

Batwatch Australia

NSW Office of Environment & Heritage
Flying-fox Camp Management Policy Review,
PO Box A290,
Sydney South NSW 1232
By email to: flyingfox.policyreview@environment.nsw.gov.au

1st December 2014

Your reference: NSW Flying fox camp management policy review

Dear Sir or Madam

Batwatch is a Sydney based NGO that monitors for actions that impact animals of the order *Chiroptera* (bats) occur in Australia.

We have an ongoing interest in flying-fox camp management especially where threatened species of flying-foxes are at risk from poorly planned management activities. We are grateful to have the opportunity to comment on the consultation draft of the Flying-fox Camp Management Policy.

The latest draft flying fox camp management policy is intended to replace the 2007 equivalent.

The changes in policy focus between the 2007 flying-fox camp management policy and the 2014 draft are regressive insofar that important species conservation factors, such as the preservation of an effective network of flying-fox camps has been omitted or marginalised. We urge the NSW Government to review the focus of the policy to ensure that the conservation focus of the 2007 policy is maintained.

Where the 2007 policy focused primarily on the core subject of camp management, the 2014 draft makes public health the primary focus on public health. The executive summary indicates that "The overriding purpose of this policy is to minimise health impacts of flying-fox camps" but the body of the document fails to explain how the policy concepts deliver to this priority. NSW Health department and other Australian health agencies have previously acknowledged there is no evidence that living near a flying-fox camp is a risk to human health.

The policy also conflates the issue of shooting as a method of crop protection with camp management which is wholly inappropriate and confusing for a reader who is not familiar with the differences between camp management and orchard protection. The document needs to clearly indicate that shooting in camps will not ever be acceptable as a means of camp management, regardless of the location of the camp.

If the intent of the NSW government is that the document addresses issues that fall outside the scope of camp management, then the document should be retitled appropriately to demonstrate the broader scope. If this course of action is taken, it is important that the issue

of health is presented in a more balanced manner. Subjective references to mental health should be removed.

It would be more appropriate for the document to continue to focus on camp management and provide references/links to the appropriate NSW government resources for the issues of health and shooting as a method of crop protection.

Furthermore, much of the commentary related to flying fox behaviour is unnecessarily negative. For example the suggestion that food shortage may lead to “health risks, nuisance and damage to significant vegetation” omits a more balanced discussion as to the causes and frequency of food shortages, how widespread they are and how many instances of “health risks, nuisance and damage to significant vegetation” can actually be attributed to food shortage. It would be appropriate to provide science based references to support the information in this regard.

In addition to these general comments, we have some specific observations

Location	Text	Comment
Page 6, Section 3, “Level 1 Actions”	Third bullet point	Removal of understorey has implications for camps that may be at risk from heat stress. Understorey will improve local humidity. The policy fails to recognise this
Page 7, Section 3 “Level 3 Actions:”	Second bullet point indicates that “dispersal may result in relocating the animals rather than resolving the issue”	A reader unfamiliar with flying fox management would not understand the implications of this explanation, more detail is required to explain the negative consequences associated with “relocating the animals”
Page 7, Section 3 “Level 3 Actions:”	Text immediately after the first block of bullet points indicates that “Land managers should consider ... working with other flying fox experts”	Engagement with flying fox experts should not be optional, it should be a mandatory requirement
Page 7, Section 3 “Level 3 Actions:”	First bullet point in the second bullet point list	The March-May period is also avoided because it is the mating season, not solely because the young are still dependent.
Page 7, Section 3 “Level 3 Actions:”	Second bullet point in the second bullet point list	How will the land manager determine that the “uncharacteristic” conditions are impacting flying-fox behaviour?
Page 7, Section 3 “Level 3 Actions:”	Fourth bullet point in the second bullet point list	How will the land manager determine that this is a consideration that they must make in the context of their actions

Page 7, "Is shooting of flying-foxes allowed"	Whole section	The second and third paragraphs conflate the issue of camp management and orchard protection. There should be a much clearer separation
Page 11, Section 6 "Adopting a long-term objective to support habitat creation"	Whole section	There is nothing in the policy to support this objective. If the "long term vision of the policy" is to support habitat creation then it should articulate how that objective will be achieved. The policy currently fails to do so. It must be clear that long term planning will not provide habitat in the short term and that the bats will need both roosting and foraging space in the intervening 30 – 50 years if the species is to remain viable.
Page 12, Section 7	First paragraph	Who will determine that a camp management plan is compliant with the template?
Page 12, Section 7		The policy is unclear on monitoring requirements
Page 12, Section 7	Second last paragraph	The policy indicates that a license to disturb may be issued in the absence of a camp management plan if there is an immediate and significant issue. Examples should be provide as to what would be considered to fall within this scope. It should be clear that this is not an acceptable option between the last half of September and March.
Page 14, Section 9	OEH Roles and Responsibilities	OEH R&R should include <ul style="list-style-type: none">- Monitoring camp management activities to ensure compliance with legislation and approvals- Conservation and recovery of the species
Page 15, Section 9	Final paragraph of "Seek assistance from OEH if required" section	Would be more appropriate for the document to reference NSW Health resources as these will offer a more thorough examination of the issue. The casual reader could be lead to believe that the information provided in the camp

		management policy is complete
Page 17, Appendix B	Second last bullet point	Dispersal should also not be undertaken during the breeding season
Page 18 & 19, Appendix C		The case studies included in the Appendices are for relatively simple management actions. It would be preferable for the appendices to include more complex actions such as Maclean, Singleton and Royal Botanic Gardens Sydney

If any of our comments require clarification, please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Nick Edards', with a large, sweeping flourish extending from the end of the signature.

Nick Edards
Batwatch Australia