

Please find attached my submission for consideration in regards to the draft Flying-fox Camp Management Policy.

I am a management consultant living on the South Coast, and in my spare time I volunteer with the local wildlife group "Wildlife Rescue South Coast". As a consultant I assist government agencies in NSW, Victoria and Western Australia to write and manage policies and plans.

Consequently I was surprised and disappointed to review this draft policy which sets out objectives and then describes policy approaches that will not meet those objectives. It is inconsistent in many places, and offers a number of "optional" suggestions and recommendations which is not only inconsistent with the way other OEH policies are written, but are so weak that they render the policy ineffective as a tool for delivering outcomes that support the stated objectives.

The policy allows for actions which have been demonstrated to be ineffective over many years (and my submission refers to government reports which confirm that claim). What is the point of a policy which supports and recommends actions that have been proven not to work?

The policy allows for the shooting of flying-foxes. The governments of NSW and Queensland have received advice from experts around Australia, including their own agencies and committees that shooting is inherently cruel, unethical, unsustainable and largely ineffective, whereas netting has been shown to be far more effective. Farmers were given 4 years notice that they needed to adopt netting and stop shooting. Many, if not most have now done so. So why is the NSW Government rewarding the minority of orchardists who have ignored the NSW Government requirements, and seen fit to continue a practice that is at once both inhumane and ineffective? It makes no sense.

My submission, unlike the policy, is evidence-based. In my submission I have provided evidence from numerous sources which the OEH and Government should already know about, as many of these were studies and reports previously provided to the NSW Government. However if you require copies of any of the reports or studies mentioned, please contact me.

Regards,  
Steve Amesbury. Tapitallee, NSW