

30th November 2014

Flying-fox Camp Management Policy Review,
PO Box A290, Sydney South, 1232
Via email: flyingfox.policyreview@environment.nsw.gov.au

Re: Draft Flying-fox Camp Management Policy

After reviewing the draft flying fox camp management policy I would like to raise the following concerns and ask that they be taken into consideration when reviewing this document. As the government department in charge of protecting the environment in NSW I believe it is the OEH's responsibility to ensure that the policy protects and minimises the effects of flying fox camps on human settlements while also taking appropriate steps to guarantee the protection and conservation of our native wildlife.

I do not believe that the policy, with its current wording, sufficiently covers aspects of flying fox protection to ensure that any actions taken remain humane, ethical and sustainable. Below I have outlined areas where the policy should be reviewed to strengthen the protection for our native fauna.

- The potential impact of urban development on flying fox camps needs to be taken into further consideration and alternatives should be developed to minimise these effects and allow for flying foxes and humans to cohabitate in safety & harmony.
- Stricter guidelines need to be developed for the management of flying fox camps and foraging habitat areas in the short, medium and long term. These guidelines need to cover areas such as flying fox behaviour, habitat, breeding and nutritional requirements of all species concerned.
- Guidelines should be given to all stakeholders involved to cooperate and work together to develop sustainable plans for the long term conservation and management of flying foxes in their area. These guidelines should include working together to create suitable areas to be developed as alternative camp sites where the impact on human habitation is minimised or creating buffer zones between human developments and existing camps.
- The policy does not give guidelines on how important it is to assess issues relevant to the management of flying foxes and what effects management activities may have on flying foxes and the community. The following areas should be covered to ensure stakeholders can make informed decisions and develop sustainable management plans :
 - The availability of suitable alternative habitat and how many animals could sustainably exist in the identified areas. Dispersal activities carried out in areas where there is no other suitable habitat results in them moving to the nearest food source which is often in areas where they continue to create conflict with their human neighbours.
 - Flying fox loyalty to pre-established camps and the need for ongoing efforts to be made to stop the return of the flying foxes to previously used camps.
 - For each flying fox species behaviour such as breeding cycles, foraging locations, suitable food sources and habitat needs to be outlined to allow interested

stakeholders to develop effective management plans which promote both protection and conservation of the species.

- The potential of stressed animals having an increased risk of disease which may impact both flying foxes and humans.
 - The impact of management actions on the long term conservation of the species and the fact that as native animals it is illegal to harm them.
- According to the policy the appointment of a project coordinator is optional. Stakeholders should be required to appoint a project coordinator to ensure that actions taken are in the best interest of both humans and flying foxes and meet the conditions outlined in the policy.
 - The Camp Management Plan template states that 'further consultation with OEH staff will be required for the trigger for level 3'. The policy does not give guidelines on how to determine when the impact of the camp meets the criteria to trigger level 3 actions or how the OEH will ensure that these criteria have been met. As there is the potential to issue 5 year licences these aspects need to be fully covered.
 - The issue of crop protection is covered in this policy however I believe a separate document should be developed to cover this area as management actions include lethal options. The animal welfare and ethical issues related to the use of lethal methods of crop protection are significant and different to those related to the management of urban camps. The public should be given the opportunity to comment on these issues separately.

In conclusion I would like to say that the entire document does not provide sufficient information to ensure that it meets the objectives as outlined in Section 2 of the policy. I believe further review and modifications need to be made to the policy to meet these objectives. I also believe that due to the welfare and conservation concerns the OEH should get independent advice from organisations such as the NSW Animal Welfare Advisory Council and the RSPCA to ensure that the policy adequately covers these areas.

Yours Sincerely,
A. Cunnington,