

Dear Sir or Miss:

I would like to provide comment on your draft policy "NSW Flying-fox Camp Management" and in particular, address the terms in this summary paragraph from your website:

"The Draft Flying-fox Camp Management Policy 2014 (External link) differs from the old 2007 Policy in its focus on minimising the impacts of camps on people; its longer term approach to camp management and streamlining of licensing; and its acknowledgement that camp dispersal may be a successful way to remove impacts on local communities."

* minimising the impacts of camps on people *

Your policy appears to be following the model already established by Qld govt (which is where I have resided for the past 18 years after moving up from Sydney) and Qld's position would be a disastrous policy for NSW to use as a mentor. The Qld govt has:

- deliberately inflamed the public to hate these important animals by grossly over-exaggerating the disease threats and monopolising the media to only produce "negative" bat stories;
- has threatened councils in Qld to do something about initiating bat dispersals even when the local councils have determined that there is no problem with local bat camps;
- has setup a system where councils can do dispersals without permits (unless required by EPBC legislation) and then "looks the other way" while permits and state laws concerning cruelty are ignored
- has created a "mob mentality" within communities who have taken it upon themselves to blindly and ignorantly harrass, injure and kill flying-foxes without any worry of investigation or enforcement from the govt

Flying-foxes are being singled out as "demon of the month" over and above all other wildlife - and this attitude is unacceptable, especially by agencies whose mandate is for the CONSERVATION of wildlife. The disease threats are extraordinarily minimal and yet other animals - such as dogs - that are actually involved in thousands of injuries annually and even deaths to people are completely ignored. What kind of double-standard is that? The fact that you believe you need to create a management policy for flying-foxes on the basis of "community threat" is a complete misnomer when genuine threats to the community are ignored.

* longer term approach to camp management *

How are dispersals a "longer term" approach to mgmt? They are not management at all - they are an attempt to shove the problem outside your field of view without doing anything to actually address or solve the problem. Dispersals do not work. What does work is research and trying to find out WHY the animals have been drawn closer to human habitation. Is it because we have destroyed many of their habitats? Is it because we have poisoned them with agricultural chemicals and then complain when bats suddenly start attracting and shedding viruses when this simply didn't happen prior to 1994? Is it because we have poisoned the atmosphere, thereby causing climate change which is affecting their food supply and the timings of flowerings? Is it because the guaranteed food resources wherever people are located could be giving off pheromone signals to these animals that is attracting them in? Or it is simply because when you have no access to food, there is ALWAYS food and water where people are? (If your family is starving, you will go where the food is.)

What would be a longer-term approach is to identify camps where there is too close an interaction with local residents and then look topographically at creating suitable habitat close by. Such habitat should be adjoining water (larger creeks, lakes, wetlands) and be specially planted up with a combination of roosting tree species, creche tree species and a variety of food trees which will flower at different times of the year. Just shoving them out of their homes with no alternatives doesn't work - if you don't want them to live in Place A, then create a suitable Place B for them to shift to. (It's called co-existence - the same thing that govt expects of farmers when CSG wants to put drills on their land!)

* streamlining of licensing *

NSW govt is obviously an LNP govt if you are talking about streamlining of licensing. Qld has gone this route and it has led to nothing but trouble with harrassment of flying-foxes taking place while govt "looks the other way" while environment groups are being forced to consider legal actions against agencies. This is not conservation and will never be while the public has been deliberately incited by govt into a "mob

mentality". The LAST thing you need in a social climate of "racism" (which is what this prejudicial behaviour against flying-foxes actually is) is less oversight and "streamlining".

* acknowledgement that camp dispersal may be a successful way to remove impacts *

This is perhaps the scariest statement of all in your approach. Dispersals DO NOT WORK and attempts at dispersals show that your environmental agency - which should have a good knowledge of flying-fox biology and ecology by now - obviously knows extremely LITTLE about these animals. There is more than enough evidence from all states where dispersals have been attempted that a huge amount of money has been wasted to scare off a few individuals who are instantly replaced by new individuals who arrive and don't realise that there was a dispersal there already.

These are migratory animals - like migratory birds - who arrive at specific camps which they know the locations of since birth. As individuals move around the state following available food sources, they head to the nearest camp as sunrise nears. (A study into the amazing navigation skills of flying-foxes would be most interesting....) These individuals do not know that there has been a dispersal previously where others of their kind have been harassed and scared off (and frequently injured or killed although at least the Qld govt can't confirm this because they have been "looking the other way").

In FNQ Qld where a very controversial dispersal has been taking place in Cairns, we have been seeing malformed babies this birthing season and abandonment and/or lactation problems have been excessive. The animals only produce one offspring per year and the Cairns CBD camp is one which has been determined by the National Recovery Plan for Spectacled's as "critical for the species existence". The mortality rates of babies from that camp this year is basically a "write-off". Stress will be a key factor in this problem.

Numbers of flying-foxes in the known camps of the region have also been much lower than usual. Additionally, heat incidents last year killed over 100,000 flying-foxes on the east coast (including NSW) and the first of this year's heat incidents has already occurred at Casino. Add onto that the impacts of drought and this recent harassment and "racism" by the public against the taxon (fueled by govt exaggeration and a controlled media) and the result is a massive aggression against this important pollinator. Mortalities are piling up and two of the four species of flying-foxes in Australia are already EPBC listed. When do you decide that all stops must be pulled out to fully protect them - perhaps when they are critically endangered (although by then it will be too late to such a colonial species from extinction)????

We are seeing some very worrying trends up here in Qld that could signal that the flying-fox population is about to crash. If NSW takes the same reckless and un-scientific approach that has been done in Qld, you will be likely to see the same. And the bottom line is that it is YOUR JOB to protect these animals, to properly educate the public as to their importance, to facilitate methods of co-existence with them, and to ensure controls are in place to protect these animals from the ignorant and the intolerant.

If you wish to contact me for further information, my details are below. Thank you for your time and what I hope will be very serious consideration of my comments.

Deborah Pergolotti