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Our Ref: SF430

18 November 2014

Ms Carolyn Davies  
Director Environmental Programs  
Office of Environment & Heritage  
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Dear Ms Davies

### **Submission On Draft Flying Fox Camp Management Policy**

Thank you for your email of 13 November 2014 announcing the release of the Draft Flying Fox Camp Management Policy for consultation until 1 December 2014.

The policy strongly encourages land managers, particularly local councils to prepare Camp Management Plans for sites where there is a high level of impact on a local community.

Nambucca Shire Council considered the Draft Flying Fox Camp Management Policy at its meeting on 13 November 2014.

Nambucca Shire Council agrees that the proposed Policy does have some value in better articulating the required procedures for the management of flying fox camps.

The Draft Policy states that to obtain approval, land managers must submit their plan to OEH who will then guide the application through the necessary process for licencing. The statutory process is set out in a flow chart. The fact that the flow chart contains 21 separate boxes and a continuous loop indicates that the licencing process is far from simple. In fact a critical element is a decision as to whether or not the proposed action is likely to have a significant impact on the species. If it is deemed that it will have a significant impact then a Species Impact Statement is require.

Nambucca Shire Council's experience is that the technical and staffing resources required to prepare a Camp Management Plan will not be met within Council's existing staffing complement or budget. In practice, this will mean that Council will have to employ a consultant to prepare a Camp Management Plan on its behalf. Again from experience Council anticipates that this will be at a significant cost. Further, if the recommended actions are not successful, presumably the Plan of Management would need to be reviewed and then resubmitted under the licencing process.

The Draft Management Policy also flags that there will be conditions and restrictions attached to licences which will result in councils incurring further costs. For example, where dispersal of a camp is proposed there would be additional conditions requiring population counts.

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Whilst Nambucca Shire Council acknowledges the improved policy response provided in the consultation Draft, it is recommended that there be a commitment of funding from the Office of Environment and Heritage towards the preparation of Camp Management Plans by respective land managers. In Council's instance the NSW Treasury Corporation has assessed its financial sustainability as weak with a negative outlook (as per most councils on the North Coast). The Nambucca Valley has at times had three major flying fox camps within or adjacent to urban areas. It is likely that the funding for the preparation of individual Camp Management Plans and obtaining and complying with the licence requirements every five years will be outside the financial capacity of the Council.

It is requested that the Office of Environment and Heritage consider the limited financial capacity of some councils to prepare Camp Management Plans and provide a commitment of funding to those councils to assist in their preparation.

Yours faithfully

**Michael Coulter**  
**GENERAL MANAGER**

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