

# Compliance plan

## Wildlife Management

### Crocodile farm compliance plan 2016

#### Objective

This plan aims to develop a standardised compliance program for all QLD crocodile farms in order to fulfil EHP's reporting obligations to the Commonwealth Department of the Environment and to achieve a greater level of compliance for Queensland crocodile farming facilities.

This compliance plan will be consistent with the [Departmental Regulatory Strategy](http://www.ehp.qld.gov.au/management/planning-guidelines/enforcement.html) < <http://www.ehp.qld.gov.au/management/planning-guidelines/enforcement.html> >.

The approach to ensuring compliance with legislation is to:

- educate individuals, industry and governments about the laws and how to comply and to encourage voluntary compliance with obligations
- monitor compliance
- reward good performers
- respond to breaches of the legislation with consistent and proportionate enforcement action.

These activities can happen in two ways—they can be reactive, in response to a complaint or incident, or they can be proactive.

#### Wildlife Licences

There are currently 10 licenced crocodile farming facilities (Wildlife Farming Licence – Crocodile Farming).

#	Permit number	Company Name	Company Address
1	WIWF15102414	Hartleys Creek Crocodile Farming Company Pty Ltd t/a Hartleys Crocodile Adventures.	Lot 10 Cook Highway Wangetti (Cairns) Qld 4877.
2	WIWF03156313	Koorana Crocodile Farm.	65 Savages Road Coowonga (Rockhampton) Qld 4702.
3	WIWF13065813	Bonny Glen NQ Pty Ltd t/a Edward River Crocodile Farm.	Marranthan Street Pormpuraaw 4871.
4	WIWF13375713	Edward River Crocodile Farm Pty Ltd.	Marranthan Street Pormpuraaw 4871.
5	WIWF01953013	Crocpac t/a Cairns Crocodile Farm.	Redbank Road Gordonvale (Cairns) Qld 4865.
6	WIWF15388414	NB2 Farming Pty Ltd.	Melaleuca Crocodile Farm 301 Peters Road Mareeba Qld 4880.

#	Permit number	Company Name	Company Address
7	WIWF15913116	Aquafarm Pty Ltd.	Lot 3 Silkjar Street Balgal Beach (Townsville) Qld 4816.
8	WIWF17155716	HL Australia Ltd t/a Johnstone River Crocodile Farm.	281 Flying Fish Point Road Innisfail Qld 4860.
9	WIWF15921215	Pellemari Pty Ltd.	467 Bentley Drive Nome (Townsville) Qld 4816.
10	WIWF16963416	Clay Boaz Bartlett (Harvest Home Station).	4684 Mulligan Highway, Via Cooktown Qld 4871.

The compliance plan is developed in order to meet EHP's obligations under the

- *Nature Conservation Act 1992* (with respect to the protection and management of wildlife). Wildlife Farming Licences are issued under S11(I) Nature Conservation (Administration) Regulation 2006.
- *Environment Protection and Biodiversity Conservation Act 1999, Wildlife Trade Management Plan – Queensland Crocodile Farming (2014-2017)*. Under Section 9 of this plan, EHP is required to submit an annual report to the Australian Government. This requires the collection of information from Crocodile Farms.

An audit of current departmental practices has revealed improvements are required in the areas of:

- obtaining returns of operation
- the format of the returns of operation
- reviewing and compiling of movement advices
- inspections of crocodile farms.

The plan will result in a consistent approach to the compliance of crocodile farms across regions and consistency with the departmental regulatory strategy.

## Background

All Queensland crocodile farms are required to submit an annual returns of operation within 10 business days of the anniversary date of the licence as a condition of their Wildlife Farming Licence issued under S11(I) Nature Conservation (Administration) Regulation 2006.

The disposal of live crocodiles including eggs to and from licenced farms or zoos from within Queensland or from interstate is subject to the provisions of a wildlife movement advice or wildlife movement permit issued under the NCA.

The movement of an appropriately tagged whole skin into, within or out of Queensland requires a wildlife movement permit or wildlife movement advice issued under the NCA unless accompanied with a CITES export permit issued by the Australian CITES Management Authority.

Movements of carcasses and meat intrastate or interstate must only occur in accordance with a wildlife movement permit or wildlife movement advice issued under the NCA.

Movement Advices are currently the only way for the department to monitor the import of live crocodiles or eggs to Queensland crocodile farms.

Inspections of crocodile farms are undertaken by EHP in response to any compliance information that may require further investigation, or for permit assessment purposes such as inspections of new holding facilities.

## **Governance**

The Director, Wildlife Management is responsible for the implementation of the plan. The CO Unit will provide coordination of the overarching activities with Regional Managers providing operational coordination.

The new Connect system will enable improved administration. The electronic lodgement of application forms and electronic returns will also improve information management for both the customer and EHP. The compliance program will be maintained by CO Unit on the Wildlife SharePoint site using the Crocodile Farm Compliance Spreadsheet.

Industry consultation through correspondence will take place prior to any changes in order for farms to be made aware of their obligations. This will be coordinated by the CO Unit.

## **Returns of Operation and Movement Advices**

The Return of Operation (RO) form is amended to include import data and monthly records to make sure data being reported on is relevant to reporting requirements. Changes to this form will also affect other Wildlife Farming Licence holders (buffalo, butterfly and emu).

During farm inspections and/audits record books are audited and Movement Advice forms relevant to entries involving movements are sighted.

All Returns of Operation are assessed as per SOP Returns of Operation (under development).

Correspondence will occur with all farms that have not submitted RO forms by the due date. This will be handled in the same manner as the Scientific Purposes Permit returns with an escalation in the event of continuing non-compliance.

## **Farm Inspections/Audits**

Farm inspections/audits are to be undertaken of all licenced crocodile farms, as per the checklist during April/May in the first year (prior to compilation of report to Commonwealth) as per the Crocodile Farm Compliance checklist (under development).

A sample of the farms would be inspected in future years. This sample would be determined using a compliance prioritisation model based on an indication of risk.

The departmental Compliance Prioritisation Model (CPM) will be used to determine the risk but will prioritise based on:

- farms that had been identified as having matters of concern in a previous audit
- farms that may have been reported by members of the public or other government departments
- open source data, such as newspaper reports or legal cases involving the legal entity, and
- the time since the last audit.

Consistent with the Regulatory Framework and Enforcement Strategy, if animal care issues or environmental harm issues are identified during an audit, a notification will be provided to the Department of Agriculture and Fisheries (DAF) or the appropriate division of EHP for them to consider for further action.

### **Cooperation with Northern Territory**

It is proposed that EHP approach the Northern Territory Government to discuss the opportunity to facilitate the sharing of movement advices across jurisdictions. This will provide the capacity to audit the information on receipt of wildlife from the Northern Territory that is provided by farms as part of their return on operations. This will need to take into consideration any information that is commercial-in-confidence. Arrangements will be discussed over the next 12 months.