



THE TRINIDAD AND TOBAGO
FIELD NATURALISTS' CLUB

COMMENTS ON THE DRAFT FORESTRY, PROTECTED AREAS AND WILDLIFE CONSERVATION BILL 2014

*Kindly submit your comments on the Draft Bill using this form and return via email to policy.comments@gov.tt, fax to **624-2455**, or mail to: The Ministry of the Environment and Water Resources, Level 26, Tower D, Waterfront Complex, Wrightson Road, Port of Spain.*

Contact information(Optional- Comments can be provided anonymously)

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General Comments

Amphibians: The treatment of amphibians (except the GTF) by placing the group in the Fifth Schedule is unusual to say the least. They should be offered protection as well.

Research Permits: Section 85 - Clarification of "no research whatsoever" is required. It seems a strange priority when quarrying, illegal hunting, deforestation and pollution are far greater concerns to T&T's wildlife than scientists, and it would be a real shame if useful science (including that with conservation applications) is impeded by unnecessarily cumbersome procedures.

Invasive Species: While the issue of invasive species may be dealt with elsewhere, some of the basic offences should be listed. In addition to a schedule for invasive species, we would like it to become an

offence for anyone to introduce any of these invasive plants or animals into the country.

Hunting Season: It does not appear that the open and closed seasons have been declared.

Waterfowl Hunting. Freshwater habitats have disappeared quickly since the collapse of the rice industry. The pressures faced by freshwater birds are significant. We would like to see all ducks being protected as a result. They should be removed from the Fifth Schedule.

Specific Comments

Date	<i>30th June 2014. (Extension of 1 month from advertised deadline of 31st May 2014 was granted and confirmed by phone)</i>
Clause # <i>Insert clause number, sub number etc.</i>	Comment <i>(Enter each comment specific to the Clause number that is of concern to you in the draftBill)</i>
36 (8)	Remove the words "as reasonably possible". All development has to be consistent with the NFP.
38 (2)	Increase the minimum day's notice to 14 days. Two days is not enough time for officials to investigate felling on private properties.
68 (1) "Harvesting, Haulage or Transportation of Timber from Protected Areas"	There should not be a provision to extract trees from any protected area. This possibility must be denied entirely.
83 (2)	Why have 180 days to apply for protected species permit when the time limit for partially protected species permits is 12 days. The time limit for apply for a protected species permit should be reduced to 12 days as well.
85	No scientific research "whatsoever" is vague. This is a very unfortunate inclusion and we oppose it. Many practices fall into the bracket of research that are not invasive. Passive observation, like bird observation, is a research tool. Would camera trapping be illegal without a permit? Would a light trap for insects be illegal? Would sampling fish in a stream be illegal? Note that this applies to protected and non protected species alike. At the very least, this should be clarified to specify invasive research for protected species. It would be a real shame if useful science (including that with conservation applications) is impeded by unnecessarily cumbersome procedures.
77	It should be specified that hunting at night is prohibited. The penalty should be included

77	The date of opening and closing of the hunting season should be declared. This was done in the previous Conservation of Wildlife Act.
77	A penalty should be imposed for persons who are found in a game sanctuary without a permit to enter the sanctuary
77	A penalty should be imposed for persons who are found hunting without a valid hunting permit
51. PART IV DESIGNATION AND MANAGEMENT OF PROTECTED AREAS	Restricted activities in protected areas should include the usage of vehicles. This includes, but is not limited to, trucks, cars, motorcycles/ dirtbikes, ATV's and other off road vehicles. Such vehicles are a disturbance to wildlife and can directly threaten some species (eg. vehicles on beaches threaten turtle nests)
Second Schedule, SPECIES OF TREES FOR WHICH A PRIVATE TIMBER HARVESTING PERMIT IS REQUIRED	Bois bande refers to any of three different trees. All three are exploited. The draft second schedule lists <i>Richeria grandis</i> only. <i>Parinari campestris</i> and <i>Roupala montana</i> need to be included as well.
Third Schedule, Protected Areas. Part B Special Conservation Reserves	The Erin Savanna and Mt St Benedict Savannas should be included here. Natural savannas are a critically threatened in Trinidad and should be afforded full protection.
Third Schedule, Protected Areas. Part E Habitat or Species Management Reserves	Other swamps have been excluded. Rousillac, Los Blanquizales, Icacos/Cedros, North Oropouche, Guayaguayare and Brickfield/Carli Bay should be included. For Tobago, the Bon Accord Mangroves & Buccoo Swamp should be included.
Third Schedule. Protected Areas. Part E Habitat or Species Management Reserves	The mudflat at Brickfield/Orange Valley was proposed several years ago to be designated a shorebird sanctuary (see Brickfield Shore Bird Sanctuary). It should be listed as such now. This area is significant for its congregatory waterbirds. Large, regionally important wintering congregations of Laughing Gull (<i>Larus atricilla</i>), Royal Tern (<i>Sterna maxima</i>) and Black Skimmer (<i>Rynchops niger</i>) gather on the mudflats and around the fishing boats and depots. The IBA also supports flocks of transient or over-wintering Neotropical migratory shorebirds numbering between 10,000 and 20,000 birds (predominantly Semipalmated (<i>Calidris pusilla</i>) and Western C. (<i>mauri</i>) sandpipers). Herons and ibises that roost in the mangroves often

	feed on the adjacent mudflats. Regionally important numbers of Brown Pelicans (<i>Pelecanus occidentalis</i>) roost in the mangroves.
Third Schedule. Protected Areas. Part E Habitat or Species Management Reserves	Include the Cat's Hill forests (Moruga) as a habitat reserve. Ocelot and possibly Trinidad Piping-Guan still reside here (both ESS species)
Third Schedule. Protected Areas. Part G Sustainable Use Reserves	Include the Caroni Rice Fields. These fields are an important freshwater feeding site for resident and migrant wading birds and waterfowl. Freshwater environments are threatened in Trinidad and Tobago and should be conserved.
Third Schedule. Protected Areas. Part E Habitat or Species Management Reserves.	The Golden Tree Frog is found on El Cerro del Aripo and Morne Bleu. These sites should be included as El Tucuche has been. (ESS species)
Third Schedule. Protected Areas. Part G Sustainable Use Reserves.	The extensive freshwater marshes and reed beds in the South Oropouche Lagoon (Woodland) should be included. Freshwater environments are threatened in Trinidad and Tobago and should be conserved.
Third Schedule. Protected Areas. Part D Natural Landmarks and Monuments	All mud volcanoes should be included. List available at the GSTT website (www.thegstt.com)
Third Schedule. Protected Areas. Part E Habitat or Species Management Reserves.	All major cave systems should be afforded some protection here. Cave systems are a unique environment which vulnerable to disturbance.
Fourth Schedule. PART A PROTECTED SPECIES OF FAUNA / A1	The lined seedeater (<i>Sporophila lineola</i>) is a migrant seedeater that has been found to regularly visit Trinidad. It should be added to the Fourth Schedule: A1 Critically Endangered Species of Fauna

CRITICALLY ENDANGERED SPECIES OF FAUNA	
Fourth Schedule. B4 NEAR-THREATENED SPECIES OF FLORA	Bois bande refers to any of three different trees. All three are exploited. The draft currently lists <i>Roupala montana</i> only. <i>Parinari campestris</i> and <i>Richeria grandis</i> need to be included to to B4 Near Threatened Species of Fauna.
Fourth Schedule. PART A PROTECTED SPECIES OF FAUNA/A2 ENDANGERED SPECIES OF FAUNA	Freshwater Turtles. The galap (<i>Rhinoclemmys punctularia</i>), the matamata (<i>Chelus fimbriatus</i>), the Gibba turtle (<i>Phrynops gibbus</i>) and Mud Turtle (<i>Kinosternon scorpioides</i>) should be included on A2 ENDANGERED SPECIES OF FAUNA
Fourth Schedule. PART A PROTECTED SPECIES OF FAUNA/A3 VULNERABLE SPECIES OF FAUNA	All bat species other than <i>Desmodus rotundus</i> sould be listed on A3 VULNERABLE SPECIES OF FAUNA
Fifth Schedule. Part A: Partially Protected Species of Fauna	Amphibians should be removed from the Fifth Schedule and placed on the Fourth Schedule: A4 NEAR-THREATENED SPECIES OF FAUNA. What is the rationale for placing them in the Fifth Schedule? Amphibians are threatened globally by chytrid fungus and should be offered as much protection as possible.
Fifth Schedule. Part A: Partially Protected Species of Fauna	Both coral snake species should be identified rather than just list <i>Micrurus</i> spp. They are <i>Micrurus circinalis</i> and <i>Micrurus lemniscatus</i>
Fourth Schedule. PART A PROTECTED SPECIES OF FAUNA / A1 CRITICALLY ENDANGERED SPECIES OF	The following bird species should be part of this section: Trinidad Piping Guan (<i>Pipile pipile</i>) White-tailed Sabrewing (<i>Campylopterus ensipennis</i>) Audobon's Shearwater (<i>Puffinus lherminieri</i>) Masked Duck (<i>Nomonyx dominicus</i>) Scaled Antpitta (<i>Grallaria guatimalensis</i>) Spotted Rail (<i>Pardirallus maculates</i>) Moriche Oriole (<i>Icterus chrysocephalus</i>)

FAUNA	Rufescent Tiger-heron (<i>Tigrisoma lineatum</i>) Blue and Yellow macaw (<i>Ara ararauna</i>) Striped Owl (<i>Pseudoscops clamator</i>) Boat-billed Heron (<i>Cochlearius cochlearius</i>) Chestnut-bellied Seed Finch (<i>Oryzoborus angolensis</i>) Grey Seedeater (<i>Sporophila intermedia</i>) Lesson's Seedeater (<i>Sporophila bouvronides</i>) Lined Seedeater (<i>Sporophila lineola</i>) Wing-barred Seedeater (<i>Sporophila Americana</i>) Yellow-bellied seedeater (<i>Sporophila nigricollis</i>) Large-billed Seedfinch (<i>Oryzoborus crassirostris</i>) Ruddy-breasted seedeater (<i>Sporophila minuta</i>) Slate-coloured Seedeater (<i>Sporophila schistacea</i>) Oilbird (<i>Steatornis caripensis</i>) Golden-rumped Euphonia (<i>Euphonia cyanocephali</i>)
Fourth Schedule. PART A PROTECTED SPECIES OF FAUNA / A2 ENDANGERED SPECIES OF FAUNA	The following bird species should be part of this section: Red-bellied macaw (<i>Orthopsittaca manilata</i>) Pinnated Bittern (<i>Botaurus pinnatus</i>) Least Bittern (<i>Ixobrychus exilis</i>) Stripe-backed Bittern (<i>Ixobrychus involucris</i>) Ornate hawk-Eagle (<i>Spizaetus ornatus</i>) Black Hawk-Eagle (<i>Spizaetus tyrannus</i>) Comb Duck (<i>Sarkidiornis melanotos</i>) White-tailed Goldenthrout (<i>Polytmus guainumbi</i>) Red-billed Tropicbird (<i>Phaethon aethereus</i>) Magnificent Frigatebird (<i>Fregata magnificens</i>) Bearded Bellbird (<i>Procnias averano</i>) Azure Gallinule (<i>Porphyrio flavirostris</i>)
Fourth Schedule. PART A PROTECTED SPECIES OF FAUNA / A3 VULNERABLE SPECIES OF FAUNA	The following bird species should be part of this section: All Ducks (<i>Anatidae</i>) All hawks, Kites and Falcons (<i>Accipitridae</i> & <i>Falconidae</i>) All Owls <i>Strigidae</i> ; Barn Owl, Mottled Owl, Short-eared Owl, Spectacled Owl Sulphury Flycatcher (<i>Tyrannopsis sulphurea</i>) Hook-billed Kite (<i>Chondrohierax uncinatus</i>) Black-bellied Whistling Duck (<i>Dendrocygna autumnalis</i>) White-faced Whistling Duck (<i>Dendrocygna viduata</i>) Fulvous Whistling-Duck (<i>Dendrocygna bicolor</i>) Rufous-vented Chachalaca (<i>Ortalis ruficauda</i>) American Flamingo (<i>Phoenicopterus ruber</i>) Roseate spoonbill (<i>Platalea ajaja</i>) Limpkin (<i>Aramus guarauna</i>) Rufous-necked WoodRail (<i>Aramides axillaris</i>) Yellow-breasted Crake (<i>Porzana flaviventer</i>) Gray-breasted Crake (<i>Laterallus exilis</i>) Laughing Gull (<i>Leucophaeus atricilla</i>) Dickcissel (<i>Spiza Americana</i>) Brown Booby (<i>Sula leucogaster</i>) Red-footed Booby (<i>Sula sula</i>)

	Masked Booby (<i>Sula dactylatra</i>) Trinidad Motmot (<i>Momotus bahamensis</i>)
? Schedule. Closed season for hunting	Declaration of the Close Season for hunting is missing. Under the Conservation of Wildlife Act Ch 67:01, the season is listed in the Fifth Schedule. This declaration should be included.
? Schedule. Invasive species	Invasive Species Register. We suggest a schedule be developed to list invasive species of flora and fauna. This schedule then becomes the basis for prosecuting dealers and other individuals who are caught bringing invasives into the country.
PERMITS	There should be a stated requirement that holders of permits for permitted activities must have the permit in their possession while carrying out the permitted activity.
107 PART XIII. Offences	A minimum dollar value and jail sentence should be prescribed. We suggest a minimum of \$10,000 and/or six months in jail.
107 (1) PART XIII. Offences	A penalty should be imposed for persons who are found in a game sanctuary without a permit to enter the sanctuary
107 (1) PART XIII. Offences	A penalty should be imposed for person(s) who are found hunting without a valid hunting permit during the open season.
107 (1) (s) PART XIII. Offences	Any person who pollutes or causes to be polluted any water in a river, stream, ravine, well, dam, reservoir or other watercourse in a protected area should be fined AND MADE TO COVER THE COST OF REHABILITATION
107 (1) (t) PART XIII. Offences	Any person who harvests, hauls or transports timber from a protected area unless permitted by the Authority or Department and in accordance with the conditions of Protected Area Timber Harvest permit issued to him should be fined AND HAVE THEIR EQUIPMENT AND VEHICLES SIEZED.
107 (1) (pp) PART XIII. Offences	According to the current wording, it would be illegal to plant the seed of any native flora without a permit. This is not in the best interests of reforestation efforts and should be restructured.
107 (1) (u) PART XIII. Offences	A similar treatment for fauna is needed. There is a real threat of animals such as invasive fish and reptiles being introduced.
	ERRORS
107 (2)	Words and numbers of the fine do not match
127 (1) and (2)	Words and numbers of the fine do not match
128 (4)	Words and numbers of the fine do not match
Part C	Spelling of Caroni Swamp National Park
Part A	Spelling of picoplat

	Fauna and Flora Regulations, 2014.
37 (1). Suspension of a permit	A clause should be included whereby a permit can be suspended if there is significant public opposition to the permitted activity.
41 (2). Flora and Fauna Register	The Register should also be made available online, dated, and every effort be made to have it updated regularly.
	Protected Areas and Fires Regulations, 2014
18 (1)	Why allow timber harvesting in a protected area? This provision should be removed
34 (1)	The Register should also be made available online, dated, and every effort be made to have it updated regularly.
	Scientific Research Regulations, 2014.
21 (2)	The Register should also be made available online, dated, and every effort be made to have it updated regularly.
	Protected Area Special Development Permit Regulations.
14 (1)	The Register should also be made available online, dated, and every effort be made to have it updated regularly.