



North Coast Environment Council Inc.

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Honorary Secretary

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Submission in response to the Flying-Fox Camp Management Policy Consultation Draft 2014

To The Flying-fox Camp Management Policy Review

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Attention The Policy Review team, and

The Hon Rob Stokes MP, NSW Minister for the Environment.

The NSW Flying-fox Camp Management Policy (DECC 2007) was developed through extensive consultation and took into consideration the issues of residents effected and concerned about Flying Fox camps in proximity to their residences while also taking things such as Threatened Species listings and animal welfare into account. The current changes to Flying Fox management as indicated in the 2014 draft document appear to be another example of developing policy on the run, to appease a vocal minority, such as the poorly thought out 10/50 Bushfire regulation. The revised draft policy encourages a return of 'licenses to kill' in rural areas and the generally unsuccessful dispersal of camps which we do not support.

'We are additionally concerned regarding the devolvement of both the state and federal environment ministers responsibilities down to local government level . Protection of a threatened species should be the Ministers' responsibility and not handed to local government agencies under public pressure to act to remove bats from their habitat.

Even disturbance, that sounds benign enough, prevents the Flying-foxes from sleeping in the day time which results in their not having the energy to forage at night. They can travel more than 50km from their camp for that purpose, leaving them exhausted and ultimately dying of hunger.

The draft document appropriately acknowledges that the important role in pollination and seed dispersal of much of our coastal flora is facilitated by Flying Foxes. It is apparent that Flying Foxes are

fundamentally important in maintaining the health of our coastal eucalypt forests. The draft document also rightly acknowledges that the establishment of new flying fox camps close to urban areas may be a direct result of recent flying fox habitat clearing and disturbance in rural areas, in addition to the extensive and continued loss of forest cover over the past century. Unfortunately this disturbance and loss of native forest habitat continues unabated and the displacement of the flying fox populations continues.

NSW Forest Corp continues to devastate swathes of native forests under the misleading claims that they are practicing Ecologically Sustainable Forest Management. We note that the current IFOA Remake will allow even more intensive logging operations which will have even less consideration for threatened species and their habitats.

There are currently some one hundred thousand hectares of NE NSW native forests severely impacted by Bell Miner Associated Dieback (BMAD). Experts believe that this area is increasing at an alarming rate and depriving Flying Foxes of their fundamental food and habitat requirements. BMAD is considered by most experts in forest ecology to be attributed to unmitigated disturbance to our moist eucalypt forests. This leads to weed (lantana) invasion and a serious decline in forest health which through facilitating BMAD leads to total forest ecosystem collapse. Given Forest Corps apparent denial of the seriousness of this problem and failure to do anything about it, it is little wonder that increasingly, flying fox colonies are being displaced.

The situation with the flying fox camp in Casino provides a typical example of the outcome of limited, suitable, riparian habitat available outside the town limits. The Richmond riverbanks both above and below Casino township are at best only sparsely vegetated and largely weed infested leaving little suitable habitat outside the urban area.

Any effective Flying Fox policy needs to look at undertaking extensive revegetation to replace previously lost habitat as well as implementing plans to restore the health of our extensive, degraded coastal eucalypt forests. This should begin immediately through minimising and mitigating forest disturbance and actively addressing the proliferation of understory weeds.

The North Coast Environment Council cannot support acts of cruelty associated with usually ineffective attempts at Flying Fox camp dispersal. We don't support further habitat removal (especially of Endangered Ecological Communities) as a control method, especially given that habitat loss is the primary cause of the current flying fox problem.

The NCEC are vehemently opposed to the issuing licenses to kill flying foxes to orchardists because it is particularly cruel and the government is largely unable to ensure compliance with limitation on numbers killed or protocols associated with culling. Licenses to kill Flying Foxes should not be issued. Rather, orchardists should be encouraged to net their crops, as many already do. This provides protection from other problem animals such as native birds as well as providing hail protection.

We acknowledge that there may be some potential health impacts associated with Flying Fox camps. We understand that *Lyssavirus* is a concern, but one which appears to be highly exaggerated and

that needs addressing by appropriate correct public education, not fear mongering and misinformation. We also understand that the susceptibility of animals to disease may be especially related to increased stress. This increased stress is brought about through habitat removal as well as disturbance through attempts at colony dispersal.

The likelihood of increased temperatures and more frequent heat waves in the near future will likely threaten the species survival as was suggested by the recent deaths of Flying-foxes at Casino. This increased threat should also be factored into the consideration of the need to at least retain protections if not extend them by subsidizing netting in regional areas.

In summary we call on OEH to abandon the cruel and generally ineffective actions to be permitted under the draft 2014 Flying Fox Camp Management policy and revert to the more acceptable 2007 DECC policy.

Yours sincerely,

John Jeayes (Hon. Sec. NCEC)

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