

Overview of licences to kill in Tasmania



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Licensing Framework

In Tasmania, the killing of native wildlife is primarily regulated by the *Nature Conservation Act 2002* (**NC Act**) and *Nature Conservation (Wildlife) Regulations 2021* (**Wildlife Regulations**).

Under the Wildlife Regulations, a person must not take¹ 'specially protected wildlife',² 'partly protected wildlife',³ or 'protected wildlife',⁴ unless they are authorised to do so by a licence or permit.⁵

One way the NC Act authorises the killing of native wildlife is via a Property Protection Permit (**PPP**).⁶

PPPs allow private landholders to kill native animals that are said to be causing damage to stock, crops and/or any associated equipment or infrastructure.⁷

PPPs can specify a number of animals allowed to be killed. However, for species such as Bennett's wallabies, Rufous wallabies (Tasmanian pademelons) and brushtail possums, a PPP can allow an *unlimited* number of these animals to be killed.

While PPPs may be issued to control partly protected and protected wildlife, they cannot authorise a person to take threatened species (i.e. 'specially protected wildlife').⁸

Exceptions to the requirement to hold a licence

A person does not require a PPP to take wildlife that is not protected in Tasmania (e.g., animals that are not native to Tasmania, even though they may be native to Australia (e.g. Kookaburras)).⁹

Methods used to take wildlife

The NC Act and the Wildlife Regulations do not specifically address which methods a landholder may use to take native wildlife, although they do impose some prohibitions and restrictions.¹⁰

However, the Secretary of the Department of Natural Resources and Environment (**NRE Tasmania**) may authorise a person to use a method that would otherwise be prohibited, including, for example:¹¹

- a shotgun that has a bore that is greater than 12 gauge;
- a firearm that is fitted with a silencer;¹²
- a spear, cross-bow, bow and arrow or other form of projectile weapon;¹³
- a poison, chemical or other substance.

NRE Tasmania's website states that a PPP is required to poison wildlife and the PPP application form (discussed below) anticipates the use of 1080 poison to take wildlife.¹⁴

In addition to poison, shooting appears to be the most permitted method under a PPP.¹⁵

Whichever method is ultimately employed, a holder of a PPP must ensure that wildlife is killed 'humanely' and 'as soon as practicable',¹⁶ unless the permit says otherwise.

Additionally, the *Animal Welfare Act 1993* (Tas) applies to a holder of a PPP.

Numbers of native animals licensed to be killed in WA

The Tasmanian Government does not maintain a public register of PPPs, or publish any information about how many PPPs are issued and for what species, or how many animals are killed under a PPP.

However, the NRE Tasmania provided this information, both in response to an application under the *Right to Information Act 2009* (Tas) (**RTI Act**) and, subsequently, as part of the department's 'active disclosure' process under the RTI Act in response to a request made by Humane Society International Australia. To provide a snapshot, in 2023, the Tasmanian Government allowed approximately 27,728 native animals to be killed by private landholders under PPPs. This included:

- **21,119 native birds**, including black swans, sulphur crested cockatoos, and mountain ducks
- **6,502 forester kangaroos**
- **107 wombats**

As 'quotas' are not set for Bennett's or Rufous wallabies or possums, an unlimited number of these animals may be killed by private landholders. The Tasmanian Government is one of only jurisdictions that provided us with the number of animals that had been reported as killed under PPPs. They subsequently provided further information to the Tasmanian Greens in response to questions asked in parliament.

In 2023, approximately 675,640 native animals were reported as killed. This included:

- 1373 Australian shelducks (mountain ducks)
- 1231 Australian wood ducks
- 311,129 Bennett's wallabies
- 128,585 brushtail possums
- 104 black currawongs
- 900 Cape Barren geese
- 5816 Forester kangaroos
- 50 great cormorants
- 116 green rosellas
- 20 grey currawongs
- 30 little black cormorants
- 189 Pacific black ducks
- 36 purple swamphens
- 300 silver gulls
- 493 silvereyes
- 3874 sulphur crested cockatoos
- 917 Tasmania native hens
- 217,159 Rufous wallabies/Tasmanian pademelons
- 64 wombats
- 2 yellow tailed black cockatoos

The unlimited numbers of possums and wallabies that may be killed under a licence in Tasmania means this state has the highest known persecution of native wildlife in Australia, by far. The reported as killed figures in Tasmania dwarf the number of animals licenced to be killed in all other states/territories. Notwithstanding that, most other jurisdictions have not provided the number of animals reported as killed and some do not require licences to kill some species of bird or the dingo, which means that the actual numbers of those animals killed is unknown.



Application, assessment & enforcement

Applications

An application for a PPP must:¹⁷

- be made to the Secretary of NRE Tasmania;
- be in writing in an approved form;
- include the information that is required by the Secretary in respect of the application;
- include written evidence of all convictions for relevant offences, if any, within the period of 5 years immediately before the day on which the application is made (for both the applicant and each person to be listed on the permit if granted);
- accompanied by the relevant fee, if any.

At present, there are no fees associated with a PPP.¹⁸

Unlike other jurisdictions, if someone other than the applicant will be carrying out the control of wildlife (in addition to or instead of the applicant), they do not need to be listed on the application.

The NRE Tasmania has a website on wildlife management,¹⁹ and PPPs.²⁰ The PPP website also links to a fact sheet about PPPs and the application process, which includes a copy of the approved application form.²¹ A copy of the application form is also available for download on the PPP website.

The fact sheet states an application for a PPP must identify:

- properties to be listed on the permit;
- wildlife species damaging crops, stock, equipment or infrastructure;
- crops, stock, equipment, infrastructure or environmental asset being damaged by wildlife;
- method intended to be used to control the wildlife; and
- number of animals the applicant is applying to take.

However, there is no space on the application form to provide information on the crops, stock, equipment, infrastructure or environmental asset being damaged by wildlife, nor is there is any question directed at the financial loss likely to be suffered by the applicant if the PPP is not granted.

The fact sheet also states that if a person is considering applying for a PPP to use 1080 poison to control wallabies and possums as a last resort, they should, prior to submitting an application:

- read the *Code of Practice for Use of 1080 for Native Browsing Animal Management*;²² and
- ensure the person holds and has implemented a current PPP authorising the shooting of wallabies and possums on any property where the use of 1080 poison is intended.

Neither the PPP website nor the fact sheet or the application form indicate that a landholder is required to, or at least should, trial non-lethal methods first before applying for a PPP to lethally take native wildlife (and it is not a legal requirement to demonstrate this before applying for a PPP). However, the NRE Tasmania advised that all applications for use of 1080 poison to take wallabies and brushtail possums are subject to an on-site inspection during which a detailed application is completed and lodged by the applicant. This application will detail other methods of managing the impacts that have been employed such as wildlife-proof fencing and shooting.

The NRE Tasmania's 'living with wildlife' website does provide resources for landholders with wildlife management concerns. This includes guides for managing a number of species, including ducks, brush-tailed possums, eagles and hawks, kangaroos and wallabies, and Tasmanian devils and quolls. These guides provide information about the relevant species and suggestions for managing the animals, without harming them.²³ However, these guides also suggest that lethal management methods may be required in certain circumstances. For example, the guide for kangaroos and wallabies says that "if all else fails", a permit may be issued to lay 1080 poison and the number of wallabies routinely reported killed indicates that killing is not discouraged in practice.

There is also another website directed at 'managing wildlife browsing and grazing losses', which provides guidance on how to control losses caused by wallabies and possums.²⁴ While this website provides some, limited, suggestions for using non-lethal methods, it includes statements such as *"effective shooting should be part of an integrated browsing management approach, which combined with fencing and other tools can provide great returns for your investment"* and *"fencing is cost effective... but should be undertaken in conjunction with other control methods such as shooting, trapping and the judicious use of 1080 poison"*, which make it clear that the Tasmanian Government condones, and even encourages, the use of non-lethal methods to control wildlife, whilst also claiming to protect them.

It is not clear in what circumstances the NRE Tasmania, or Game Services Tasmania²⁵ (who is responsible for the day-to-day management of the PPP system) undertakes site inspections to test a landholder's claim about damage being caused by wildlife before an application is submitted or while it is being assessed. However, the NRE Tasmania's Annual Report for 2022 states that Game Services Tasmania undertook property inspections and stakeholder engagement "as necessary" to assess 1,435 property protection and special purposes permit applications.²⁶

Assessment

If the Secretary of NRE Tasmania is satisfied that a PPP is required for the purpose of protecting crops or stock or equipment or infrastructure, and the holder of the permit is likely to suffer financial loss if the crops, stock, equipment or infrastructure are not protected, the Secretary may grant the PPP.²⁷

The Secretary may grant the PPP subject to conditions.²⁸

The Secretary may also refuse to grant the PPP.²⁹

The Secretary will not grant a PPP if they are satisfied that the applicant (or another person named on the application) has committed a 'relevant offence' within the last five years.³⁰

Aside from the 'protection' of crops, financial loss and the applicant's relevant offence history, there is no other criteria which the Secretary must consider or be satisfied of when deciding to grant a PPP, meaning the Secretary has broad discretion to allow people to kill native animals. Indeed, the PPP website indicates that a PPP will be granted as a matter of course. It states *"an application may take five to ten working days to be processed. An approved PPP will then be posted or emailed to the applicant."*

No guidance on the assessment and decision-making process is provided on NRE Tasmania's website.

Problematically, while likely financial loss is a relevant consideration when the Secretary is determining whether to grant a PPP, the PPP application form does not ask the applicant for details of their financial circumstances or the loss they are "likely to" suffer if the PPP is not granted. It is therefore unclear how the Secretary reaches the required state of satisfaction to grant a PPP.

Approval

If the Secretary grants or refuses to grant a PPP, they must notify the applicant.³¹

Once granted, the holder of the PPP may authorise another person to perform an action under the PPP as if that person were the holder of the permit. However, that other person must be under the direction or supervision of the holder of the permit.³²

The PPP is to specify the conditions which apply to the PPP.³³ The Secretary has broad discretion to impose conditions that they consider “appropriate”.³⁴

Amongst others, conditions that may, but will not necessarily, be imposed on a PPP include:

- the species of wildlife that may be taken;³⁵
- the manner in which, and the method by which, that wildlife must be taken;³⁶
- the locations from which the wildlife may be taken;³⁷
- a requirement to comply with a code of practice or management plan;³⁸
- a requirement to tag, or otherwise identify, wildlife,³⁹ and the manner in which this occurs;⁴⁰
- a requirement to restrict or prohibit handling of the wildlife;⁴¹

The Secretary of NRE Tasmania may amend a PPP by adding, revoking, or varying a condition attached to the PPP.⁴²

Post-Approval

A holder of a PPP must comply with the conditions of the PPP.⁴³

If a person is shooting wildlife, they must adhere to the *Firearms Act 1996* (Tas).⁴⁴ A person is not required by the NC Act or the Wildlife Regulations to pass a shooter proficiency test to kill native animals under a PPP. However, in order to obtain a firearms licence in Tasmania, a person must complete a course in firearm safety.⁴⁵

A PPP is valid for up to five years, unless it specifies a different expiry date.⁴⁶ The PPP website includes a table which shows the maximum duration of PPPs for ‘common’ species (e.g., five years for Bennetts and rufous wallaby and brushtail possums and 12 months for wombat).⁴⁷

A person may apply to amend a PPP, or the Secretary may amend it on their own initiative.⁴⁸

While it may not necessarily be a condition of a PPP to keep records or complete a return, the Secretary may (but is not required to) ask the holder of a PPP to:⁴⁹

- keep records in relation to wildlife specified on the PPP or any other matters; and/or
- complete and provide a return (which may detail the number of animals that have been killed under the PPP).

The PPP website states that permit holders are required to maintain an annual record of the wildlife taken under the permit, including that of their agent and any zero take. It also states that: ‘take returns’ must be submitted to the NRE Tasmania within 28 days following the expiry of the permit and that further permits will not be issued to the owner or manager until the take details for any previous permits have been received.

It is understood that a standard condition which is imposed on a PPP requires a permit holder to complete and provide returns to the Secretary or the NRE Tasmania, including information on how many animals have been killed under the permit. The framework could be improved by ensuring this is expressly required by the Wildlife Regulations.

Unfortunately, it is impossible to know whether the number of animals killed recorded and reported by the permit holder is accurate.

Enforcement

The Secretary of NRE Tasmania may cancel a PPP if satisfied that there are grounds to do so.⁵⁰ If there are grounds to cancel the PPP, the Secretary may decide not to cancel it and suspend it instead.⁵¹

It is not known how, in practice, the NRE Tasmania ensures that PPP-holders are complying with the conditions of their PPPs, or that people are not taking wildlife without a PPP. However, there are enforcement powers in the NC Act that can be used for such purposes.⁵² Indeed, NRE Tasmania advised that internal compliance officers are supported by Tasmania Police who are authorised to ensure compliance with the NC Act and Wildlife Regulations, including the conditions of PPPs.

It is also unclear when, how often and what type of enforcement activities are carried out. The NRE Tasmania does not publish information about their monitoring of compliance or enforcement action in respect of the PPP system, although it appears questions about same have been asked and responded to at least once in Parliament.⁵³

There are no third-party civil enforcement provisions in the NC Act, which means it is not clear whether third parties could enforce breaches of the Act or the Wildlife Regulations (although NRE Tasmania advised that the public can and does regularly report alleged violations of the NC Act and Wildlife Regulations to NRE Tasmania and that these reports are investigated).

► See page 11 for Tasmania's performance against the governance criteria.⁵⁴



Recommendations for reform in Tasmania

HSI Australia supports wildlife coexistence and urges the Tasmanian Government to urgently reconsider its approach to managing perceived conflicts between private landholders and native animals. The numbers of animals killed in Tasmania is staggering.

To this end, our overarching recommendation is that the Tasmanian Government provides increased resourcing to NRE Tasmania and/or Game Services Tasmania to fund trials of non-lethal methods for managing wildlife, and provide training, capacity building, and workshops for NRE Tasmania/Game Services Tasmania staff and landholders on coexistence.

However, while we oppose licences, 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.

- ▶ Develop a 'living with wildlife' policy, which prioritises wildlife coexistence.
- ▶ **Amend the NC Act to:**
 - recognise animal sentience.⁵⁵
 - introduce third party appeal and civil enforcement rights so that any person may challenge the grant of a PPP, or remedy or restrain a breach of the NC Act/Wildlife Regulations (including a breach of a condition of a PPP).
- ▶ **Amend the Wildlife Regulations to:**
 - prohibit a person from applying for a PPP for lethal control unless they have tried to manage the wildlife by using available non-lethal methods and can demonstrate those methods have been exhausted and unsuccessful.
 - prescribe additional criteria (i.e., mandatory relevant considerations) that the Secretary must consider when considering whether to grant or refuse to grant a PPP. The Secretary should be required to consider whether the applicant has exhausted non-lethal methods of control before applying for a PPP, and precluded from granting a PPP for lethal control if the applicant has not demonstrated that they have exhausted non-lethal methods. 'Financial loss' should be defined and a minimum threshold, relative to income or revenue, should be introduced. The Secretary should also be required to consider any likely environmental impacts, including cumulative impacts.
 - remove flexibility and discretion (e.g. cl 74 of the Wildlife Regulations which requires wildlife to be killed humanely but only 'as soon as practicable'. This provision also suggests that a permit may allow wildlife to be killed in a manner that is not humane. Such language should be removed).
 - define the word 'humane' and provide public guidance on what that means.
 - require applicants of a PPP to list, on the application form, all people that will be involved with undertaking the control of wildlife.
 - prohibit the use of poison to kill wildlife, including 1080 to kill native browsing animals.
 - require the use of professional shooters and/or require a person to pass a specific wildlife shooter proficiency test, as well as a species identification test.
 - reduce the validity of PPPs from five years to 12 months.

Recommendations

- codify the requirement for holders of PPPs to submit returns, which include information about how many animals, and what species, have been killed under a PPP, and the method by which they were killed. Also require permit holders to report on permit activities within 1-2 weeks of the maximum kill limit being reached, or every 6 months (whichever is sooner). Also require a permit holder to report, within 24 hours, any non-target animals are killed.
 - prescribe a fee for the application for a PPP.
 - require the NRE Tasmania 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.
- ▶ Amend the PPP application form to ask the applicant for information and comprehensive evidence on the property/equipment/infrastructure requiring protection as well as any damage being caused by the relevant wildlife and details (and proof) of the financial loss likely to be suffered if the PPP is not granted. The application should also ask for details of the applicant's financial circumstances (including business or other relevant income), so that the loss may be properly quantified and understood.
 - ▶ Provide more information on the NRE Tasmania's website to encourage tolerance and coexisting with wildlife, including non-lethal tools and techniques that can be adopted to manage wildlife without harming them, and sure this information is in one, central location and is readily available at the point of applying for a PPP (or preferably, before a person reaches information about the availability of a PPP).
 - ▶ Introduce enforceable mandatory codes of practice for all species killed under PPPs that are drafted with input from animal welfare specialists and are underpinned by the most contemporary science on animal welfare.
 - ▶ **Increase resourcing for the NRE Tasmania to:**
 - fund trials of non-lethal methods for managing wildlife.
 - provide training, capacity building and workshops for NRE Tasmania employees and landholders to promote wildlife coexistence, as well as subsidies to trial non-lethal management methods.
 - increase guidance available on the NRE Tasmania's website. Ensure this information is up to date, central, and readily accessible before a person applies for a permit.
 - conduct site inspections during the permit application process to verify the need for a permit (and inspections if and when a permit has been granted to monitor compliance).
 - carry out robust monitoring and reporting of animal populations, and develop and publish population management plans.
 - carry out compliance and enforcement activities.
 - ▶ Assign officers with the wildlife section of NRE Tasmania day-to-day responsibility of the PPP system (rather than Game Services Tasmania, despite Game Services being a part of NRE Tasmania).
 - ▶ Maintain a public register of PPPs and publish information about how many PPPs are issued annually and for what species, and how many animals are killed annually under those PPPs, including the methods by which they have been killed.
 - ▶ Publicly report on monitoring of compliance and enforcement activities (including when there has been any illegal killing, licence conditions have been breached, or licences suspended or cancelled).

Performance of Tasmania against governance criteria

Category	Criteria	Status under current law/policy	Result
Animal welfare	Use of professional shooters	The use of 'good shooters' is encouraged (and guidance is provided as to what that means)	
	Shooter competency testing	Not required under the NC Act/Wildlife Regulations⁵⁶	
	Animal welfare laws apply	Yes, although the Animal Welfare Act creates some ambiguity because cruelty and aggravated cruelty offences do not apply to the "hunting of animals" if done in a "usual and reasonable manner and without causing excess suffering. It is not clear if this captures animals killed under Property Protection Permits.	
	Licence holder to be fit and proper person	The Secretary will not grant a PPP if they are satisfied that the applicant (or another person named on the application) has committed a 'relevant offence' within the last five years	
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 PPP (and there is nothing that indicates non-lethal methods must be trialled before an applicant applies for a PPP)	
	'Living with wildlife'/ non-lethal control policy and guidance	No policy. The NRE Tasmania have a 'living with wildlife' website which provides some guidance (including fact sheets) on living with various species of wildlife. These fact sheets include some information on managing wildlife with non-lethal methods	
	Landholder capacity building/training on non-lethal methods	The 'Managing Wildlife Browsing and Grazing Losses' website states that the Department assists land managers to develop and implement effective integrated damage control strategies and that "staff are available to visit farms to advise on techniques and materials proven to achieve effective mitigation results and to work with landholders to develop an integrated browsing strategy tailored for their individual farming operation".	
Landholder justification for the use of lethal control	Proof of damage/ issues caused by wildlife	The PPP application factsheet says that applications must identify what crops, stock, equipment, infrastructure or environmental asset is being damaged, but there is no place on the form to provide any detail and proof is seemingly not required (although the factsheet states that the Department, when granting a PPP, must be satisfied that a financial loss is likely to occur)	
Licences	Identification of all persons acting under the licence	No	
	Reporting requirements	Not prescribed by legislation, but the PPP website says that returns must be submitted to the DENR within 28 days following expiry	
	Report non-target animals harmed	It does not appear to be a requirement	

Transparency	Licence lengths	Up to five years, unless it specifies a different expiry date. The NRE Tasmania website indicates that PPPs for Bennetts and rufous wallaby and possums will be granted for 5 years, whereas PPPs for wombats will be granted for 12 months.	!
	Government maintains public register/publishes licence data, including number of animals reported killed	No public registry, and the NRE Tasmania does not publish licence 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 licence holders appear to report on this information	!
	Public reporting of compliance and enforcement activity	No	✗
Responsibility for conservation	Obtain licence to kill threatened species	No	○
	Population Management Plans (PMPs) and non-commercial quotas for species	- All species that are native to Tasmania are protected - A person does not require a PPP to take wildlife that is not protected in Tasmania (e.g., animals that are not native to Tasmania, even though they may be native to Australia)	✗
	Unprotected native species	- In certain local government areas – Australian raven, Australian ringneck, butler's corella, eastern longbilled corella, galah, little corella, rainbow lorikeet, sulphur-crested cockatoo, western silvereye, euro - red kangaroo and western grey kangaroo - dingoes	!
	Decision-maker considers environmental impacts	Not required by the Wildlife Regulations (and nothing indicates it is a consideration)	✗
Enforcement	Community empowered to enforce breaches of a licence or legislation	No third-party civil enforcement provisions in the NC Act	✗

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 We note the word ‘take’ is not defined in either the NC Act or the Wildlife Regulations. However, we understand that the ‘taking of wildlife’ would include the killing/destruction of wildlife.

² As per clause 3 of the Wildlife Regulations, specially protected wildlife means wildlife of a species specified in Schedule 5 of the Wildlife Regulations (also listed under the *Threatened Species Protection Act 1995* (Tas) (**TSP Act**), although there is no reference to the listings in the TSP Act in the Wildlife Regulations or vice versa).

³ As per clause 8 of the Wildlife Regulations, partly protected wildlife are those species of wildlife specified in Schedule 8 of the Wildlife Regulations. These species are ‘game’ species that may be hunted in an ‘open season’. Clause 18(2) of the Wildlife Regulations provides that a person may only take partly protected wildlife during the open season for the wildlife unless they have a licence or permit which allows them to do otherwise.

⁴ As per clause 3 of the Wildlife Regulations, protected wildlife means wildlife of a species specified in Schedule 1 or 2 of the Wildlife Regulations. The species listed in Schedule 1 appear to be other native species not captured by Schedules 5 or 8. They include species of amphibians, birds, mammals, reptiles and some invertebrates.

⁵ Wildlife Regulations, clauses 16(1), 18(1), 19(1).

⁶ PPPs used to be known as ‘Crop Protection Permits’.

⁷ Wildlife Regulations, clause 34.

⁸ Clause 34 of the Wildlife Regulations states that a PPP only authorises the taking of protected wildlife or partly protected wildlife (i.e., not ‘specially protected wildlife’).

⁹ Note that some animals that are not native to Tasmania/Australia are still protected under the NC Act and Wildlife Regulations as game species (e.g., European fallow deer, common peacocks).

¹⁰ See Wildlife Regulations, Part 6. The *Animal Welfare Act 1993* (Tas), which applies to holders of a PPP, also prohibits the use of leghold and glueboard traps and snares (see section 12(1)).

¹¹ Wildlife Regulations, clause 63. These methods are ordinarily prohibited, but the Secretary may allow someone to employ them.

¹² It is noted that NRE Tasmania advised that the Commissioner of Police ultimately controls who may possess and use a suppressor (silencer) and to date they are extremely restrictive.

¹³ It is noted that NRE Tasmania advised that, to their knowledge, these methods have never been authorised.

¹⁴ It is noted that the NRE Tasmania advised that poison is only permitted when other methods including fencing and shooting or trapping have been shown to be ineffective.

¹⁵ NRE Tasmania advised that PPPs authorise the use of traps to catch animals, but that these traps are not considered lethal. However, a PPP may allow for humane destruction of the animal when captured in the trap.

¹⁶ Wildlife Regulations, clause 74.

¹⁷ Wildlife Regulations, clause 44.

¹⁸ See Schedule 3 of the Wildlife Regulations (Fees).

¹⁹ See <https://nre.tas.gov.au/wildlife-management>.

²⁰ See <https://nre.tas.gov.au/wildlife-management/management-of-wildlife/managing-wildlife-browsing-grazing-losses/property-protection-permits>.

²¹ See <https://nre.tas.gov.au/Documents/Property%20Protection%20Permit%20and%20SPWP%20for%20Zone%201%20Deer.pdf>.

²² Available here: <https://nre.tas.gov.au/wildlife-management/management-of-wildlife/managing-wildlife-browsing-grazing-losses/1080-poison/code-of-practice-for-the-use-of-1080-for-native-browsing-animal-management>.

²³ See, generally: <https://nre.tas.gov.au/wildlife-management/living-with-wildlife>.

²⁴ See <https://nre.tas.gov.au/wildlife-management/management-of-wildlife/managing-wildlife-browsing-grazing-losses>.

²⁵ Game Services Tasmania is a branch within NRE Tasmania.

²⁶ See page 36 of NRE Tasmania’s Annual Report for 2022 – 2023 available at: <https://nre.tas.gov.au/Documents/NRE%20Tas%20Annual%20Report.PDF>.

²⁷ Wildlife Regulations, clause 49(2) and 48(1).

²⁸ Wildlife Regulations, clause 48(1).

²⁹ Wildlife Regulations, clause 48(1).

³⁰ Wildlife Regulations, clause 48(2)(a). The Secretary may determine what constitutes a ‘relevant offence’ for the purposes of the Wildlife Regulations. It could include an offence under the *Animal Welfare Act 1993* (Tas) or the *Firearms Act 1996* (Tas) (see clause 4

of the Wildlife Regulations). The list of current 'relevant offences' is listed on NRE Tasmania's website, available at: <https://nre.tas.gov.au/wildlife-management/forms-permits-and-fees/relevant-offences>.

³¹ Wildlife Regulations, clause 50.

³² Wildlife Regulations, clause 34(1)(b).

³³ Wildlife Regulations, clause 50(2)(b).

³⁴ Wildlife Regulations, clause 52(1).

³⁵ Wildlife Regulations, clause 54(a).

³⁶ Wildlife Regulations, clause 54(b).

³⁷ Wildlife Regulations, clause 54(c).

³⁸ Wildlife Regulations, clause 52(2)(e).

³⁹ Wildlife Regulations, clause 52(2)(f).

⁴⁰ Wildlife Regulations, clause 54(d).

⁴¹ Wildlife Regulations, clause 52(2)(k).

⁴² Wildlife Regulations, clause 58(1).

⁴³ Wildlife Regulations, clause 52(3).

⁴⁴ This is noted on the PPP application form, but does not appear to be set out in the Wildlife Regulations or the Firearms Act. It may be that it is a condition of a PPP to adhere to the Firearms Act.

⁴⁵ Firearms Act, section 29(1)(d).

⁴⁶ Wildlife Regulations, clause 51(2).

⁴⁷ <https://nre.tas.gov.au/wildlife-management/management-of-wildlife/managing-wildlife-browsing-grazing-losses/property-protection-permits>.

⁴⁸ Wildlife Regulations, clause 58(2).

⁴⁹ Wildlife Regulations, clauses 90 and 91.

⁵⁰ Wildlife Regulations, clause 59(1).

⁵¹ Wildlife Regulations, clause 60(1).

⁵² See, generally, Parts 6 (enforcement) and 7 (infringement notices). See also Schedule 10 of the Wildlife Regulations.

⁵³ See for example: https://www.parliament.tas.gov.au/house-of-assembly/tailed-papers/2023/n/HATP5_30_05_2023.pdf. In response to a question asked about how many enforcement have been undertaken for failures to comply with PPPs, it was said that between 2010 and 2016, approximately 10 investigations were undertaken related to a breach of a property or crop protection permit, and that from 2017 to 'present' (in 2022), there were records of seven relevant investigations.

⁵⁴ 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.

⁵⁵ HSI Australia also recommends animal sentience is recognised in the Animal Welfare Act.

⁵⁶ NB: Although may be required if the person is a 'commercial harvester'. Under the Firearms Act, a person is required to complete a safety course (and may be required to do additional training) to hold a firearm.

Disclaimer

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This document was finalised in October 2024