday, 14 May 2014 1:40 PM
To: PRIOR Katrina
Subject: Correspondence Rejected:CTS No. 06129/14:Concerning: New Operational Policy regarding RWL for restricted reptiles

CTS No. 06129/14 has been reviewed and has been sent back for rework by Corro EHP CSS NCS with the following explanation: **Good afternoon Sally - please amend brief as per A/ED NCS comments/request inserted on brief and re-submit. Thank you. Sylvia.**

This item needs to be returned to EHP - CSS NCS on or before 22/04/14.

The request concerns: **New Operational Policy regarding RWL for restricted reptiles**

You should:

1. Undertake the necessary changes.
2. Resubmit for approval. (show me how)

Please click on the Item Link to view the item on MECS.

If you have any queries please contact Corro EHP CSS NCS or officers from EHP - CSS NCS by emailing to ehpcssncls.corro@ehp.qld.gov.au or via the link Management Team Link.

email: EmailRejectToApproveResponse

ARMBRUSTER Christine

From: WILLIAMS Rebecca
Sent: Friday, 23 May 2014 8:50 AM
To: EGAN Sally; PRIOR Katrina
Cc: EVANS Lucy; JOYCE Mike; WILLIAMS Allan; DEVERY Michael
Subject: FW: Item Finalised : CTS No.06129/14: Concerning New Operational Policy regarding RWL for restricted reptiles

I know we have had a bit of discussion about this but we need to have reference to the substance on the policy on the web before the end of next week. To facilitate this Sally could you summarise so it becomes text, I will nominate where it is to go and Lucy can you put in by Thursday please.

Mike and Allan FYI

Regards
Beck

RD Williams
Director Wildlife
Environment and Heritage Protection
Telephone 07 33305512



From: ehpcssnecs.corro@ehp.qld.gov.au [mailto:ehpcssnecs.corro@ehp.qld.gov.au]
Sent: Thursday, 22 May 2014 3:45 PM
To: WILLIAMS Rebecca
Subject: Item Finalised : CTS No.06129/14: Concerning New Operational Policy regarding RWL for restricted reptiles

CTS No. 06129/14 has been finalised. As you were involved in this item you may wish to review the comment history and view any final attachments.

Concerning: New Operational Policy regarding RWL for restricted reptiles

The following comments were added (if any): **A/ED approved and signed brief, letter to LGAQ and policy. Signed documents to Lucy Evans for appropriate action. Scanned copy of signed brief & attachments attached to workflow. Sylvia.**

Please click on the [Item Link](#) to view the item on MECS

As this email is automatically generated, please do not select reply.

If you have any queries please contact EHP - CSS NCS or officers from EHP - CSS NCS by emailing to ehpcssnecs.corro@ehp.qld.gov.au or via the link [Management Team Link](#).

CTS No. 06129/14

Department of Environment and Heritage
GENERAL BRIEFING NOTE

Approved	Not Approved	Noted
Further information required		
sch4-Signature		
Signature		
Date	22 " 05" 14.	

TO: A/Executive Director – Nature Conservation Services

SUBJECT: Policy for limiting numbers of dangerous snakes to be kept under a Recreational Wildlife Licence and appropriate conditioning

RECOMMENDATION

It is recommended that the A/Executive Director – NCS

- approve the attached policy
- sign the policy document
- sign the letter to the Local Government Association Queensland informing them of these changes.

BACKGROUND/KEY ISSUES

- There has historically been no limit on the amount of dangerous snakes that can be kept under a restricted Recreational Wildlife Licence in suburban areas.
- This has recently been raised as an issue by senior management within the Department.
- There is the potential for large numbers of dangerous snakes kept in suburban environments to become a risk to public safety.
- It is considered a reasonable public good initiative to limit the number of dangerous snakes that can be kept in a suburban environment.
- Whilst the keeping of dangerous snakes under a restricted Recreational Wildlife Licence is guided by a code of practice, there is not a requirement for the keeper to notify anyone entering the premises that there are dangerous snakes present.
- The code also fails to provide a requirement that keepers of dangerous snakes notify their local government for the purposes of disaster management planning.
- The attached policy provides for the delegate to limit the number of snakes that can be kept in suburban areas (defined in the policy) and recommends the delegate conditions the permit to ensure anyone entering the premises knows the dangerous snakes are there (eg through signage), and secondly, notifies the relevant local government in case the information is required for disaster management planning.

COMMENTS

ATTACHMENTS

Author Name: Sally Egan Position: Regional Manager - Southern Tel No: 07 4688 1258 Date: 14/03/2014	Cleared by Name: Rebecca Williams Position: Director – Wildlife Management Date: 21/05/14 Tel No: 3330 5512	Recommended: Name: Rod Goodbun Position: A/Executive Director Tel No: 3330 5390 Date:
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File Ref:

13-474

DL Documents

Page 1 of 1

26 of 63



Department of
Environment and
Heritage Protection

22 MAY 2014

Ref CTS 06129/14

Mr Greg Hallam PSM
Chief Executive Officer
LGAQ
PO Box 2230
FORTITUDE VALLEY QLD 4006

Dear Mr Hallam

I am writing to inform you that the Department of Environment and Heritage Protection is introducing a new policy designed to improve public safety with regard to dangerous snakes kept under a Recreational Wildlife Licence (RWL).

The *Operational policy: considerations when assessing Recreational Wildlife Licences for restricted reptiles – dangerous snakes* limits the number of dangerous snakes that can be kept under a new RWL in a suburban area to 20 animals. Additionally, the policy requires that RWLs are conditioned to ensure any person who seeks to enter the licenced premises is made aware of the presence of the dangerous snakes, and that for local government disaster management planning purposes, the licensee provides annual written notice to their local government advising that dangerous snakes are being kept at the licensed premises.

The requirement for RWL holders to keep their animals in accordance with the Code of Practice – Captive Reptile and Amphibian Husbandry remains unchanged. The Code is available on the department's website at: <http://www.ehp.qld.gov.au/licences-permits/plants-animals/recreational-use-animals/keeping_wildlife_for_recreational_purposes.html>.

Should your staff have any further enquiries, please contact Ms Rebecca Williams, Director Wildlife Management Unit of the department on telephone (07) 3330 5512.

Yours sincerely

sch4-Signature

Rdd Goodbun
A/Executive-Director
Nature Conservation Services

Enc. *Operational policy: considerations when assessing Recreational Wildlife Licences for restricted reptiles – dangerous snakes*

Level 5
400 George Street Brisbane
GPO Box 2454 Brisbane
Queensland 4001 Australia
Telephone + 61 7 3330 6390
Website www.ehp.qld.gov.au
ABN 46 640 294 485

Operational policy

Wildlife management

Considerations when assessing Recreational Wildlife Licences for Restricted Reptiles – Dangerous Snakes

Operational policies provide a framework for consistent application and interpretation of legislation and for the management of non-legislative matters by the Department of Environment and Heritage Protection (EHP). Operational policies are not intended to be applied inflexibly in all circumstances. Individual circumstances may require a modified application of policy.

Policy subject

This policy outlines the considerations when assessing and approving Recreational Wildlife Licences that permit the keeping and recreational use of restricted reptiles, specifically dangerous snakes.

Purpose

This operational policy provides clarification on matters that the agency delegate needs to consider when approving the issue of a Recreational Wildlife Licence for restricted reptiles, which are listed in this operational policy as dangerous snakes. In particular, the number of dangerous snakes and the locations of large collections can expose the public to a significant risk if there is a failure of the licensee to follow security requirements as specified in the Code of Practice – Captive Reptile and Amphibian Husbandry.

Background

EHP staff are required to assess and approve Recreational Wildlife Licences for restricted reptiles that allow the licensee to keep dangerous snakes. Many existing licences are unlimited. It can be considered that the practice of allowing licensees to keep large numbers of dangerous snakes in closely settled suburban environments could constitute a public risk.

The Nature Conservation (Administration) Regulation 2006 states that in considering an application, the chief executive must have regard to public health and safety and the public interest. For this reason, it is deemed appropriate that limitations are placed on the number of dangerous reptiles (including snakes) that can be kept under a Recreational Wildlife Licence.

The Code of Practice – Captive Reptile and Amphibian Husbandry outlines the minimum security arrangements that must be in place if dangerous snakes are to be kept. The code fails to require notification of the presence of dangerous snakes to people who may enter the premises. This policy addresses that issue.

Definitions

Dangerous Snake: the following species of land snakes are capable of delivering a fatal bite or a bite that may cause severe symptoms in an adult human:

– death adders, *Acanthophis* spp.;

Considerations when assessing Recreational Wildlife Licences for Restricted Reptiles – Dangerous Snakes

- copperhead, *Austrelaps superba*
- De Vis' snake, *Denisonia devisi*;
- ornamental snake, *Denisonia maculata*; and
- whip snakes, *Demansia* spp.
- pale-headed snake, *Hoplocephalus bitorquatus*;
- Stephen's banded snake, *Hoplocephalus stephensi*;
- tiger snake, *Notechis scutatus*;
- eastern taipan, *Oxyuranus scutellatus*;
- western taipan, *Oxyuranus microlepidota*;
- red-bellied black snake, *Pseudechis porphyriacus*;
- blue-bellied or spotted black snake, *Pseudechis guttatus*;
- Collett's snake, *Pseudechis colletti*;
- mulga or king brown snake, *Pseudechis australis*;
- speckled brown snake, *Pseudonaja guttata*;
- Ingram's brown snake, *Pseudonaja ingrami*;
- eastern brown snake, *Pseudonaja textilis*;
- western brown snake, *Pseudonaja nuchalis*;
- small-eyed snake, *Rhinoplocephalus nigrescens*, and
- curl snake, *Suta suta*;
- rough-scaled snake, *Tropidechis carinatus*

Closely settled suburbia: means ordinary urban development with a block size of less than 1000m².

Delegate: means the person with the appropriate level of authority to approve and issue a Recreational Wildlife Licence – Restricted.

Euthanasia is to achieve humane destruction of an animal. The method must achieve instant insensibility followed by rapid death of the animal without it first regaining sensation or consciousness.

Restricted animal: means a protected animal mentioned in schedule 4, part 5.

Recreational Wildlife Licence – for restricted reptiles- a recreational wildlife licence with an additional endorsement for a restricted animal.

Policy statement

The delegate, when considering a Recreational Wildlife Licence for restricted reptiles (for the keeping of dangerous snakes) must:

1. Consider the location that the animals are to be kept.
2. If in closely settled suburbia, limit the licence to:
 - a. If a licence renewal, the number of animals currently kept by the applicant
 - b. If a new application from an interstate applicant who already keeps dangerous snakes, 20 individual animals.

Considerations when assessing Recreational Wildlife Licences for Restricted Reptiles – Dangerous Snakes

- c. If a new applicant with no dangerous snakes at the time of application, 20 individual animals.

Internal assessing procedures

Staff assessing Recreational Wildlife Licences for restricted reptiles for the keeping of dangerous snakes can require additional information regarding the numbers of animals currently held by an applicant.

Staff can assess the urban nature of proposed licenced premises through the use of Google maps.

Pre-licencing audit

Applications showing holding in excess of 20 dangerous snakes should be audited prior to the application being determined. This could include by physical audit or by submission of photographs, film etc.

Conditioning of Licences:

In addition to licence holders complying with the code, the following conditions must be applied to Recreation Wildlife Licences for restricted reptiles that list dangerous snakes -

1(a). The licensee must ensure that measures are in place to ensure that any person who seeks to enter the licensed premises is made aware prior to entering that dangerous snakes are being kept within the premises.

- An example for condition 1(a) is the posting of signage at the entry of the property or to the room where the animals are kept.

1(b). The measures taken by the licensee for the purposes of 1(a) must have effect regardless of whether the licensee is present at the premises at the time.

- An example for condition 1(b) is if a person other than the licensee who is residing at the licensing premises allows or permits another person to enter the premises when the licensee is not present at the premises.

2. The licensee must ensure that adequate security measures are in place to minimise the potential for unauthorised persons to enter that part of the licensed premises where the dangerous snakes are to be kept (the snake holding room).

- An example for condition 2, would be locked security screens fitted to all windows or other potential external entry points to the snake holding room, as well as locked doors at internal entry points.

3. For local government disaster management planning purposes, the licensee must provide notice in writing to the relevant local government in July of each calendar year that dangerous snakes are being kept at the licensed premises.

4. If dangerous snakes are allowed to breed, the number of animals including offspring, must not exceed the limit of animals imposed by the licence.

Disclaimer

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Considerations when assessing Recreational Wildlife Licences for Restricted Reptiles – Dangerous Snakes

Approved By

sch4-Signature

Signature

22/05/14.

Date

Rod Goodbun
A/Executive Director,
Nature Conservation Services
Department of Environment and Heritage
Protection

Enquiries:
Nature Conservation Services
Ph. 3330 5512

RTI DL RELEASE - EHP

ARMBRUSTER Christine

From: PRIOR Katrina
Sent: Monday, 26 May 2014 3:05 PM
To: HOTCHKIS Debra
Cc: DEVERY Michael
Subject: FW: New policy for keeeping 'restricted' reptiles
Attachments: DMView_1401072081944_06129-14_814251
_AED_NCS_signed_brief_and_attachments.pdf

Hi Deb

Could you possibly hunt down a clean copy of this policy and provide to Mike?

Thanks

Kat

From: DEVERY Michael
Sent: Monday, 26 May 2014 2:29 PM
To: PRIOR Katrina
Subject: FW: New policy for keeeping 'restricted' reptiles

Hi Kat

Any chance of getting clean copy of the approved policy?

Cheers

mike

From: DEVERY Michael
Sent: Monday, 26 May 2014 12:48 PM
To: HOULT Liana
Cc: WILLIAMS Allan; SAVOCA Rosie; PRIOR Katrina
Subject: New policy for keeping 'restricted' reptiles

Hi Liana

FYI. As per the attached documentation, a new policy has been approved by the Acting Executive Director Nature Conservation Services in respect to the keeping of 'restricted' dangerous snakes under a Recreational Wildlife Licence. It is proposed that this document be available on the EHP website later this week

I expect that you may wish to make QCAT aware of this development so I'll arrange for a version to be available to you with the 'DRAFT' watermark removed.

Regards

mike

Michael Devery
Manager Compliance
Nature Conservation Services
Department of Environment and Heritage Protection
Work: 33305257
Mob: 0414 614 614 (6) Personal information



RTI DL RELEASE - EHP

ARMBRUSTER Christine

From: DEVERY Michael
Sent: Monday, 26 May 2014 2:29 PM
To: PRIOR Katrina
Subject: FW: New policy for keeeping 'restricted' reptiles
Attachments: DMView_1401072081944_06129-14_814251
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Any chance of getting clean copy of the approved policy?

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mike

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Hi Liana

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I expect that you may wish to make QCAT aware of this development so I'll arrange for a version to be available to you with the 'DRAFT' watermark removed.

Regards

mike

Michael Devery
Manager Compliance
Nature Conservation Services
Department of Environment and Heritage Protection
Work: 33305257
Mob: 0414 614 614 (6) Personal information



ARMBRUSTER Christine

From: PRIOR Katrina
Sent: Wednesday, 21 May 2014 8:39 PM
To: WILLIAMS Rebecca
Subject: Fwd: CTS No: 06129/14 for your information/input concerning: New Operational Policy regarding RWL for restricted reptiles

Hi Beck

Just checking if you mean actual EHP webpage or our Sharepoint site?

K.

Sent from my iPhone

Begin forwarded message:

From: <ehpcssnecs.corro@ehp.qld.gov.au>
Date: 21 May 2014 17:07:30 AEST
To: <Katrina.Prior@ehp.qld.gov.au>
Subject: CTS No: 06129/14 for your information/input concerning: New Operational Policy regarding RWL for restricted reptiles

CTS No 06129/14 concerning the above is currently assigned to **WILLIAMS Rebecca** for action. It has been decided that you need to be involved so you have been sent a link to this item for your information/input. Please see below for relevant comments.

Lucy as discussed can you update the weekly notice. Mike D and Allan W FYI re QCAT. Sally as discussed a few other jobs to come out of this for ecotrack and project unify, Mike J FYI ; Kat as discussed this information will need to go asap on our web page.

Please click on the Item Link to view the item on MECS.

If you have any queries please contact WILLIAMS Rebecca or officers from EHP - CSS NCS by emailing to ehpcssnecs.corro@ehp.qld.gov.au or via the link Management Team Link.

email: EmailInformationOfficerNotification

ARMBRUSTER Christine

From: Egan Sally
Sent: Thursday, 13 February 2014 5:00 PM
To: Williams Rebecca; Prior Katrina
Subject: op-wl-draft-dangerous snakes
Attachments: op-wl-draft-dangerous snakes.doc

Hello Beck and Kat,

First and rough cut. Defer to your policy expertise.

S.

RTI DL RELEASE - EHP

Operational policy

Wildlife management

Considerations when assessing Recreational Wildlife Licences for Restricted Reptiles – Dangerous Snakes

Operational policies provide a framework for consistent application and interpretation of legislation and for the management of non-legislative matters by the Department of Environment and Heritage Protection (EHP). Operational policies are not intended to be applied inflexibly in all circumstances. Individual circumstances may require a modified application of policy.

Policy subject

This policy outlines the considerations when assessing and approving Recreational Wildlife Licences that permit the keeping and recreational use of restricted reptiles, specifically dangerous snakes.

Purpose

This operational policy provides clarification on matters that the agency delegate needs to consider when approving the issue of a Recreational Wildlife Licence for restricted reptiles, specifically dangerous. In particular, the number of venomous snakes and the locations of large collections can expose the public to a significant risk if there is a failure of the licensee to follow security requirements as specified in the Code of Practice – Captive Reptile and Amphibian Husbandry.

Background

EHP staff are required to assess and approve Recreational Wildlife Licences that allow the licensee to keep dangerous snakes. Many existing licences are unlimited. It can be considered that the practice of allowing licensees to keep large numbers of dangerous snakes in closely settled suburban environments could constitute a public risk.

The Nature Conservation (Administration) Regulation 2006 states that in considering an application, The chief executive must have regard to public health and safety and the public interest. For this reason, it is deemed appropriate that limitations are placed on the number of dangerous snakes that can be kept under a Recreational Wildlife Licence.

The Code of Practice – Captive Reptile and Amphibian Husbandry clearly outlines the security arrangements that must be in place if dangerous snakes are to be kept. The code fails to require notification of the presence of dangerous snakes to people who may have cause to enter the premises. This policy addresses this issue.

Definitions

Dangerous Snake:

The following species of land snakes found in Queensland are capable of delivering a fatal bite to an adult human:



Considerations when applying for a scheduled 4 drug authority

- death adders, *Acanthophis* spp.;
- tiger snake, *Notechis scutatus*;
- eastern taipan, *Oxyuranus scutellatus*;
- western taipan, *Oxyuranus microlepidota*;
- red-bellied black snake, *Pseudechis porphyriacus*;
- blue-bellied or spotted black snake, *Pseudechis guttatus*;
- Collett's snake, *Pseudechis colletti*;
- mulga or king brown snake, *Pseudechis australis*;
- Ingram's brown snake, *Pseudonaja ingrami*;
- eastern brown snake, *Pseudonaja textilis*;
- western brown snake, *Pseudonaja nuchalis*;
- small-eyed snake, *Rhinoplocephalus nigrescens*; and
- rough-scaled snake, *Tropidechis carinatus*
- copperhead, *Austrelaps superba*

The following species are regarded as being capable of delivering bites that may cause severe symptoms. Bites from large specimens may require medical attention:

- speckled brown snake, *Pseudonaja guttata*;
- pale-headed snake, *Hoplocephalus bitorquatus*;
- Stephen's banded snake, *Hoplocephalus stephensi*;
- curl snake, *Suta suta*;
- De Vis' snake, *Denisonia devisi*;
- ornamental snake, *Denisonia maculata*; and
- whip snakes, *Demansia* spp.

Closely settled suburbia: means ordinary urban development with a block size of less than 1000m².

Delegate: means the person with the appropriate level of authority to approve and issue a Recreational Wildlife Licence – Restricted.

Euthanasia is to achieve humane destruction of an animal. The method must achieve instant insensibility followed by rapid death of the animal without it first regaining sensation or consciousness.

Restricted animal: means a protected animal mentioned in schedule 3, part 5.

Recreational Wildlife Licence - Restricted- a recreational wildlife licence with an additional endorsement for a restricted or international animal.

Policy statement

The delegate, when considering a Recreational Wildlife Licence – Restricted for the keeping of dangerous snakes must:

1. Consider the location that the animals are to be kept.
2. If in closely settled suburbia, limit the licence to:

Operational policy

Considerations when applying for a scheduled 4 drug authority

- a. If a licence renewal, the number of animals currently kept by the applicant
- b. If a new application from an interstate applicant who already keeps dangerous snakes, the number of animals currently kept by the applicant
- c. If a new applicant with no dangerous snakes at the time of application, 20 animals.

In issuing the licence for a restricted number of animals, the delegate must:

3. Ensure that the licence is conditioned such that all persons likely to enter the premises where dangerous snakes are kept are made aware of the animal's presence; and
4. Ensure that the licence is conditioned such that if the animals are allowed to breed, the total number of animals kept by the licensee cannot exceed the limitation of the licence.

Internal assessing procedures

Staff assessing Recreational Wildlife Licences – Restricted for the keeping of dangerous snakes can require additional information regarding the numbers of animals currently held by an applicant.

Staff can assess the urban nature of a proposed licenced premises through the use of Google maps.

Disclaimer

While this document has been prepared with care it contains general information and does not profess to offer legal, professional or commercial advice. The Queensland Government accepts no liability for any external decisions or actions taken on the basis of this document. Persons external to the Department of Environment and Heritage Protection should satisfy themselves independently and by consulting their own professional advisors before embarking on any proposed course of action.

Approved By

Signature

Date

Geoff Clare
Executive Director,
Nature Conservation Services
Department of Environment and Heritage
Protection

Enquiries:
Nature Conservation Services
Ph. 3330 5512

ARMBRUSTER Christine

From: Williams Rebecca
Sent: Thursday, 13 March 2014 4:10 PM
To: EGAN Sally; Prior Katrina
Cc: Evans Lucy
Subject: op-wl-draft-dangerous snakes_v3
Attachments: op-wl-draft-dangerous snakes_v3.doc

Follow Up Flag: Follow up
Flag Status: Completed

Kat: Can you have this put on MECS for me please.
Sally can you do a very brief brief on this for Geoff.

Kat when this is approved we will need to put on Steps and incorporate into our information on the web. This is just a place marker for work at this stage

Regards
Beck
RD Williams
Director Wildlife
Environment and Heritage Protection
Telephone 07 33305512



RTI DL RELEASE - EHP

Operational policy

Wildlife management

Considerations when assessing Recreational Wildlife Licences for Restricted Reptiles – Dangerous Snakes

Operational policies provide a framework for consistent application and interpretation of legislation and for the management of non-legislative matters by the Department of Environment and Heritage Protection (EHP). Operational policies are not intended to be applied inflexibly in all circumstances. Individual circumstances may require a modified application of policy.

Policy subject

This policy outlines the considerations when assessing and approving Recreational Wildlife Licences that permit the keeping and recreational use of restricted reptiles, specifically dangerous snakes.

Purpose

This operational policy provides clarification on matters that the agency delegate needs to consider when approving the issue of a Recreational Wildlife Licence for restricted reptiles, which are listed in this operational policy as dangerous snakes. In particular, the number of dangerous snakes and the locations of large collections can expose the public to a significant risk if there is a failure of the licensee to follow security requirements as specified in the Code of Practice – Captive Reptile and Amphibian Husbandry.

Background

EHP staff are required to assess and approve Recreational Wildlife Licences for restricted reptiles that allow the licensee to keep dangerous snakes. Many existing licences are unlimited. It can be considered that the practice of allowing licensees to keep large numbers of dangerous snakes in closely settled suburban environments could constitute a public risk.

The Nature Conservation (Administration) Regulation 2006 states that in considering an application, the chief executive must have regard to public health and safety and the public interest. For this reason, it is deemed appropriate that limitations are placed on the number of dangerous reptiles (including snakes) that can be kept under a Recreational Wildlife Licence.

The Code of Practice – Captive Reptile and Amphibian Husbandry outlines the minimum security arrangements that must be in place if dangerous snakes are to be kept. The code fails to require notification of the presence of dangerous snakes to people who may enter the premises. This policy addresses that issue.

Definitions

Dangerous Snake:

The following species of land snakes are capable of delivering a fatal bite or a bite that may cause severe symptoms in an adult human:

Considerations when assessing Recreational Wildlife Licences for Restricted Reptiles – Dangerous Snakes

- death adders, *Acanthophis* spp.;
- copperhead, *Austrelaps superba*
- De Vis' snake, *Denisonia devisi*;
- ornamental snake, *Denisonia maculata*; and
- whip snakes, *Demansia* spp.
- pale-headed snake, *Hoplocephalus bitorquatus*;
- Stephen's banded snake, *Hoplocephalus stephensi*;
- tiger snake, *Notechis scutatus*;
- eastern taipan, *Oxyuranus scutellatus*;
- western taipan, *Oxyuranus microlepidota*;
- red-bellied black snake, *Pseudechis porphyriacus*;
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Closely settled suburbia: means ordinary urban development with a block size of less than 1000m².

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Euthanasia is to achieve humane destruction of an animal. The method must achieve instant insensibility followed by rapid death of the animal without it first regaining sensation or consciousness.

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Considerations when assessing Recreational Wildlife Licences for Restricted Reptiles – Dangerous Snakes

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Conditioning of Licences:

In addition to licence holders complying with the code, the following conditions must be applied to Recreation Wildlife Licences for restricted reptiles that list dangerous snakes -

1(a). The licensee must ensure that measures are in place to ensure that any person who seeks to enter the licensed premises is made aware prior to entering that dangerous snakes are being kept within the premises.

1(b). The measures taken by the licensee for the purposes of 1(a) must have effect regardless of whether the licensee is present at the premises that at the time.

- An example for condition 1(b) is if a person other than the licensee who is residing at the licensing premises allows or permits another person to enter the premises when the licensee is not present at the premises.

2. The licensee must ensure that adequate security measures are in place to minimise the potential for unauthorised persons to enter that part of the licensed premises where the dangerous snakes are to be kept (the snake holding room).

- An example for condition 2. would be locked security screens fitted to all windows or other potential external entry points to the snake holding room, as well as a locked doors at internal entry points.

3. For local government disaster management planning purposes, the licensee must provide notice in writing to the relevant Shire Council in July of each calendar year that dangerous snakes are being kept at the licensed premises.

4. If dangerous snakes are allowed to breed, the number of animals including offspring, must not exceed the limit of animals imposed by the licence.

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Considerations when assessing Recreational Wildlife Licences for Restricted Reptiles – Dangerous Snakes

Approved By

Signature

Date

Geoff Clare
Executive Director,
Nature Conservation Services
Department of Environment and Heritage
Protection

Enquiries:
Nature Conservation Services
Ph. 3330 5512

RTI DL RELEASE - EHP

ARMBRUSTER Christine

From: WILLIAMS Rebecca
Sent: Friday, 14 March 2014 5:07 PM
To: Evans Lucy
Cc: EGAN Sally; Prior Katrina
Subject: RE: EDbrief_dangerous snakes

And the rest of that message is "please.

Thanks

Beck"

Regards

Beck

RD Williams

Director Wildlife

Environment and Heritage Protection

Telephone 07 33305512



From: WILLIAMS Rebecca
Sent: Friday, 14 March 2014 5:06 PM
To: Evans Lucy
Cc: Egan Sally (Sally.Egan@ehp.qld.gov.au); Prior Katrina (Katrina.Prior@ehp.qld.gov.au)
Subject: EDbrief_dangerous snakes

Lucy

Can you attach this version to the MECS item.

ARMBRUSTER Christine

From: Prior Katrina
Sent: Monday, 31 March 2014 9:40 AM
To: Armbruster Christine
Subject: RE: op-wl-draft-dangerous snakes_v3

No incoming, this will be instigated by us as a result of the new policy we are bringing in.

Cheers

Kat

From: Armbruster Christine
Sent: Monday, 31 March 2014 9:35 AM
To: Prior Katrina
Subject: RE: op-wl-draft-dangerous snakes_v3

Sorry Kat, did the incoming get lost in the replies?

Christine Armbruster

Administration Officer, Operational Support and Services | Wildlife Management
Nature Conservation Services
Department of Environment and Heritage Protection
Level 5 | 400 George Street | BRISBANE
Tel 07 3330 5820
www.ehp.qld.gov.au



From: Prior Katrina
Sent: Thursday, 27 March 2014 3:21 PM
To: Armbruster Christine
Subject: FW: op-wl-draft-dangerous snakes_v3

Hi Chrissie

A job for Friday if possible. Could you please have a go at drafting a letter to LGAQ? Should be relatively brief – intro, two paras maximum about what we are doing (see purpose and background), and one para about where they fit in (see comment on draft policy).

The MECS item is 06129/14 (draft policy is there also).

Cheers

Kat

From: Williams Rebecca
Sent: Thursday, 13 March 2014 4:11 PM
To: Prior Katrina
Cc: EGAN Sally
Subject: RE: op-wl-draft-dangerous snakes_v3

Kat

Sorry one more thing. Could you have a letter drafted from Geoff to LGAQ letting them know we are doing this and have put on the same MECS item.

Ta

Beck

RD Williams

Director Wildlife

Environment and Heritage Protection

Telephone 07 33305512



From: EGAN Sally

Sent: Thursday, 13 March 2014 4:01 PM

To: Williams Rebecca

Subject: op-wl-draft-dangerous snakes_v3

Hi Beck,

Latest draft with most comments incorporated. A few points for clarification in the doc.

S.

RTI DL RELEASE - EHP

ARMBRUSTER Christine

From: NORTHAM Adam
Sent: Wednesday, 21 May 2014 2:18 PM
To: GREEN Jo; TAYLOR Jamie; CAMERON Amber; WREGG Cameron; O'SULLIVAN Alison; LAZZARONI Helen
Cc: EGAN Sally
Subject: FW: DMView_1400641956861_06129-14_789200
_New_Operational_Policy_regarding_RWL_for_restricted_reptiles
Attachments: DMView_1400641956861_06129-14_789200
_New_Operational_Policy_regarding_RWL_for_restricted_reptiles.doc

Hi All,

Please see attached a new draft policy regarding restricted reptile endorsements on RWL's. The most notable changes relate to the number of dangerously venomous snakes able to be kept under an RWL and several new conditions.

Can you please apply this policy when assessing applications.

Cheers,

Adam Northam
Senior Ranger- South East
Wildlife Management Unit
Department of Environment and Heritage Protection
Tel: 07 55209620 | Mobile: 0414 614 614 (6) Personal information
Visit us online at: www.ehp.qld.gov.au



From: EGAN Sally
Sent: Wednesday, 21 May 2014 1:13 PM
To: NORTHAM Adam
Subject: DMView_1400641956861_06129-14_789200_New_Operational_Policy_regarding_RWL_for_restricted_reptiles

As requested Adam,

S.

Operational policy

Wildlife management

Considerations when assessing Recreational Wildlife Licences for Restricted Reptiles – Dangerous Snakes

Operational policies provide a framework for consistent application and interpretation of legislation and for the management of non-legislative matters by the Department of Environment and Heritage Protection (EHP). Operational policies are not intended to be applied inflexibly in all circumstances. Individual circumstances may require a modified application of policy.

Policy subject

This policy outlines the considerations when assessing and approving Recreational Wildlife Licences that permit the keeping and recreational use of restricted reptiles, specifically dangerous snakes.

Purpose

This operational policy provides clarification on matters that the agency delegate needs to consider when approving the issue of a Recreational Wildlife Licence for restricted reptiles, which are listed in this operational policy as dangerous snakes. In particular, the number of dangerous snakes and the locations of large collections can expose the public to a significant risk if there is a failure of the licensee to follow security requirements as specified in the Code of Practice – Captive Reptile and Amphibian Husbandry.

Background

EHP staff are required to assess and approve Recreational Wildlife Licences for restricted reptiles that allow the licensee to keep dangerous snakes. Many existing licences are unlimited. It can be considered that the practice of allowing licensees to keep large numbers of dangerous snakes in closely settled suburban environments could constitute a public risk.

The Nature Conservation (Administration) Regulation 2006 states that in considering an application, the chief executive must have regard to public health and safety and the public interest. For this reason, it is deemed appropriate that limitations are placed on the number of dangerous reptiles (including snakes) that can be kept under a Recreational Wildlife Licence.

The Code of Practice – Captive Reptile and Amphibian Husbandry outlines the minimum security arrangements that must be in place if dangerous snakes are to be kept. The code fails to require notification of the presence of dangerous snakes to people who may enter the premises. This policy addresses that issue.

Definitions

Dangerous Snake: the following species of land snakes are capable of delivering a fatal bite or a bite that may cause severe symptoms in an adult human:

- death adders, *Acanthophis* spp.;

Considerations when assessing Recreational Wildlife Licences for Restricted Reptiles – Dangerous Snakes

- copperhead, *Austrelaps superba*
- De Vis' snake, *Denisonia devisi*;
- ornamental snake, *Denisonia maculata*; and
- whip snakes, *Demansia spp.*
- pale-headed snake, *Hoplocephalus bitorquatus*;
- Stephen's banded snake, *Hoplocephalus stephensi*;
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 - b. If a new application from an interstate applicant who already keeps dangerous snakes, 20 individual animals.

Considerations when assessing Recreational Wildlife Licences for Restricted Reptiles – Dangerous Snakes

- c. If a new applicant with no dangerous snakes at the time of application, 20 individual animals.

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- An example for condition 1(a) is the posting of signage at the entry of the property or to the room where the animals are kept.

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- An example for condition 1(b) is if a person other than the licensee who is residing at the licensing premises allows or permits another person to enter the premises when the licensee is not present at the premises.

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- An example for condition 2. would be locked security screens fitted to all windows or other potential external entry points to the snake holding room, as well as locked doors at internal entry points.

3. For local government disaster management planning purposes, the licensee must provide notice in writing to the relevant local government in July of each calendar year that dangerous snakes are being kept at the licensed premises.

4. If dangerous snakes are allowed to breed, the number of animals including offspring, must not exceed the limit of animals imposed by the licence.

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Considerations when assessing Recreational Wildlife Licences for Restricted Reptiles – Dangerous Snakes

Approved By

Signature

Date

Rod Goodbun
A/Executive Director,
Nature Conservation Services
Department of Environment and Heritage
Protection

Enquiries:
Nature Conservation Services
Ph. 3330 5512

RTI DL RELEASE - EHP

ARMBRUSTER Christine

From: DEVERY Michael
Sent: Wednesday, 11 June 2014 12:51 PM
To: ARMBRUSTER Christine
Subject: FW: Limit on restricted reptiles held under an RWL - QCAT

Hi Chrissie
Below is relevant material.

Regards

mike

From: EGAN Sally
Sent: Wednesday, 21 May 2014 9:28 AM
To: DEVERY Michael
Cc: WILLIAMS Rebecca
Subject: RE: Limit on restricted reptiles held under an RWL - QCAT

Hi Mike,

Yes I agree with all your points. The draft policy is currently with the A/ED.

I will talk to Adam about the licensee and run the audit today.

Cheers

S

From: DEVERY Michael
Sent: Wednesday, 21 May 2014 8:08 AM
To: EGAN Sally
Cc: WILLIAMS Rebecca; WILLIAMS Allan; STEVERS Wolf; GOODBUN Rodney
Subject: FW: Limit on restricted reptiles held under an RWL - QCAT

Hi Sally

In preparation for the upcoming QCAT compulsory conference in Cairns, are you able to update me on where Wildlife Management is at with the issues and suggested responses I raised below. I'd like to ensure that both Allan Williams, the Litigation Unit and I are in a position to respond to any queries that might be brought up by Tribunal Member or appellant regarding the contemporary approach to licensing of restricted.

Regards

mike

Michael Devery
Manager Compliance
Nature Conservation Services
Department of Environment and Heritage Protection
Work: 33305257
Mobile: 08 4044 4444 (6) Personal information

From: DEVERY Michael
Sent: Friday, 16 May 2014 8:06 AM
To: EGAN Sally
Cc: WILLIAMS Allan; WILLIAMS Rebecca; SIEVERS Wolf; GOODBUN Rodney; SAVOCA Rosie
Subject: Limit on restricted reptiles held under an RWL - QCAT

Hi Sally

I refer to our Tuesday teleconference with NSW about a compliance/licensing matter during which it came to our attention that an RWL had recently been granted in respect to premises in a residential area without a limit on the number of restricted reptiles that may be kept under the licence. I understood from the discussion that this occur as a result of a misunderstanding within Wildlife Management about the interim licencing requirements to be applied while the revised policy is being formally approved.

I anticipate that the question of the current approach to licensing of restricted reptiles will be raised in the course of the QCAT directed pending compulsory conference that Allan Williams and I are attending in Cairns on 2 June. While I believe the internal email correspondence and associated documentation generated over the past few months in relation to this matter will provide a sound indication of the intention of the department to apply a limit to the number of restricted animals authorised to be kept from the time the matter came under consideration, I suggest the following further actions should be taken as soon as possible if not already underway:

1. The Acting Executive Director NCS consider and if satisfied with the content, approve the new operational policy regarding RWLs for restricted reptiles. This could be on an interim basis should the Acting Executive Director wish to have the policy reviewed on a future occasion.
2. The licensee identified in Tuesday's meeting be advised (pursuant to s46 of the Nature Conservation (Administration) Regulation 2006):
 - due to an administrative oversight, the interim position of the department on restricted reptile licensing while the new operational policy was under development was not applied to his licence in respect to the number of restricted reptiles he is permitted to keep, and
 - accordingly the authorising of unlimited restricted animals on his licence was an error and that his licence has been amended to reflect the total number of restricted reptiles he would permitted to keep under the department's interim licencing approach at the time of his application.
3. A state-wide audit be immediately conducted to confirm that no other RWLs have been granted authorising the keeping of unlimited numbers of restricted reptiles since the time of the revision of the department's licencing approach, and if this has occurred such licences be dealt with in the same manner as per 2. above.

I would be happy to assist with the preparation of any correspondence required in respect to 2 above.

I believe the above actions will suitably position Allan and I to respond to any queries in relation to recent relevant licensing decisions should they arise at the June compulsory conference.

As this is primarily a Wildlife Management matter, the Director Wildlife Management and Acting Executive Director may wish to consider whether advice of this development needs to be progressed further upwards with senior management.

regards

mike

Michael Devery
Manager Compliance

Nature Conservation Services
Department of Environment and Heritage Protection
Work: 33305257
Mod 4 (6) Personal information



RTI DL RELEASE - EHP

Operational policy

Wildlife management

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