



THE FINCH SOCIETY OF AUSTRALIA INC

(Incorporated under the *Associations Incorporation Act 2009*)

PO Box 26 Douglas Park NSW 2569

www.finchsociety.org secretary@finchsociety.org

21 November 2014

RE: BIOSECURITY REGULATION REVIEW: CAPTIVE BIRDS

Thankyou for the opportunity to comment prior to the finalisation of the regulations to accompany the Biosecurity Act 2014. We and other avicultural organisations were disappointed our input was not sought prior to the formulation of the Act - no doubt most of the current uncertainty would have been avoided.

Our Society specialises in finch and softbill species. Our focus is aviculture however we are also involved in various other activities such as conservation, avian related research, occupational therapy and other medical benefits for keepers of captive birds.

We make the following comments followed by 3 recommendations.

Registering designated animals

We make the following observations regarding finch and softbill species:

1. Under the previous Act the 100 bird threshold was never enforced. Indeed to our knowledge it was unknown to all aviculturists.
2. There is no evidence indicating captive finches and softbills pose a threat to biosecurity warranting registration. No other jurisdiction in Australia is considering such an imposition.
3. Larger finch and softbill aviculturists are already known to the state government through the licencing of native species.
4. There is an obvious and significant difference between 100 finches and 100 large macaws, chickens, ducks or geese. A single suburban aviary will routinely hold in the region of 100 finches after breeding season. Suggesting that such backyard aviaries require registration is impractical in terms of enforcement and in any case we are unable to identify a purpose.

Options for a property registration fee

With due regard to our observations above, we make the following comments regarding large poultry and other large bird captive populations. It is unreasonable to burden hobbyists with additional fees or charges. Furthermore a fee would simply discourage compliance and limit the extent of risk mitigation.

Feeding insects and worms to captive birds

The above heading and wording indicates birds are not fed other animal matter apart from insects and worms. This shows an ignorance regarding the diet of many avian species and the nature of current manufactured feeds. Again such misunderstanding would have been simpler to resolve prior to the Acts finalisation.

Popular "soft food" formulations include meat meal, fish meal and other animal based products. These products are distributed widely and used extensively to maintain and breed numerous species. They are an integral part of the diet of many species, particularly when breeding.



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We presume, based on advice from personnel in your office, that feeding live insects to captive bird species will remain legal under the new Act. It is critical to the survival of numerous species in aviculture that live insects must be fed. For many species they are required for survival and for others they are required for breeding.

Many finch and softbill aviculturists also freeze insects of various types for use during periods when the insect in live form is difficult to source or breed. In these cases it is usual to freeze the live insects whilst they are alive. When fed out the insects must be drip fed in small quantities at regular intervals to ensure freshness. We are unable to locate scientific literature indicating any biosecurity risk associated with these processes.

Regulation Recommendations

1. We have demonstrated that finch and softbill avicultural activities do not pose any biosecurity risk, therefore we recommend a blanket registration exemption for all smaller species including finches and softbills.
2. A blanket exemption to ensure manufactured "soft foods" that include animal matter can continue to be fed to captive birds.
3. A blanket exemption to ensure live and frozen insects and worms can continue to be fed to captive birds.

We look forward to your timely response.

Kind regards,

A handwritten signature in black ink, appearing to read 'Sam Davis', with a long horizontal flourish underneath.

Sam Davis
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