

Stephen J Corbett

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Flying-fox Camp Management Policy Review,
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Re: Draft Flying-fox Camp Management Policy

Please read below my comments in regard to the proposed Flying-fox Camp Management Policy. I have focussed on sections that don't meet the aim of managing flying foxes sustainably or humanely.

- ***Routine Camp Management Actions (Level 1 Actions)***

Level 1 actions could be misused (intentionally or otherwise) to disperse a bat colony or to kill or harm to animals in the colony. The wording of the policy needs to make it clear that "routine camp management actions" don't have the effect of disturbing, distressing or harming flying-foxes. It should be clear that penalties that apply under the existing law will prevail if unauthorised actions are taken.

- ***Creation of Buffers (Level 2 Actions)***

Effectively the same issue applies to this section, where these actions could be misused to disperse, kill or harm bats. For that reason, I believe that the same constraints and warnings should apply to actions taken under this section as suggested above for level 1 actions.

- ***Camp disturbance or dispersal (Level 3 Actions)***

The draft policy "recommends" using a coordinator. A "recommendation" won't be sufficient to satisfy the requirements of this policy (i.e. that the flying-foxes are managed sustainably). Rather, the appointment of an experienced Coordinator should be mandatory.

- ***Camp disturbance or dispersal (Level 3 Actions)***

Similarly the draft policy lists conditions where dispersals are "not recommended". To ensure that there is no doubt that dispersals are not conducted under inherently inhumane conditions it is important that dispersals may not be conducted under those four conditions. I feel very strongly that it is essential for actions endorsed by government agencies to be sustainable and ethical.

- ***Is shooting of flying-foxes allowed?***

I share the view expressed by many others that the shooting of flying foxes is inherently inhumane, and it should be ended as soon as possible. It is indiscriminate, and at the time of year that many crops are 'at risk', flying foxes may have dependent young that will die a slow death from starvation when their mothers are killed.

In closing, I want to say that it is my strong opinion that it is legally and ethically incumbent upon the NSW Government to provide protection for its wildlife, and to have in place policies that prevent animal cruelty and unsustainable behaviour, so I urge you to strengthen the welfare and sustainability issues of the policy as per my suggestions.

Yours faithfully,
Stephen Corbett