



Animal Defenders Office
Using the law to protect animals

ABN: 12837355070 | Member: CLCNSW Inc. | GPO Box 2259 Canberra ACT 2601 | www.ado.org.au | contact@ado.org.au
The Animal Defenders Office Inc. is accredited by the National Association of Community Legal Centres.

Animal Biosecurity
Department of Agriculture, Water and the Environment
GPO Box 858
Canberra ACT 2601

Dear Sir/Madam

Feedback on Psittacine birds (household pet and aviary birds) – import risk review – draft report – July 2020

Thank you for the opportunity to provide feedback on the *Import risk review for psittacine birds from all countries – draft review* (“the draft report”).¹

About the Animal Defenders Office

The Animal Defenders Office (“ADO”) is a nationally accredited not-for-profit community legal centre that specialises in animal law. The ADO is run exclusively by volunteers and offers pro bono legal assistance to individuals and groups wishing to protect animals.

The ADO also produces information to raise community awareness about animal protection issues and works to advance animal interests through law reform.

The ADO is a member of Community Legal Centres Australia Inc, the peak body representing community legal centres in Australia.

GENERAL COMMENTS

The ADO does not support the importation into Australia of psittacine birds to be kept as household ‘pets’ or confined in aviaries.

The ADO’s position is based on a number of concerns, including animal welfare, animal health, and environmental issues. Our feedback in support of our position is set out below.

Background

Psittacine birds are defined in the draft report to include ‘lories, cockatoos, cockatiels, rosellas, lovebirds and parrots’.²

The importation of live psittacine birds into Australia was stopped in 1995 due to disease concerns in relation to Australia’s native parrot population. Since that time, certain sectors including pet owners and zoos have been calling for the ban to be lifted.³

¹ https://haveyoursay.awe.gov.au/psittacine-birds-household-pet-and-aviary-birds?tool=survey_tool#tool_tab.

² The draft report, ‘Glossary’, p. clxxxiii.

³ The draft report, p. 2.

Key concerns

Higher rates of parrot 'pet' ownership

The ADO is concerned that allowing psittacine birds to be brought into Australia for keeping as companion animals would lead to higher rates of parrot 'pet ownership' and, as a consequence, increased incidence of negative welfare outcomes for the birds.

Parrots are very intelligent, and it can be difficult to provide appropriate stimulation for them in captivity. They are also relatively long-lived, meaning that they require a long-term investment in care on the part of their human 'owners'.⁴

Even second and third generation parrots (i.e. bred in captivity and not taken from the wild) are essentially the same as wild birds, and therefore have the same needs as the latter: to spend the majority of the time flying; to forage for their food; and to spend time socialising with others of their species.⁵

In an analysis of the suitability of parrots as 'pets' using the 'Five Freedoms' framework, serious concerns have been found from the perspective of each of the Freedoms.⁶ The study found that many pet parrots may face nutritionally inadequate diets; infection with viral, bacterial, fungal and parasitic diseases; low levels of veterinary care; stress-related lesions arising from restricted movement; the absence of their most fundamental natural behaviours (i.e. flying and socialisation with other birds); and stereotypic behaviours, indicating psychological distress.⁷

Concluding the review of welfare factors impacting parrots as 'pets', the study noted that, "finding ways to replace the demand for parrots as 'pets' with a demand for preserving the species in the wild may be the best way to reduce captive parrot welfare problems and ensure the welfare of wild parrots and the environment."⁸ That is, the only way to improve the welfare of captive parrots is to reduce (if not eliminate) the number of captive parrots.

The ADO is concerned for the welfare of birds kept in cages and used for breeding or showing or sold as 'pets' because there are relatively few regulatory welfare controls in Australian jurisdictions. For example, the ACT and NSW have codes of practice for keeping birds in captivity, but they were written over 20 years ago in 1995 and 1996 respectively.⁹ It is not clear how (or if) the codes are enforced. It is also not clear whether birds proposed to be imported would be covered by Exhibited Animals Protection legislation in NSW, as only some birds in the order Psittaciformes are listed as requiring a permit to be displayed.¹⁰ The infamous case of the sulphur-crested cockatoo permanently confined in a cage in a car sales yard and wheeled out for the amusement of customers demonstrates the

⁴ Grant, RA, Montrose, VT & Wills, AP 2017, "ExNOTic: Should we be keeping exotic pets?", *Animals*, vol. 7, no. 47, pp. 1-11.

⁵ Ibid.

⁶ Engebretson, M 2006, "The welfare and suitability of parrots as companion animals: A review", *Animal welfare*, vol. 15, pp. 263-276.

⁷ Ibid, 264-8.

⁸ Ibid, 273.

⁹ *Code of Practice for the Welfare of Captive Birds*, 1995 (ACT); *NSW Animal Welfare Code of Practice No 4 - Keeping and Trading of Birds*, 1996.

¹⁰ *Exhibited Animals Protection Regulation 2010* (NSW), Schedule 2.

unconscionable welfare outcomes for birds who can be kept in captivity for display purposes but not protected by regulatory welfare schemes.¹¹

Overseas wildlife trade

A recent study of nearly 200 Neotropical parrot populations found that the (local and international) pet trade was the second most pressing threat to their survival.¹²

It may be difficult to determine whether a parrot is coming from a legal source, or whether, for example, she has been poached illegally from the wild and sold on to a legal breeding farm.¹³

The illegal wildlife trade is the third most profitable criminal industry worldwide, and is estimated to be worth \$8-10 billion annually.¹⁴

As a result of the illegal wildlife trade (and habitat loss), over one-third of parrot species is threatened with extinction.¹⁵

It has been noted that the illegal parrot trade is, currently, largely driven by domestic trade in countries such as Peru, Bolivia and Mexico, rather than by international trade.¹⁶ However, this is likely due to the introduction of strong wildlife protection legislation. For example, after the Wild Bird Conservation Act was passed in the United States in 1992, the number of parrots imported into the US dropped, and studies found that there was a reduction in levels of nest poaching in neo-tropical countries.¹⁷ This suggests that lifting the ban on parrot imports to Australia could result in an increase in overseas poaching behaviour.

Welfare of birds during importation

The draft report states that consideration was given to matters including the 'welfare requirements for the international movement of live birds in a safe manner'.¹⁸

There are significant morbidity and mortality concerns associated with wild capture and/or the transport of birds, whether in the context of legal or illegal markets.¹⁹ One study found that in Mexico, around three-quarters of parrots taken from their natural environments to be sold on the black market died in transit.²⁰

The ADO submits that there is a high likelihood of poor welfare outcomes for parrots captured and/or transported to Australia. The ADO suggests that, before lifting the ban

¹¹ <https://www.facebook.com/pages/category/Community/Free-Toyota-the-Australian-Native-Sulphur-Crested-Cockatoo-1535019349974702/>.

¹² Berkunsky, I, Quillfeldt, P, Brightsmith, D.J., Abbud, M.C., et al. 2017, "Current threats faced by Neotropical parrot populations", *Biological conservation*, vol. 214, pp. 278-287.

¹³ Schuppli, CA, Fraser, D & Bacon, HJ 2014, "Welfare of non-traditional pets", *Revue scientifique et technique*, vol. 33, no. 1, pp. 221-231.

¹⁴ Pires, SF 2012, "The illegal parrot trade: A literature review", *Global crime*, vol. 13, no. 3, pp. 176-190, at 176.

¹⁵ *Ibid*, 177.

¹⁶ *Ibid*.

¹⁷ *Ibid*.

¹⁸ The draft report, p. 2.

¹⁹ Engebretson 2006; Pires 2012.

²⁰ Pires 2012: p. 179.

allowing huge numbers of birds to be transported, more analysis needs to be undertaken into the welfare of parrots during transportation.

Health concerns—increased incidence of disease introduction and transmission

International wildlife trade has been responsible for several disease outbreaks around the world, affecting both human and animal health, and local and international trade.²¹

Diseases, such as avian chlamydiosis (“parrot fever”) may be transmitted from birds to humans. It has been noted that: “The importation of wild-caught birds significantly increases the disease risks associated with the pet bird trade. The mixing of birds from different geographical ranges coupled with close confinement and highly stressful conditions increases the susceptibility of imported birds to infectious organisms.”²²

The transmission of diseases from imported parrots to native species is another concern. This submission discusses in more detail below an example of a potentially fatal parrot-borne disease that threatens native parrots and that could become more prevalent if a ban on imported parrots is lifted.

Psittacine Beak and Feather Disease

‘Psittacine Beak and Feather Disease’ (Pbfd) is a highly infectious, viral disease that is fatal to parrots (especially juveniles). It is currently found in all regions of Australia, and the likelihood of its being eradicated is not high.²³

It is not retained in the draft report as a hazard of concern, because it is already present in Australia, and is not “nationally notifiable/under official control/eradication”.²⁴ The ADO submits, however, that the threat it poses to vulnerable native species should make Australians hesitant about increasing the risk of further outbreaks of Pbfd by increasing the number of imported parrots into Australia.

A survey of recovery plans that have been developed for 13 threatened parrot species in Australia showed that only four address the threat posed by Pbfd.²⁵ This suggests that Australia would not be well prepared to respond if further outbreaks of Pbfd were to spread in these populations of native parrots.

Environmental impact

Parrot owners who are no longer able or willing to look after their parrots may release them into the wild. Parrots kept as ‘pets’ can also escape. Released or escaped birds may establish wild populations that could impact on the wellbeing of native birds and the functioning of local ecosystems.²⁶

²¹ Karesh, WB, Cook, RA, Bennett, EL & Newcomb, J 2005, “Wildlife trade and global disease emergence”, *Emerging infectious diseases*, vol. 11, no. 7, pp. 1000-1002.

²² Engebretson 2006, p. 270.

²³ Department of the Environment and Heritage 2004, *Beak and feather disease (psittacine circoviral disease)*, report, accessed 14/9/20, <https://www.environment.gov.au/system/files/resources/a13239ba-fb01-4c31-9fa8-519dcbc593ca/files/p-c-disease.pdf>.

²⁴ The draft report, p. 22.

²⁵ Department of the Environment 2015, *Psittacine beak and feather disease and other identified threats to Australian threatened parrots*, report, accessed 14/9/20, p. 46.

²⁶ Engebretson 2006, p. 271.

The risks of the introduction of non-native species into the wild include the displacement of native species through “predation, hybridisation, pathogen transmission, or competition for resources”.²⁷

Given the decimation of populations of native animals after last summer’s bushfires, the ADO submits that introducing another potential risk to these populations (i.e. escaped or released imported parrots) is unjustifiable. The ADO notes that a report by the Wildlife and Threatened Species Bushfire Recovery Expert Panel, included five parrots among its list of 119 animal species designated “as the highest priorities for urgent management intervention”.²⁸

Recommendation:

That the ban on the importation of live psittacine birds remain in place.

Thank you for taking our feedback into consideration.

Serrin Rutledge-Prior
Senior Research Officer (Volunteer)

Tara Ward
Executive Director / Solicitor (Volunteer)

Animal Defenders Office

19 September 2020

²⁷ Schuppli, Fraser & Bacon 2014, p. 225.

²⁸ Wildlife and Threatened Species Bushfire Recovery Expert Panel 2020, *Provisional list of animals requiring urgent management intervention*, 20 March, Department of Agriculture, Water and the Environment, Australia, <https://www.environment.gov.au/system/files/pages/ef3f5ebd-faec-4c0c-9ea9-b7dfd9446cb1/files/provisional-list-animals-requiring-urgent-management-intervention-20032020.pdf>.