

WIRES Submission

Inquiry into Licences to Harm Native Animals

2025

About WIRES

WIRES is Australia's largest wildlife rescue organisation, and operates a dedicated Wildlife Rescue Office assisting wildlife and the community across Australia 24-hours a day, 365 days a year, providing rescue advice and assistance for over 200,000 calls annually. We have around 4,000 dedicated volunteers as well as a fleet of Wildlife Ambulances operated by full-time, professional Emergency Responders.

WIRES provides support for other organisations and individual carers Australia-wide, across major projects, food support, disaster relief funding, training, rescue communications systems, and the National Grants Program (NGP). WIRES NGP provides up to $1 million per year for wildlife rescue and rehabilitation projects across throughout Australia, commencing in 2021.

WIRES has developed partnerships and programs and provides forward-thinking national support to hundreds of projects which aim to see listed species' populations increase though protection efforts. Since the 2019-2020 summer bushfires, we have had an increasing focus on supporting projects that protect and restore threatened habitats, to support communities to live with wildlife, and provide for the long-term recovery of wildlife habitat and the preservation of native species in the wild.

In addition, WIRES trains hundreds of rescuers and carers annually, are dedicated to the ongoing recruitment of new volunteers and the continued training of existing volunteers. This growing network is critical for the rescue and rehabilitation of our unique native wildlife.

Cover image: John Paolini

Contents

Executive Summary 2
Reccomendations 3
Introduction & overview 4
The licensing program is not fit-for-purpose 7
An additional burden on the volunteer wildlife rescue and rehabilitation sector 8
Transparency and the public register of licences to harm 10
The lives of individual animals matter 12
Cultural consultation 13
Conclusion 14

Executive Summary

There is an increasing community expectation of government to act to protect our unique and precious wildlife. Not to make their killing permissible, with limited oversight or transparency. The assumptions underpinning the licensing to harm program are incompatible with societal expectations.

Public tolerance for the killing our unique and precious wildlife is waning, impacting public trust in government and Departmental approaches. As awareness increases of anthropogenic harm and the increasing impacts and threats imposed on wildlife, calls for change are increasing.

Australia's unique and precious wildlife are inherently and situationally vulnerable. The licensing program is an inexcusable response to impacts which are anthropogenic in cause, prioritising convenience over acceptable outcomes. These impacts are driven by avoidable human approaches to land use and management. The program must shift in focus to co-existence with wildlife, supporting landholders to live with wildlife.

The additional burdens the licensing program imposes on the volunteer wildlife rescue and rehabilitation sector are direct outcomes of a policy choice.

The licensing program must shift in focus to facilitate coexistence, to support landholders to live with wildlife in and across the landscape. The program must adapt to reflect public expectations of government to act to protect our unique and precious wildlife. For all our benefit.

Reccomendations

Recommendation 1

The Committee and the *Inquiry into Licences to Harm Native Animals* draw on the knowledge and experience of the volunteer wildlife rescue and rehabilitation sector.

Recommendation 2

The Committee and the *Inquiry into Licences to Harm Native Animals* acknowledge that the licencing program is not fit for purpose.

Recommendation 3

The Committee and the *Inquiry into Licences to Harm Native Animals* acknowledge that inexcusable harm is implicit and explicit in the licensing program.

Recommendation 4

The Committee and the *Inquiry into Licences to Harm Native Animals* acknowledge the lack of transparency and accountability around decision making of the licensing program.

Recommendation 5

The *Inquiry into Licences to Harm Native Animals* recommend that an independently verifiable and publicly accessible reporting web portal replace to 'public register of licences to harm' spreadsheet.

Recommendation 6

An accessible and regularly updated web portal must include all historical and current licenses to ensure transparency and accountability of all decision making of the licensing program.

Recommendation 7

An accessible and regularly updated web portal must include all historical and future records of the number of animals harmed, species, their fate, and (general) location to ensure transparency and accountability of the licensing program.

Recommendation 8

The *Inquiry into Licences to Harm Native Animals* recommend that funding, staff and other resources currently assigned to the licensing program be re-deployed to support landholders to co-exist with wildlife.

Recommendation 8a

If required, additional funding be provided to redeploy staff and other resources currently assigned to the licensing program to support landholders to co-exist with wildlife.

Introduction & overview

NSW Wildlife Information and Rescue Service Inc (WIRES) welcomes the opportunity to provide a submission to the *Inquiry into Licences to Harm Native Animals*. The licensing program, overseen by the National Parks and Wildlife Service (NPWS), is based on fundamental assumptions incompatible with societal expectations. The program causes harm to our unique and precious wildlife, with additional — at times unforeseen — impacts on the broader community, including the volunteer wildlife rescue and rehabilitation sector.

> *'It is urgent that we learn to facilitate coexistence with wildlife in shared multi-use landscapes, for the wellbeing of both wildlife and people.'*[1]

The licensing program is founded on, and enables, the killing and harming of wildlife. A key feature of the licensing process is making certain animals — as individuals and as members of a species — killable. To make violence towards these animals — euphemistically reframed as humane — permissible. Permissible for simple convenience. The licensing program sits counter to pubic expectations. Public tolerance for the killing our unique and precious wildlife is waning,[2] impacting public trust in government and Departmental approaches. Our unique and precious wildlife play a critical role in Australia's identity.[3]

Individual (and collectively) animals made killable are rendered invisible, and further invisibilised through a benignified reporting process. A reporting process which further obscures the impacts of the licensing program, the harm it causes, and an array of broader implications. All bound up in assumptions underpinning the permissibility of killing which the licensing program makes possible. The licensing program implicitly and explicitly creates the context, the situations, in which the killing of individual animals become positioned as inevitable and unproblematic. The

---

[1] Pooley, S.,Linnell, J.D.C., Münster, U., van Dooren, T., & Zimmermann, A. (2022). Understanding Coexistence With Wildlife [Editorial], *Frontiers in Conservation Science*, 3, 830971. https://www.doi.org/10.3389/fcosc.2022.830971

[2] Bekoff, M., (ed) (2013). *Ignoring nature no more: the case for compassionate conservation*. University of Chicago Press, Chicago. https://doi.org/10.7208/chicago/9780226925363.001.0001
Ramp, D., & Bekoff, M. (2015). Compassion as a practical and evolved ethic for conservation. *BioScience* 65(3), pp. 323–327. https://doi.org/10.1093/biosci/biu223

[3] Englefield, B., Blackman, S. A., Starling, M., & McGreevy, P. D. (2019). A Review of Australian Animal Welfare Legislation, Regulation, Codes of Practice, and Policy, and Their Influence on Stakeholders Caring for Wildlife and the Animals for Whom They Care. *Animals*, 9(6), 335. https://doi.org/10.3390/ani9060335

program positions, legitimates, their killing as unavoidable.[4] Routinely with limited or not transparency or oversight. The program does not reflect community expectations of the Department or government, and has broader negative societal implications on our understandings of nature, and our place as a part of the natural world.[5]

Australia's unique and precious wildlife are inherently and situationally vulnerable, with human impacts and influences creating significant threats.[6] The root causes of human-wildlife conflict the licensing program is currently designed to respond to are anthropogenic in nature, often driven by avoidable human approaches to land use and management.[7]

Land tenure is directly correlated with impacts on wildlife and biodiversity,[8] with the list of reasons included on the *Landholder's licence to harm native protected animals application* form being explicitly anthropocentric, positioning wildlife as an impediment to landholders rather than a living individual in their home, a valuable and valued part of the landscape, and whose protection is expected by the broader community. All of this by a department established to oversee environmental protection.

> *It is telling that the application form — and the general licences — do not provide any indication of consideration for the impacts of 'humane destruction,' including of pouch and other young.*

The permissibility of killing, and the assumptions behind them, are increasingly being seen by the broader public — supported by rigorous and engaged research — as inherently problematic.

---

[4] van Dooren, T. (2011) Invasive species in penguin worlds: An ethical taxonomy of killing for conservation. *Conservation & Society*, 9(4), pp. 286-298. https://www.jstor.org/stable/26393053

[5] Wallach, A.D., Bekoff, M., Nelson, M.P., & Ramp, D. (2015). Promoting predators and compassionate conservation. *Conservation Biology*, 29(5), pp. 1481-4. https://www.doi.org10.1111/cobi.12525.

[6] Faria, C. (2023). Vulnerability and the Ethics of Environmental Enhancement, *Ethics, Policy & Environment*, 26(2), pp. 179–197. https://doi.org/10.1080/21550085.2023.2200725

[7] van Dooren, T., Price, C.J., Banks, P.B., Oded Berger-Tal, O., Chrulew, C., Johnson, J., Lajeunesse G., E. Lynch, K.E., McArthur, C., Parker, F.C.G., Oakey, M., Pitcher, B.J., St. Clair, C.C., Ward-Fear, G., Sam Widin, S., Bob B.M. Wong, B.B.M., & Blumstein, D.T. (2023). The ethics of intervening in animal behaviour for conservation, Trends in Ecology and Evolution, 38(9), pp. 822-830. https://doi.org/10.1016/j.tree.2023.04.011

[8] Kearney, S.G., Carwardine, J., Reside, A.E., Adams, V.M., Nelson, R., Coggan, A., Spindler, R., & Watson, J.E.M. (2022). Saving species beyond the protected area fence: Threats must be managed across multiple land tenure types to secure Australia's endangered species. *Conservation Science and Practice* 4(3), e617. https://doi.org/10.1111/csp2.617

Individual animal's lives matter.[9] The killing wildlife, of individuals, leads untold others to be orphaned and displaced, directly causing further harm.

The harms currently permitted by the licensing program increase the burden on the volunteer wildlife rescue and rehabilitation sector — an invaluable service, provided at a significant avoided cost to government. The volunteer wildlife rescue and rehabilitation sector provides an important community service, an expected community service, recognising that the protection and care for our unique and precious wildlife is a priority of the people in NSW.[10] This community service is provided at an avoided cost to government. An annual cost estimated in the tens of millions of dollars.[11]

The additional burdens the licensing program imposes on the volunteer wildlife rescue and rehabilitation sector are the direct outcomes of a policy choice. These additional burdens are avoidable, and directly impact the social and emotional being of rescuers and carers.[12] An issue of significant concern to the viability and longevity of the volunteer wildlife rescue and rehabilitation sector, and impacts well-known to government through and across numerous reviews and inquiries.[13] Similar impacts are documented in other countries.[14]

---

[9] Steinhardt, M., Pratt, S., & Ramp, D. (2022). Re-Thinking Felid–Human Entanglements through the Lenses of Compassionate Conservation and Multispecies Studies, *Animals* 12, 2996. https://doi.org/10.3390/ani12212996

[10] Barratt, V. & Medvecky, F. (2022). Knowledge and attitudes towards Australian wildlife rescue services, Australian Zoologist, 42(3), pp. 702-718. https://doi.org/10.7882/AZ.2021.050

[11] Haering, R., Wilson, V., Zhuo, A., and Stathis, P. (2021). A survey of veterinary professionals about their interactions with free-living native animals and the volunteer wildlife rehabilitation sector in New South Wales, Australia, *Australian Zoologist* 41(2), 254-282. https://doi.org/10.7882/AZ.2020.045.
Englefield, B., Candy, S., Starling, M., & McGreevy, P. (2019). The Demography and Practice of Australians Caring for Native Wildlife and the Psychological, Physical and Financial Effects of Rescue, Rehabilitation and Release of Wildlife on the Welfare of Carers, *Animals* 9(12), 1127. https://doi.org/10.3390/ani9121127.
Haering, R., Wilson, V., Zhuo, A., & Stathis, P. (2020). Towards a more effective model of local wildlife care with the volunteer wildlife rehabilitation sector: A survey of volunteers in New South Wales, Australia. *Australian Zoologist* 40 (4): 605–627. https://doi.org/10.7882/AZ.2019.018.
Haering, R., Wilson, V., Zhuo, A., and Stathis, P. (2018). Towards a more effective model of local wildlife care with the volunteer wildlife rehabilitation sector: A survey of volunteers in New South Wales, Australia. *AWRC Proceedings*.

[12] Englefield, B., Blackman, S. A., Starling, M., & McGreevy, P. D. (2019). A Review of Australian Animal Welfare Legislation, Regulation, Codes of Practice, and Policy, and Their Influence on Stakeholders Caring for Wildlife and the Animals for Whom They Care. *Animals*, 9(6), 335. https://doi.org/10.3390/ani9060335

[13] Cushing, N., Meehan, C., & Norris, K. (2022). Resilience in animal care professions: does the stress shield model fit? *Australian Veterinary Journal* 100, pp. 513–525. https://doi.org/10.1111/avj.13193

[14] Sarmiento, S.M. (2024). *Unsung Heroes in Conservation: Evaluating the Limitations Faced by New England Wildlife Rehabilitation Centers and Proposing Solutions for their Support and Recognition*. Honors Theses and Capstones. 787. https://scholars.unh.edu/honors/787

The Committee and the *Inquiry into Licences to Harm Native Animals* is well placed to examine the implications of the current licensing program, and to recommend substantive changes. Changes that promote living with wildlife, rather than making individuals killable for convenience. The Committee, NPWS, and the government are well placed to act, to innovate, to support landholders to live with wildlife. To provide a guiding framework which enables innovation in working with landholders to co-exist alongside and amongst wildlife.[15] Substantive research has highlighted effective behaviour changes approaches.

> *'Behavioural interventions can offer novel opportunities or outcomes and are generally viewed as being less intrusive and less harmful.'*[16]

These approaches place the emphasis onto working towards behaviour change of wildlife — individuals, groups and more broadly — leading to significantly less harm, and provide a shift away from lethal approaches. Approaches which benefit everyone.

A change in approach has an added benefit of reducing an additional burden imposed on the volunteer wildlife rescue and rehabilitation sector, the social and emotional wellbeing of rescuers and carers, and to reflect community expectations that our unique and precious wildlife are protected. That Departmental and government processes are designed and implement so that wildlife can survive and thrive in NSW.

The licensing program is not fit-for-purpose

The current licensing program and application form are explicitly centred on anthropocentric land use at the explicit exclusion of wildlife, positioning wildlife — individual animals — as an impediment rather than them living in their home. The underlying cause being anthropogenic impacts.

Landholders can apply for a licence without providing details or evidence of measures to co-exist with wildlife, or any indications of (economic) impacts from sharing habitat and land with wildlife.

---

[15] Wallach, A.D., Bekoff, M., Nelson, M.P., & Ramp, D. (2015). Promoting predators and compassionate conservation. *Conservation Biology*, 29(5), pp. 1481-4. https://www.doi.org10.1111/cobi.12525.
Hill, C.M. (2021). Conflict Is Integral to Human-Wildlife Coexistence, *Frontiers in Conservation Science*, 2, 734314. http://www.doi.org/10.3389/fcosc.2021.734314

[16] van Dooren, T., Price, C.J., Banks, P.B., Oded Berger-Tal, O., Chrulew, C., Johnson, J., Lajeunesse G., E. Lynch, K.E., McArthur, C., Parker, F.C.G., Oakey, M., Pitcher, B.J., St. Clair, C.C., Ward-Fear, G., Sam Widin, S., Bob B.M. Wong, B.B.M., & Blumstein, D.T. (2023). The ethics of intervening in animal behaviour for conservation, Trends in Ecology and Evolution, 38(9), pp. 822-830. https://doi.org/10.1016/j.tree.2023.04.011

Of living with, and learning to live with, wildlife. The process is similarly founded on self-reporting, permitting our unuque and precious wildlife to be killed with effectively no Departmental or government oversight.

This approach does not reflect community expectations, and the centrality is on and of harm — a convenient euphemism for killing. The licencing program is not fit for purpose.

> *Our unique and precious wildlife are a valuable and valued part of the landscape. Their protection is expected by the broader community.*

The licensing program must shift in focus to support landholders to live, to co-exist, with wildlife, to ensure outcomes for wildlife are improved. Reflecting public expectations of government to act to protect our unique and precious wildlife.

An additional burden on the volunteer wildlife rescue and rehabilitation sector

The licensing program creates an additional burden on the volunteer wildlife rescue and rehabilitation sector. An invaluable community service that operates at an avoided cost to government — estimated in the tens of millions of dollars, annually.[17]

Alongside making the killing of wildlife permissible, the provision of licences to harm directly creates orphaned and abandoned animals, increasing the number of animals coming into care. The licensing program also creates circumstances in which locations where rescued and rehabilitated wildlife are released (in accordance with Codes of Practice, overseen by NPWS) are

[17] Haering, R., Wilson, V., Zhuo, A., & Stathis, P. (2021). A survey of veterinary professionals about their interactions with free-living native animals and the volunteer wildlife rehabilitation sector in New South Wales, Australia, *Australian Zoologist* 41(2), 254-282. https://doi.org/10.7882/AZ.2020.045.
Englefield, B., Candy, S., Starling, M., & McGreevy, P. (2019). The Demography and Practice of Australians Caring for Native Wildlife and the Psychological, Physical and Financial Effects of Rescue, Rehabilitation and Release of Wildlife on the Welfare of Carers, *Animals* 9(12), 1127. https://doi.org/10.3390/ani9121127.
Haering, R., Wilson, V., Zhuo, A., & Stathis, P. (2020). Towards a more effective model of local wildlife care with the volunteer wildlife rehabilitation sector: A survey of volunteers in New South Wales, Australia. *Australian Zoologist* 40 (4): 605–627. https://doi.org/10.7882/AZ.2019.018.
Haering, R., Wilson, V., Zhuo, A., & Stathis, P. (2018). Towards a more effective model of local wildlife care with the volunteer wildlife rehabilitation sector: A survey of volunteers in New South Wales, Australia. *AWRC Proceedings*.

potentially unsafe for them. Locations where a landholder may be permitted to kill or otherwise harm them. The lack of transparency of the program, limited community consultation or oversight, with a focus on self-reporting, is directly causal to such outcomes.

These bad outcomes for individual animals — as a result of government policy — place an additional burden on the volunteer wildlife rescue and rehabilitation sector — and worse still, directly impacts the social and emotional wellbeing of carers. Carers who are dedicated volunteers, well respected in the community, and provide an invaluable public good.

WIRES volunteers respond to incidents where wildlife are caught in traps, traps laid by individuals approved under a NPWS licence to harm. Individual animals who are left in traps for days at a time, causing significant harm and potentially fatal injuries. Whereas the fortunate ones recover — due to the dedication and care of volunteers — these are clear examples of an additional burden the licensing program places on the volunteer wildlife rescue and rehabilitation sector.

Other instances include trapped animals relocated (translocated) significant distances way, where the individual should (or does) know that they will not survive. Across numerous incidents where such breaches of Codes of Practice have been observed, responsible individuals have either intentionally avoided being identified, or the structure of the licensing program itself makes it possible for them to be non-identifiable.

Linked to repeated exposure to traumatic injuries, 25% of volunteer wildlife carers who responded to a national survey described experiencing moderate to severe grief.[18] The licensing program creates additional risks to wildlife, positions wildlife as an impediment, an inconvenience, and makes them killable, leading to additional animals requiring rescue and care. The increased burden placed on the volunteer wildlife rescue and rehabilitation sector compounds these impacts, affecting social and emotional wellbing.

The final report of the *Independent Review of the Biodiversity Conservation Act 2016* specifically noted that "providing care to sick and injured wildlife comes at a great financial and emotional cost to professional service providers and volunteers" and is "likely to prove unsustainable." The re-deployment of funding, staff and other resources currently assigned to the licensing program to support landholders to co-exist with wildlife, ensuring they are protected from harm, will directly reduce additional burdens imposed on the volunteer wildlife rescue and rehabilitation sector.

[18] Englefield, B., Candy, S., Starling, M., & McGreevy, P. (2019). The Demography and Practice of Australians Caring for Native Wildlife and the Psychological, Physical and Financial Effects of Rescue, Rehabilitation and Release of Wildlife on the Welfare of Carers, *Animals* 9(12), 1127. https://doi.org/10.3390/ani9121127.

Rescuers and carers already overwhelmingly feel that they, and the wildlife they care for, are underappreciated by government.[19] The licensing program directly contributes to this sense of underappreciation.

A shift in focus of the licensing program to support landholders to co-exist with wildlife, to mutually benefit, will lead to improved outcomes for wildlife, landholders, the volunteer wildlife rescue and rehabilitation sector, and reflect public expectations of government to act to protect our unique and precious wildlife.

Transparency and the public register of licences to harm

The Hon Penny Sharpe, Minister for Climate Change, Minister for Energy, Minister for the Environment, and Minister for Heritage — when a member of the opposition — was critical of the licensing program, risk-based approaches, and limited oversight.[20] The licencing program operates largely in obscurity, with limited transparency or accountability. A report prepared by Humane World for Animals refers to the licensing program as embodying a 'shockingly complacent lack of accountability.'[21]

Rather the providing a measure of transparency, the publishing of a 'public register of licences to harm' spreadsheet acts to obscure the scope and scale of the licensing program, including the number individual animals impacted and killed. The onus is placed on the public to attempt to analyse data, to cross reference, and seek to determine impacts.

[19] Englefield, B., Candy, S., Starling, M., & McGreevy, P. (2019). The Demography and Practice of Australians Caring for Native Wildlife and the Psychological, Physical and Financial Effects of Rescue, Rehabilitation and Release of Wildlife on the Welfare of Carers, *Animals* 9(12), 1127. https://doi.org/10.3390/ani9121127.

[20] Hunjan, R. (2016). Native animals to be killed 'without oversight' under biodiversity changes, NSW Labor says, ABD News, 2 October. https://www.abc.net.au/news/2016-10-02/native-animals-to-be-killed-biodiversity-act-nsw-labor/7896426

[21] Humane Society International Australia (2024) *Licence to Kill: The shocking scale of licensed wildlife killing in Australia*.

Cross referencing locations, years, species, numbers killed, and who was granted licences presents a significant challenge more suited to a data scientist.

An analysis of historical trends and current impacts must be provided by the Department, and presented to the public in an accessible and digestible format. Analysis is made much more difficult with limited information provided in the public register of licences to harm spreadsheet, itself an outcome of the licencing program based on self-reporting — including the number of animals killed and otherwise harmed.

Compounding the causal lack of transparency, and broad perceptions that the provision of licences to harm wildlife are intentionally obscure, the limited oversight of the program extend to the application process. Landholders can apply for a licence without providing any substantive evidence of human-wildlife conflict, economic impacts, or attempts made and actions taken to co-exist with wildlife.

Limited reporting, and (accessible) public dissemination of accurate information, reduces the potential for exposure and critique — ensuring the killing and harming of wildlife can continue largely in the shadows. Minimised oversight is testament to how implicitly problematic the program is, with limited transparency benefitting both landholders and reducing bureaucratic regulation of permissibility and the killing of our unique and precious wildlife.

Minimised potential oversight reduces the burden of the Department and landholders to reflect public expectations regarding acting to protect our unique and precious wildlife.

The structure of the licensing program itself makes it possible for harm, and those causing harm — including breaches of Codes of Practice, to be non-identifiable. This sits in direct contrast to the high standards the volunteer wildlife rescue and rehabilitation sector operate with — in line with public expectations about the care for and about wildlife. To state another way, the public good the volunteer wildlife rescue and rehabilitation sector provides is achieved in accordance with high standards of care. The harm (i.e. killing) made possible under the licensing program, is undertaken with limited oversight and without this standard of care.

The lack of transparency and accountability, which act to obscure the scope and scale of the killing of wildlife, with limited oversight, do not reflect public expectations of the Department and government. Further distrust is an outcome.

The lives of individual animals matter

At its core, the volunteer wildlife rescue and rehabilitation sector is testament to implicit and explicit recognition that the lives of individual animals matter. The broad community support, the engagement with individual rescue stories, the expressions of personal and shared grief, all convey that these lives matter.

Broad community support for the volunteer wildlife rescue and rehabilitation sector comes with a recognition that Australia's unique and precious wildlife are inherently and situationally vulnerable. That human impacts and influences are creating significant threats[22] — and a leading cause to individual animals requiring rescue and care. Land tenure itself directly correlates with harm and other impacts to wildlife.[23]

Individual animals and their lives are valuable. They matter.[24] They are living in their homes, a valuable and valued part of the landscape.

A fundamental new approach to the licensing program is needed. An approach which acknowledges and foregrounds that the root causes of human-wildlife interactions landholders are responding to through the licencing program — and that the licensing program itself provides a frame for based on misguided assumptions, infective and problematic actions. Situations which are anthropogenic in nature, often driven by avoidable human approaches to land use and management.[25] An approach which is based substantive research across a combination of better land use practices and behavioural change, supporting landholders and the broader community to implement effective measures founded on living with and amongst wildlife.

In other words, the licencing program must shift in focus to an emphasis on living with wildlife, and supporting landholders to co-exist

---

[22] Faria, C. (2023). Vulnerability and the Ethics of Environmental Enhancement, *Ethics, Policy & Environment*, 26(2), pp. 179–197. https://doi.org/10.1080/21550085.2023.2200725

[23] Kearney, S.G., Carwardine, J., Reside, A.E., Adams, V.M., Nelson, R., Coggan, A., Spindler, R., & Watson, J.E.M. (2022). Saving species beyond the protected area fence: Threats must be managed across multiple land tenure types to secure Australia's endangered species. *Conservation Science and Practice* 4(3), e617. https://doi.org/10.1111/csp2.617

[24] Steinhardt, M., Pratt, S., & Ramp, D. (2022). Re-Thinking Felid–Human Entanglements through the Lenses of Compassionate Conservation and Multispecies Studies, *Animals* 12, 2996. https://doi.org/10.3390/ani12212996

[25] van Dooren, T., Price, C.J., Banks, P.B., Oded Berger-Tal, O., Chrulew, C., Johnson, J., Lajeunesse G., E. Lynch, K.E., McArthur, C., Parker, F.C.G., Oakey, M., Pitcher, B.J., St. Clair, C.C., Ward-Fear, G., Sam Widin, S., Bob B.M. Wong, B.B.M., & Blumstein, D.T. (2023). The ethics of intervening in animal behaviour for conservation, Trends in Ecology and Evolution, 38(9), pp. 822-830. https://doi.org/10.1016/j.tree.2023.04.011

with wildlife, rather than positioning individual animals as an impediment and inconvenience.

Australia's unique and precious wildlife are inherently and situationally vulnerable. What is needed is an approach which reduces human impacts and the significant threats we create for wildlife. That should be the focus on NPWS, rather than a licensing program which makes individual animals killable.

Cultural consultation

Aboriginal peoples across NSW are holders of critical knowledge, founded on connection to country for tens of thousands of years — or more.[26] Aboriginal people have lived in, with and across landscapes adopting sophisticated practices in harmony with wildlife, guided by culture and lore.

The Indigenous Rangers program is an example of an integration of First Nations knowledge into environmental stewardship. The licensing program should be similarly founded on collaboration and consultation.

Collaboration and consultation with Aboriginal communities and elders must be grounded in respect for Indigenous people's rights to heritage and culture — including all cultural practices, traditional knowledge, resources and knowledge systems. WIRES' submission respects these rights as Indigenous Cultural and Intellectual Protocols (ICIP) and forming part of Indigenous Data Sovereignty (IDS) principles.

In working with Aboriginal people and their communities, the NSW Government must also ensure Free, Prior and Informed Consent (FPIC) — a specific right in the *United Nations Declaration on the Rights of Indigenous Peoples* — is gained for any and all reference to ICIP. Consent must be

[26] Reflecting and respecting the 2022 report *Reimagining Conservation Working Together for Healthy Country*, a collaboration of the Australian Committee for the International Union for the Conservation of Nature (ACIUCN), Protected Areas Collaboration for Learning and Research (PAC) and North Australia Indigenous Land and Sea Management Alliance (NAILSMA), the terms 'Aboriginal', 'Indigenous' and 'First Nations' are used interchangeably here. Through the use of these terms, WIRES seek to acknowledge and honour diversity, shared knowledge and experiences.

actively sought out, informed, and provided voluntarily without coercion, intimidation or manipulation.

A refocused licensing program, a program which an overarching aim of supporting landholders to co-exist with wildlife, must be based on *right-way science*. Right-way science is a process of western scientists working together with Aboriginal partners, based on listening, reciprocity, respect and learning.[27]

Conclusion

The *Inquiry into Licences to Harm Native Animals* provides an opportunity to shed light on a government-enabled practice which largely operates in the shadows. Under NPWS licensing hundreds of thousands of individual animals — our unique and precious wildlife — are permitted to be killed. The reasons included on the *Landholder's licence to harm native protected animals application* form are explicitly landholder- and economic-centred (i.e. explicitly anthropocentric, with little regard for wildlife) and largely a (problematic) response to anthropogenic causes.

> *Rather than identifying wildlife as being in their home and valued by the broader community as an important part of the landscape, they are reduced to an impediment. An inconvenience.*

The licensing program enables and promotes the making of our unique and precious wildlife as killable. Approaches that value the presence of our unique and precious wildlife, and promote the importance of working with wildlife — of coexistence, are largely given tokenistic mention. They appear little more than an afterthought.

The focus and approach of the licensing program, encapsulated in the provision of licences to harm, further contributes to making our unique and precious wildlife inherently and situationally vulnerable.[28] Additional human impacts and significant threats are created. Land tenure itself is directly correlated with impacts on wildlife and biodiversity, made possible by this state

[27] 'What is "right-way" science, Bush Heritage Australia. https://www.bushheritage.org.au/what-we-do/science/right-way

[28] Faria, C. (2023). Vulnerability and the Ethics of Environmental Enhancement, *Ethics, Policy & Environment*, 26(2), pp. 179–197. https://doi.org/10.1080/21550085.2023.2200725

sanctioned killing program.[29] A killing program which does not reflect community expectations of government, and is permitted to operate with little oversight based on self-reporting. Self-reporting which itself is incommensurable with good outcomes. Facilitating convenience for landholders above wildlife and the community who care about and for them, and reducing Departmental and government oversight. Limited oversight is directly evidenced in the list of reasons included on the *Landholder's licence to harm native protected animals application* form, the lack of transparency in reporting, and obfuscation of date in the public register of licences to harm spreadsheet.

Limited oversight creates a perception that wildlife do not matter. The licensing program enables the killing, and otherwise harming of wildlife, without transparent processes. With largely inaccessible or incomplete data on impacts, the program does not come close to meeting public expectations, making it possible for the legalised killing of our unique and take place effectively in the shadows.

WIRES recommendations reflect a need for a significant overhaul of the NPWS-managed licence to harm program. A critical refocus is essential, re-centring the program on our unique and precious wildlife, living and co-existing with wildlife rather than causing harm. Harm which is routinely used — implicit in the licensing program — as a euphemism for killing.

WIRES calls on the Committee and the *Inquiry into Licences to Harm Native Animals* to recommended much needed change. Changes to benefit our unique and precious wildlife, to reduce the burden on the volunteer wildlife rescue and rehabilitation sector — provided at a significant avoided cost to government, and to meet community expectations that our wildlife and protected by government. Not for them to be made killable.

> *'It is urgent that we learn to facilitate coexistence with wildlife in shared multi-use landscapes, for the wellbeing of both wildlife and people.' [30]*

[29] Kearney, S.G., Carwardine, J., Reside, A.E., Adams, V.M., Nelson, R., Coggan, A., Spindler, R., & Watson, J.E.M. (2022). Saving species beyond the protected area fence: Threats must be managed across multiple land tenure types to secure Australia's endangered species. *Conservation Science and Practice*, 4(3), e617. https://doi.org/10.1111/csp2.617

[30] Pooley, S.,Linnell, J.D.C., Münster, U., van Dooren, T., & Zimmermann, A. (2022). Understanding Coexistence With Wildlife [Editorial], *Frontiers in Conservation Science*, 3, 830971. https://www.doi.org/10.3389/fcosc.2022.830971

WIRES

WILDLIFE
INFORMATION
RESCUE AND
EDUCATION
SERVICE