

Overview of licences to kill in South Australia



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Licensing Framework

In South Australia, the killing of native wildlife is primarily regulated by the *National Parks and Wildlife Act 1972* (SA) (**NPW Act**) and the *National Parks and Wildlife (Wildlife) Regulations 2019* (SA) (**Wildlife Regulations**).

Under the NPW Act, it is an offence to take (i.e., hunt, catch, restrain, kill, or injure) a 'protected animal'.¹ However, a person is able to obtain a permit to hunt, catch, restrain, kill, or injure a protected animal (including an animal that is of a threatened species).² There are also some native species (e.g. dingoes) that are listed as 'unprotected species' under the NPW Act, which means they are not captured by the definition of protected animal and can be harmed or killed without a permit in certain circumstances.

A permit may be granted under the NPW Act for a range of purposes. Relevantly, if a protected animal is causing, or is likely to cause, damage to crops, stock or other property, the Minister for Climate, Environment and Water (**Minister**) may grant a person a permit to take the animal.³ These kinds of permits are referred to on the Department of Environment and Water (**DEW**)'s website as Trap and Release Protected Animals Permits (**TRP**) and Permits to Destroy Wildlife (**PDW**).⁴ Given TRPs are not generally considered to be lethal, PDWs will be the focus of this overview.

While not set out in the legislation, the DEW's website says that possums may only be killed, under a PDW, on Kangaroo Island (i.e., not in other areas of the State).

Exceptions to the requirement to hold a permit

A person does not generally require a permit to remove or destroy:

- an animal of an “unprotected” species;⁵
- magpies or poisonous reptiles in certain circumstances;⁶
- a protected animal that is part of an “open season” (i.e., recreational hunting of native animals at certain times of the year) declared by the Minister.⁷

Unprotected species

Under the NPW Act, the following species are listed as “unprotected”:

- budgerygahs;
- red wattlebirds;
- grey-backed silvereyes;
- Australian ravens;
- galahs;
- little corellas;
- little crows;
- little ravens; and
- dingoes.

This means a person does not generally⁸ require a permit to harm or kill these animals.

Dingoes

Dingoes are recognised as both a native and pest species in SA. In designated areas, dingoes are treated as pests and people are required to lay lethal baits (i.e., poison like 1080) to kill them, or otherwise destroy them.⁹ This is because dingoes are perceived as a threat to the sheep industry.¹⁰ Outside these areas, dingoes are not declared a pest but are an “unprotected” species. While the South Australian Government says dingoes in these areas are valued for their cultural and ecological roles, they may, nevertheless, be killed without a permit. This is primarily because they are perceived as a threat to the cattle industry in



these areas.¹¹ Outside of the designated areas, dingoes may be shot, trapped, and poisoned.¹² As permits are generally not required to kill dingoes on any land in South Australia,¹³ it is not known how many are killed every year.

A person will also not require a permit to destroy a wombat burrow if:¹⁴

- the burrow is outside a Wombat Burrow Protection Zone;¹⁵ and
- the person is the owner of the land where the burrow is located or is authorised to destroy, damage or disturb the burrow by the owner of the land where the burrow is located; and
- the burrow is causing, or is likely to cause, damage to crops, stock, machinery or infrastructure (including tracks and built structures) or may constitute a safety risk or hazard to people.

Methods used to take wildlife

Aside from providing that a permit may authorise the use of poison,¹⁶ the NPW Act does not specifically address which lethal methods a person may use to destroy native wildlife.

Based on the DEW's website, it appears shooting is the most commonly permitted method under a PDW. However, poison and gas also appear to be used to kill native animals in some circumstances.

If a person is shooting wildlife, they must also comply with the *Firearms Act 2015* (SA).¹⁷ A person is not required to pass a shooter proficiency or species identification test under the NPW Act or the Wildlife Regulations to kill native animals under a PDW, although they may be required to undergo a course, written examination, or practical examination in the safe handling, carriage, and use of a firearm under the Firearms Act.¹⁸ The DEW encourages private landholders to use professional shooters to carry out any killing under a PDW on their behalf.¹⁹

A person acting under a PDW (and a TRP) must also comply with the *Animal Welfare Act 1985* (SA).²⁰

Numbers of native animals licensed to be killed in SA

The South Australia Government does not maintain a public register of permits issued under the NPW Act or otherwise publish information on the number of permits issued and for what species, or numbers of animals killed.²¹ However, the DEW provided some of this information on request.²²

To provide a snapshot, in 2023, approximately 84,618 native animals were authorised to be killed by private landholders under PDWs. This included:

- **61,000 macropods**, including eastern and western grey kangaroos, red kangaroos and tammar wallabies.
- **20,663 native birds**, including rainbow lorikeets, Adelaide rosellas, emus, welcome swallows.
- **1,595 brushtail possums**.
- **1,360 southern hairy-nosed wombats**.

While permit holders are required to submit reports, which include the numbers of animals taken under a PDW, and this information was requested from the South Australian Government, it was not provided. It is therefore not known how many native animals are killed in South Australia every year. As noted above, it is also not known how many dingoes are killed in South Australia in any given year.

Application, assessment & enforcement

Applications

An application for a PDW must be:²³

- made in the required manner and form; and
- accompanied by the relevant fee. However, at present, no permit fee applies.²⁴

The PDW application form is available for download on DEW's website.

The form asks the applicant several questions, including if they have used non-lethal methods to minimise the impacts or damage caused by the protected animal. If the answer is yes, the applicant is then asked to list the non-lethal methods used, length of time trialled, and the outcome. Specific details regarding the number and proposed method of take are also requested. While a person is required to list the impacts or damage being caused by the animal, proof of same is not requested.

Unlike other jurisdictions (e.g. Victoria), any person that wishes to control wildlife under the permit (in addition to or instead of the applicant) must also be listed on the application form, along with their residential address and whether they hold a current firearms licence and in which category.

The DEW has a website on 'wildlife permits', which includes information on managing, controlling, and destroying wildlife. This website advises landholders to consider a "living with wildlife" approach in the first instance and provides a link to the DEW "living with wildlife" page. This page explains what a living with wildlife approach involves, outlines the DEW's principles for managing wildlife, and directs visitors to a handful of species-specific fact sheets, which provide suggestions on how to live with and manage different species, including by adopting non-lethal methods. These resources say that DEW encourages landholders to undertake non-lethal management approaches to mitigate wildlife impacts "where practical". However, they (and all relevant websites) then outline the pathway to applying for a PDW, saying there are situations where non-lethal methods are not effective or appropriate to address the impacts caused by wildlife.

While the guidance on making an application for a PDW says that a PDW may be granted when non-lethal methods have been considered and, "where appropriate", used, the legislation itself does not require non-lethal methods to have been trialled/exhausted before an application is made for a PDW.

Assessment

The Minister may grant a PDW to any person if they are satisfied that it is desirable to allow that person to destroy animals that are causing, or are likely to cause, damage to the environment or to crops, stock or other property. The Minister may also grant a person a permit "for any other purpose that the Minister considers proper and not inconsistent with the objectives of the [NPW] Act."²⁵

The DEW's website says that the department will consider a variety of factors when assessing an application, including the species and number of animals to be destroyed, nature of the damage being caused by the animals, non-lethal techniques used to reduce the damage prior to applying for a permit (and their effectiveness), animal welfare and the proposed method of destruction, and potential impact to the wild population (ensuring that the conservation status of the species is not adversely affected).²⁶

However, these factors are not set out in the NPW Act or the Wildlife Regulations. Other than damage to the environment/crops/stock/property, there is no criteria in the legislation which the Minister is bound to consider when deciding whether to grant a PDW. This, along with the fact that the Minister may grant a permit for "any other purpose", gives the Minister broad discretion to give someone permission to kill native wildlife. Notably, the Minister is not legally required to consider whether a landholder has trialled/exhausted non-lethal methods of managing wildlife before issuing a PDW. It is unclear whether DEW officers meet with applicants, or organise site-inspections, to assist with the assessment process, including to confirm the extent of damage being claimed to be caused by the relevant animal, or the trial of non-lethal methods.

The Minister may refuse to grant a permit if for example the applicant should fulfil certain requirements specified by the relevant authority before the permit is granted and the applicant has not fulfilled those requirements.²⁷ In theory, this provision could be used to refuse to grant a person a PDW that has not provided comprehensive evidence of the issue/damage being said to be caused by the animal, or has not exhausted non-lethal methods, but it is unknown if that occurs in practice (or whether applications for PDWs are ever rejected). The Minister may also refuse to grant a PDW if, in their opinion, the applicant is not a fit and proper person to hold the permit.²⁸

Post-Approval

If a TRP is granted, the Minister may attach conditions. The South Australian Government does not have a publicly available set of “standard” conditions that are ordinarily imposed on a PDW (like in NSW for example). The kinds of conditions that are usually attached to a PDW are therefore unknown. However, as per the NPW Act, the conditions imposed by the Minister may limit the areas in which, and number of, protected animals that may be taken under the permit.²⁹ A condition may also require compliance with a specified code of practice, standard, or other document.³⁰

The current codes of practice (most³¹ of which are almost 20 years old) relevant to a PDW include:³²

- *Code of Practice for the humane destruction of birds by shooting;*
- *Code of Practice for the humane destruction of wombats by shooting;*
- *Code of Practice for the humane destruction of common brushtail possums by shooting;*
- *Code of Practice for the humane destruction of flocking birds by trapping and carbon dioxide narcosis;*
- *National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Non-commercial Purposes;*

While not set out in the NPW Act, the DEW website says that if an application for a permit is successful, the person must destroy wildlife using the most humane method to minimise the animals suffering. The DEW advises that the codes of practice will assist with this.

The DEW website also says that where a code of practice does not exist, a person must comply with the animal welfare requirements specified in the *Animal Welfare Act 1985*.

A person acting under a PDW must comply with any limitations, restrictions, conditions on the PDW.³³ If a person contravenes, or fails to comply with, a condition of a PDW, the holder of the PDW will be guilty of an offence, even if they were not the person responsible for the contravention.³⁴

A PDW is valid for 12 months unless a shorter time is specified on the permit.³⁵

Within 14 days after a PDW has expired, the permit-holder is required to provide a report to the Minister which states the number of animals of each species that have been taken under permit.³⁶ A template report is provided with the application form. It is not clear whether a person is required to report on whether any (and if so, how many) non-target animals have been harmed or killed (there is otherwise no legal requirement to do same).

There is no public register of permits, or any publicly available information which records the number of permits that have been granted in any given year and for what species. While some of this information was provided on request, it is not known how many native animals are actually killed in total in South Australia every year (because this information, although requested, was not provided).

Enforcement

The Minister may revoke a PDW at any time,³⁷ including if the holder of the permit has, in the opinion of the Minister, contravened or failed to comply with any conditions of the permit.³⁸

If the Minister refuses to grant or revokes a PDW, the applicant or holder of the PDW may apply to the South Australian Civil and Administrative Tribunal for review of the Minister's decision.³⁹

It is not known whether, in practice, the DEW ensures that permit holders are complying with the conditions of their permits (or that people are complying with the NPW Act/Wildlife Regulations and are not killing native wildlife unlawfully). However, there are powers in the NPW Act/Wildlife Regulations that may be used for these purposes.⁴⁰ The DEW does not appear to publicly report on any compliance and enforcement activities carried out under the NPW Act/Wildlife Regulations.

There are no third-party civil enforcement provisions specifically provided for in the NPW Act or the Wildlife Regulations, however, such proceedings may be available under other avenues.

► See page 9 for South Australia's performance against the governance criteria.⁴¹



Recommendations for reform in South Australia

HSI Australia supports wildlife coexistence and urges the South Australian Government to reconsider its approach to managing perceived conflicts between private landholders and native animals.

To this end, our overarching recommendation is that the South Australian Government provides increased resourcing to the DEW to fund trials of non-lethal methods for managing wildlife, and provide training, capacity building, and workshops for DEW staff and landholders on wildlife coexistence.

However, while we oppose permits, we make the following recommendations to ensure a more robust, transparent, and accountable system that prioritises non-lethal strategies, tolerance, and human-wildlife co-existence.

► Amend the NPW Act to:

- recognise animal sentience.⁴²
- amend the definition of 'protected animal' to remove the reference to schedule 10 (unprotected species) and repeal schedule 10.
- prohibit the grant of a PDW to kill endangered, vulnerable and rare species.
- revoke the provision which allows a person to kill magpies and poisonous reptiles.
- prohibit the use of poison like 1080 (and the Minister authorising the use of poison) and the use of other substances (e.g. carbon dioxide) to kill any wildlife.
- require a permit licence fee.
- prescribe additional criteria (i.e., mandatory relevant considerations) that the Minister must take into account when considering whether to grant a PDW. The Minister should be required to consider whether the applicant has exhausted non-lethal management methods before applying for a PDW to kill native animals, and precluded from granting a PDW if the applicant has not demonstrated that they have exhausted non-lethal methods. The Minister should also be required to consider any likely ecological impacts (on target and non-target species, as well as the environment more generally), and to seek advice from the Parks and Wilderness Council.
- require an applicant for a PDW to provide comprehensive evidence of the issue/damage being said to be caused by the animal. Also define the term 'damage' in section 53(1)(c) and introduce a minimum damage threshold that must be reached in order that the Minister may grant a PDW.
- require the use of a professional shooter, or a person to pass a specific wildlife shooter proficiency test, as well as a species identification test.
- require a person to report on how many animals they have killed under a permit, either within 1-2 weeks of the maximum take limit being reached or 6 months (whichever is the sooner). Also require a person to report on whether they have harmed or killed any non-target animals.
- require the DES or the permit holder to notify neighbouring properties of the grant of a permit and if/when the killing of native animals will be carried out under the permit.
- introduce third party appeal and civil enforcement rights.

Recommendations

► Increase resourcing for the DEW to:

- fund trials of non-lethal methods for managing wildlife.
- provide training, capacity building and workshops for landholders to promote wildlife coexistence.
- conduct site inspections, both during the permit application process to verify the need for a permit and throughout the term of the permit.
- carry out compliance and enforcement activities.
- carry out robust monitoring and reporting of animal populations.

► Review and update all codes of practice (with input from animal welfare specialists and ensure they are underpinned by contemporary science).

► Maintain a public register of PDWs and publish information on how many native animals are killed under PDWs on an annual basis. Also publish any relevant Population Management Plans and quotas (like those that are published for macropods killed for commercial purposes).

► Publicly report on monitoring of compliance and enforcement activities. Findings should be made available to the public, including on illegal killing, or when permit conditions have been breached, or permits suspended or revoked.

► The *Landscape South Australia Act 2019* and *Landscape South Australia Regulations 2020* should be amended (or an order made in the Gazette) to remove dingoes as a pest species in designated areas (and the use of the Dog Fence to persecute dingoes should be discontinued), and to prohibit the use of poison and traps on land adjoining the dog fence.

► The Animal Welfare Act should also be amended to prohibit the use of traps and poison.

South Australia's proposed Biodiversity Act

We note that the South Australian Government is currently developing the State's first, stand-alone Biodiversity Act and that feedback was sought in early 2024 on the *Developing a Biodiversity Act for South Australia Discussion Paper*. Humane Society International Australia provided a submission to the Discussion Paper.

In our submission, we noted that it was not clear how the Biodiversity Act would interact with existing legislation such as the NPW Act, and that the Discussion Paper did not address the killing of protected animals under permits issued pursuant to section 53(c) and (d) of the NPW Act. We suggested that the licensing regime currently provided for under the NPW Act should be incorporated in the Biodiversity Act (and removed from the NPW Act) so that the regime (if it were to continue) sits within a holistic biodiversity framework. Either way, we consider the current reform process presents a perfect opportunity to strengthen and modernise the licensing framework.

Performance of South Australia against governance criteria

Category	Criteria	Status under current law/policy	Result
Animal welfare	Use of professional shooters	Encouraged	!
	Shooter competency testing	Not required under the <i>National Parks and Wildlife Act</i>⁴³	✗
	Animal welfare laws apply	Yes, although lethal leg hold traps may be used on 'wild dogs' (which includes dingoes) and these traps are not permitted for use on other native wildlife	!
	Licence holder to be fit and proper person	Minister may refuse to grant a permit if the applicant is not a fit and proper person	!
Prioritise human/wildlife coexistence	Law requires applicants to demonstrate, and decision-maker to consider, wildlife coexistence efforts	There is no legal requirement for applicants to trial non-lethal methods before applying for a permit (although the permit application form says that a permit may be granted when non-lethal methods have been considered and "where appropriate" used). Similarly, the Minister is not required by law to consider whether the applicant has/has not trialed non-lethal methods.	!
	'Living with wildlife'/ non-lethal control policy and guidance	The Department of Environment and Water have "principles for managing wildlife" and asks landholders to consider a 'living with wildlife' approach. A number of comprehensive, species-specific, factsheets are provided on the Department of Environment and Water's website, which include information on managing wildlife with non-lethal methods.	⊙
	Landholder capacity building/training on non-lethal methods	Advised to contact National Parks and Wildlife office to discuss non-lethal wildlife management options	!
Landholder justification for the use of lethal control	Proof of damage/ issues caused by wildlife	The application form requires (not legislation) an applicant to specify the 'impacts or damage' caused by wildlife by ticking boxes and providing additional detail, but seemingly not required to provide proof of same (although the form says that applications are assessed with consideration to the extent of economic/environmental damage being caused or likely to be caused by wildlife)	!
Licences	Identification of all persons acting under the licence	Yes	⊙
	Reporting requirements	Within 14 days of permit expiry	!
	Report non-target animals harmed	There is no explicit requirement	✗
	Licence lengths	12 months (unless a shorter time is specified on the permit)	⊙

Transparency	Government maintains public register/publishes licence data, including number of animals reported killed	No public registry, and the Department of Environment and Water does not publish permit data, however, some information was provided upon request in a timely manner (and free of charge). The number of animals reported to have been killed by landholders was not provided, but those numbers are likely held by government given permit holders are required to report on this information	
	Public reporting of compliance and enforcement activity	No	
Responsibility for conservation	Obtain licence to kill threatened species	Yes (although not known how often, if ever, it occurs)	
	Population Management Plans (PMPs) and non-commercial quotas for species	If PMPs and quotas exist, they are not publicly available (except for macropods killed for commercial purposes)	
	Unprotected native species	Generally do not need a permit to kill: zebra finch, budgerygah, red wattlebird, grey-backed silvereye, Australian raven, little crow, Australian crow, little raven, galah, little corella, dingo	
	Decision-maker considers environmental impacts	Not required by the <i>National Parks and Wildlife Act</i>, however, the permit application form says that applications are assessed with consideration to ecological sustainability and species conservation	
Enforcement	Community empowered to enforce breaches of a licence or legislation	No third-party civil enforcement provisions in the <i>National Parks and Wildlife Act</i> but possible under other avenues	

Key



Controls that should be in place if killing of wildlife by private landholders is allowed.



Some controls in place but improvement required.



Controls not in place and significant improvement required.

Endnotes

¹ NPW Act, section 51. Also section 5 for the definition of 'take' and 'protected animal'. 'Protected animal' means any mammal, bird or reptile indigenous to Australia, or any migratory mammal, bird or reptile that periodically or occasionally migrates to, and lives in, Australia, or any animal of a species referred to in schedule 7 (endangered species), schedule 8 (vulnerable species), or schedule 9 (rare species), or any animal of a species declared by regulation to be a species of protected animals, but does not include animals of the species referred to in schedule 10 (unprotected species) or any animals declared by regulation to be unprotected.

² NPW Act, section 53.

³ NPW Act, section 53(1)(c).

⁴ Other permits may be granted for harvesting protected animals for commercial purposes where a plan of management has been adopted (e.g. Kangaroos) – see NPW Act, Part 5, Division 4B. These, along with other kinds of permits (e.g. for scientific procedures, destroying wombat burrows, hunting) are not addressed in this report.

⁵ See definition of 'protected animal' in section 5 and Schedule 10.

⁶ NPW Act, section 53. For a Magpie, the circumstances are that the Magpie has attacked or is attacking any person. For poisonous reptiles, the reptile must have attacked, be attacking, or be likely to attack any person, or be in dangerous proximity to any person, or in such proximity as to cause reasonable anxiety to that person.

⁷ NPW Act, s 52.

⁸ There are some exceptions. E.g. clause 5 of the *National Parks and Wildlife (Hunting) Regulations 2011* (SA) provides that a person will require a permit if they wish to harm or kill a galah or a little corella by a method other than shooting (e.g. by way of carbon dioxide narcosis).

⁹ See section 192 of the *Landscape South Australia Act 2019*, clauses 24 and 25 of the *Landscape South Australia Regulations 2020*. Also, *South Australian Government Gazette* No. 57 (26 August 2021), pp 3334 and 3336 available at: https://www.governmentgazette.sa.gov.au/2021/August/2021_057.pdf.

¹⁰ See *South Australian Wild Dog Management Strategy 2023-2033* available at: https://www.pir.sa.gov.au/__data/assets/pdf_file/0006/438513/sa-wild-dog-management-strategy.pdf.

¹¹ See *South Australian Wild Dog Management Strategy 2023-2033* available at: https://www.pir.sa.gov.au/__data/assets/pdf_file/0006/438513/sa-wild-dog-management-strategy.pdf.

¹² Clause 9 of the *Animal Welfare Regulations 2012*. See also section 195 of the *Landscape South Australia Act 2019* (SA) and the South Australian Wild Dog and Dingo Policy available at: https://pir.sa.gov.au/__data/assets/pdf_file/0007/388159/declared-animal-policy-wild-dog.pdf.

¹³ NB: A person may require a basic hunting permit depending on the circumstances, however no reporting is required under these kinds of permits.

¹⁴ NPW Act, section 68AA(3).

¹⁵ Wombat Burrow Protection Zone means an area declared by the Minister by notice in the Gazette to be a Wombat Burrow Protection Zone for the purposes of this section.

¹⁶ NPW Act, section 65.

¹⁷ This is noted on the application form for a PDW, but not in the NPW Act or Wildlife Regulations themselves. It may be a condition of a PDW to comply with the Firearms Act. The application form also says that shooting of wildlife must only be carried out by the holder of an appropriate firearms licence from one of the following licence categories: Category 3 (hunting), Category 5 (primary production), Category 7 (contract shooter), Category 12(v) or 12(viii) (miscellaneous).

¹⁸ See Firearms Act, Part 2, Division 4 and *Firearms Regulations 2017* (SA), clause 28. The PDW Application says shooting of wildlife must only be carried out by the holder of an appropriate firearms licence from one of the following categories: Category 3 (hunting), Category 5 (primary production), Category 7 (contract shooter), Category 12(v) or 12(vii) (miscellaneous). Category 12(vii) relates to conservation purposes. Although not within the scope of this report, it is noted that a person harvesting kangaroos for commercial purposes is required, by the *National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes*, to pass an approved shooting accuracy test at least every five years (see p. 7).

¹⁹ See for e.g., page 3 of the Permit to Destroy Wildlife application form available at: <https://cdn.environment.sa.gov.au/environment/docs/Permit-to-Destroy-Wildlife-application-form.pdf>.

²⁰ There is nothing in the NPW Act, Wildlife Regulations or the Animal Welfare Act which excludes the operation of the Animal Welfare Act to any act carried out, or not carried out, under a TRP or PDW.

²¹ It also appears that the South Australian Government does not publish Population Management Plans or quotas which set the maximum number of animals that may be killed on an annual basis (except for kangaroos and wallabies that are killed for commercial purposes).

²² The DEW did not charge for the provision of this information or require a FOI application.

²³ NPW Act, section 69(1).

²⁴ See *National Parks and Wildlife (Fees) Regulations 2020*.

²⁵ NPW Act, section 53(d).

²⁶ See <https://www.environment.sa.gov.au/licences-and-permits/wildlife-permits/permit-types/manage-control-destroy-native-animals> and information set out in the species-specific fact sheets (e.g. <https://cdn.environment.sa.gov.au/landscape/docs/mr/living-with-wombats.pdf>). A list of factors which will, purportedly, be considered is also listed on the PDW application form.

²⁷ NPW Act, section 69(2a)(c).

²⁸ NPW Act, section 69(2a).

²⁹ NPW Act, section 53(5).

³⁰ NPW Act, section 69(4a).

³¹ The code of practice for wombats was updated in 2018.

³² Available at: <https://www.environment.sa.gov.au/topics/plants-and-animals/animal-welfare/codes-of-practice/codes-of-practice-humane-destruction-wildlife>.

³³ NPW Act, section 70A.

³⁴ NPW Act, section 70A(1).

³⁵ NPW Act, section 53(2).

³⁶ NPW Act, section 53(4). See also clause 6 of the Wildlife Regulations and Schedule 2. A holder of a TRP has additional reporting obligations (see Wildlife Regulations, clause 12).

³⁷ NPW Act, section 53(3).

³⁸ NPW Act, section 69(3)(b).

³⁹ NPW Act, section 53A. Note the applicant may apply for a review of the Minister's decision to either grant the permit subject to limitations, restrictions or conditions or as to the term of the permit.

⁴⁰ See, for example, Part 2, Division 3 of the NPW Act.

⁴¹ Humane Society International Australia developed a set of governance criteria for the *Licence to Kill* report to assess each jurisdiction's licensing framework. The governance criteria can be found on pages 27-29 of the *Licence to Kill* report.

⁴² We also recommend this be recognised in the Animal Welfare Act.

⁴³ NB: Under the *Firearms Regulation 2017 (SA)* a person may be required to undergo a course, written examination, or practical examination (or a combination of all) in the safe handling, carriage and use of firearms as nominated by the Registrar.

Disclaimer

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