

Draft Flying-fox Camp Management Policy 2014

Submissions Report

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1 Submissions Overview

1.1 Introduction

Public consultation on the draft NSW Flying-fox Camp Management Policy (2014) took place between 3 November 2014 and 1 December 2014. The policy and supporting information were available on the Office of Environment and Heritage (OEH) website and on the NSW Government *Have Your Say* website where the public were invited to respond to consultation questions in an online form or make a written submission by email or post. The consultation questions are contained in Appendix 1 at the end of the report.

This report identifies the main themes in submissions and summarises the comments received under those themes. It does not attempt to report every comment. The information drawn from the submissions will be used by the NSW Government in finalising the policy.

1.2 How many submissions were received?

204 submissions were received. Sixty-seven of these were submitted through the online form in the online consultation portal and 137 written submissions were received via email or as a hard copy.

1.3 How submissions were analysed

Sixteen recurring themes were recognised across the submissions. The content of each submission was analysed and assigned to the 16 themes shown in Table 1. Where submissions raised multiple issues, comments were included in each relevant theme and considered accordingly.

THEME	DESCRIPTION OF CONTENT
Policy foundations and objectives	Comments on underlying intent of draft policy and stated objectives
Health	Comments on way in which draft policy identifies and manages impacts on human health
Amenity	Comments on way in which draft policy identifies and manages impacts on community and individual amenity
Level 1 Actions	Comments on way in which draft policy defines, enables and controls routine management activities on land associated with camps
Level 2 Actions	Comments on way in which draft policy defines, enables and controls actions to create buffers between camps and built areas.
Level 3 Actions	Comments on way in which draft policy defines, enables and controls actions to disperse a camp
Shooting	Comments on way in which draft policy defines, enables and controls shooting of flying-foxes as part of camp management.
Camp management Plans and licensing	Comments on way in which draft policy defines, enables and controls preparation of camp management plans and arrangements for licences
Community education and engagement	Comments on way in which draft policy defines and enables and controls community education and engagement
Welfare	Comments on way in which draft policy identifies and manages animal welfare considerations.
Conservation	Comments on way in which draft policy identifies and manages wildlife protection and threatened species conservation
Planning	Comments on way in which draft policy defines, enables and controls long term conservation planning and use of strategic land use planning in camp management.
Roles and responsibilities	Comments on way in which draft policy defines, enables and controls roles and responsibilities
Case studies	Comments on effectiveness of case studies to explain the issue and the policy approach
Monitoring and evaluation	Comments on way in which draft policy defines, enables and controls monitoring and evaluation.
More information	Comments calling for more information to explain the policy and support implementation.

Table 1: Themes from analysis of public submissions

Each comment was also analysed for the level of support expressed for the policy position or approach. Comments were placed into one of the following categories:

Supportive — those that were supportive of policy position or approach for identified theme.

Neutral — those that were neutral or provided suggestions to strengthen or improve policy position or approach for identified theme.

Critical — those that were critical of policy position or approach for identified theme.

In addition to determining the level of support for each comment under a particular category, the overall level of support for the draft policy was determined (supportive, neutral or critical).

1.4 Who made the submissions?

Submissions were categorised as coming from members of the public, organisations or councils/ local government.

Of the 204 submissions, 160 (78 per cent) submissions were received from individual members of the public, 20 (10 per cent) submissions from councils and 24 (12 per cent) submissions from organisations.

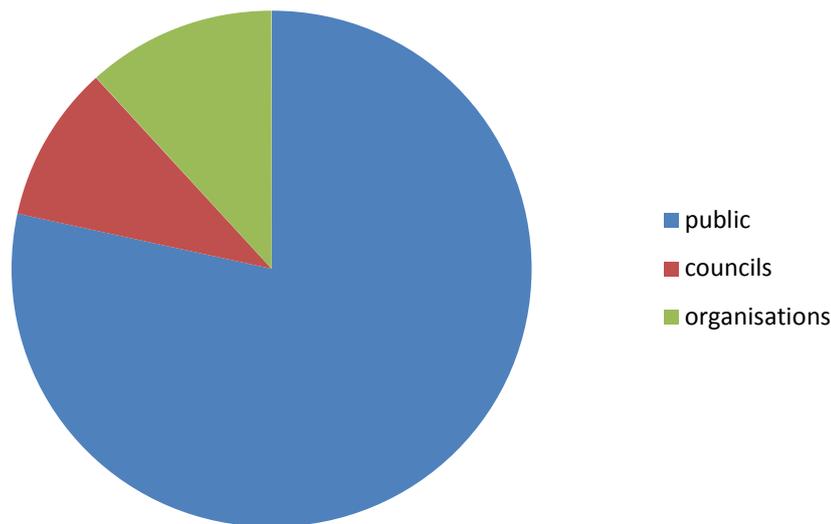


Figure 1: Submissions categorised by type

2 Thematic analysis of public submissions

2.1 Policy foundations and objectives

Approximately a quarter of submissions (57) commented on the overall intent of the policy and the policy objectives.

Three submissions commented positively on the focus on people over animals and welcomed the intent to empower local councils and communities to decide the best outcome.

Fourteen submissions were neutral or put forward a variety of views about the draft policy objectives and intent. These submissions generally supported the intent to reduce impacts on people, to conserve flying-foxes and to balance those outcomes. However support was qualified. Some held reservations about resourcing as the draft policy did not state how local land managers will meet the financial and expertise requirements for camp management. Some neutral submissions broadly supported the policy objectives but rejected that the draft policy would achieve the stated objectives and questioned whether the 2014 draft policy was informed adequately by research and evaluation of the 2007 policy.

Most submissions (40) were critical of the objectives and foundations of the draft policy for a range of reasons. Criticisms included:

- The objectives for active management of camps to address impacts on human health are misplaced as camps are not associated with elevated health risks.
- The objectives lack balance and need to be strengthened in relation to conservation, animal welfare and community education. They are regressive when compared to the 2007 policy.
- The draft policy does not recognise the need for broad scale conservation management and fails to account for cumulative impacts of local decisions.
- The objectives omit continuous improvement of camp management knowledge and practice (adaptive management approaches).
- The policy approach does not achieve the stated objectives and does not correspond to legislative requirements, particularly for threatened species.
- The draft policy is framed in a negative way by focussing on the impacts from flying-fox camps and does not adequately represent the value of flying-foxes to a sustainable environment.

Response:

The objectives are based on advice from NSW Health to accurately reflect the risk of disease from flying-foxes.

2.2 Health

Approximately half (103) of the submissions addressed the issue of human health directly.

Most of these submissions (72) criticised the policy approach to human health. These included submissions from councils, organisations and many individuals. These submissions frequently referred to available studies that conclude the health risk is low, very low or negligible; citing the draft policy itself, OEH website and NSW Health publications. Submissions recognised that while Australian Bat Lyssavirus (ABLV) is a serious disease, risk of exposure is low because direct contact with bats is very rare and an effective post-exposure vaccine is available.

A number of submissions criticised the policy as counter-productive for managing the issues associated with camps as it perpetuates misinformation and contributes to unfounded hysteria. In addition, the draft policy encourages proactive management of camps without clear conditions, and in so doing, it may cause more stressed animals to end up in direct contact with humans, thereby increasing human health risk.

A smaller number of submissions (22) were supportive and expressed heightened concern or fear about the possibility of disease or other health impacts from flying-foxes. These submissions were strongly worded and the majority were by individual community members with direct experience of a camp. Some were frightened that someone might be infected by a deadly disease. Others were concerned at the loss of health lifestyle through intense noise, smell, droppings and discomfort and distress (see section 2.3 Amenity).

Response:

The policy has been amended based on advice from NSW Health to accurately reflect the risk of disease from flying-foxes and to provide the public with access to more detailed information about specific diseases.

2.3 Amenity

Approximately a quarter of submissions (54) discussed impacts on local amenity and lifestyle. This theme was frequently woven into impacts on health among individual public submissions. Organisations and councils discussed amenity impacts as an important issue that is often merged with, but is actually distinct from, health risks.

A number of submissions (20) were supportive of the draft policy, anticipating that dispersal in particular would alleviate the problems of noise, smell and droppings and to reduce perceived health impacts associated with these issues. Most of these submissions were from people with direct experience living or working next to a large camp.

More submissions (31) were critical of the draft policy handling of the issue of impacts on amenity and the link implied, but not substantiated, in the policy between nuisance and health impacts. Criticism related to two aspects:

- The draft policy recommends proactive management of a camp if impacts occur, but omits any way of measuring and assessing impact from noise, odour droppings or health impacts (including mental health).
- The draft policy fails to advocate practical measures that can reduce actual and perceived health and amenity impacts. Submissions mentioned community education and engagement to address misinformation and provide reassurance; reconfiguring outdoor spaces; use of air conditioning; and double glazing of windows.

Response:

The policy has been amended based on advice from NSW Health so that the risk of disease is accurately reflected in the policy. OEH online resources will provide advice to land managers on how to effectively engage the community in regard to flying-fox issues.

2.4 Level 1 Actions

Seventy-nine submissions made specific reference to Level 1 actions. Of these, 68 were critical, 10 positioned neutrally and one supportive.

A large number of the critical submissions noted that routine camp management actions (Level 1 actions) could be misused (intentionally or otherwise) to disperse a flying-fox camp or to kill or harm animals in the camp. These submissions suggested that the wording of the policy needs to make it clear that “routine camp management actions” should be a continuation of prior management and should not have the effect of disturbing, distressing or harming flying-foxes and that it should be clear that penalties that apply under the existing law will prevail if unauthorised actions are taken.

A few submissions noted that Level 1 actions such as trimming of understorey vegetation as a management tool has the potential to harm flying-foxes succumbing to any heat-stress event.

Response:

The policy informs land managers’ compliance with NSW legislation. OEH takes its regulatory and compliance responses seriously.

2.5 Level 2 Actions

Ninety-five submissions made specific reference to Level 2 Actions. Of these, 78 were critical and primarily raised concerns that Level 2 actions could be abused to disperse camps. Seven submissions were generally supportive of Level 2 actions and nine submissions were positioned neutrally with regards to Level 2 actions.

The majority of critical submissions stated that the policy should make it clear that once a permit has been issued to complete a Level 1 or Level 2 action it does not allow land managers to harm, kill or disperse flying-foxes and that the policy should reiterate that it is an offence to harm or kill a flying-fox without approval.

The following comments appeared in individual submissions:

- that the policy should make sure vegetation management does not lead to incremental clearing and loss of camp sites and that clearing should be offset by additional replanting of vegetation.
- that caution should be taken with removing vegetation as it provides important shelter for flying-foxes during heat-stress events.
- habitat removal is not supported (especially of Threatened Ecological Communities) as a control method.

Of the supportive submissions (7), around half specifically supported habitat augmentation in the camp.

Response:

The policy informs land managers' compliance with NSW legislation. OEH takes its regulatory and compliance responses seriously.

2.6 Level 3 Actions

A large number (152) of submissions made specific reference to Level 3 Actions.

Thirty-one submissions used were in favour of dispersals. About a third of these requested that dispersal be done in a way that was not cruel to flying-foxes and allowed them to find other sites to live. The remainder were calling for prompt action to provide relief to impacted communities. About a third were expressed in strong language such as "Get rid of the flying rats", "severe culling", "get rid of the disease ridden bats...", "need to be totally removed", and "ERADICATE these pests".

114 submissions were critical of dispersals, primarily raising concerns regarding the limited effectiveness and significant cost of dispersals, as well as seeking stronger assurances on when dispersals cannot be undertaken. These included councils, organisations and many individual submissions.

Many submissions expressed serious concern that the draft policy promotes camp dispersal as a successful management method and noted that most studies and research on camp dispersal and past attempts to relocate camps has proven that camp dispersal has a very high failure rate. These submissions noted that dispersal should not be promoted to the community as a viable management option as it would raise community expectations and that the community will not be satisfied with anything less than this level of camp management.

Many submissions noted that dispersals should only be undertaken as a last resort and only after all alternatives had been explored.

A large number of critical submissions noted that the policy should be more direct and stipulate, rather than recommend, that disruption and dispersal activity must not be done from the time when the resident female flying-foxes are heavily pregnant until the young can fly independently (generally between August and May). These submissions also noted that disruption and dispersal activity must never be undertaken when daytime temperatures are extremely high or expected to be extremely high (over 37 degrees Celsius). They noted that creating stress for flying-foxes in these conditions would almost certainly result in fatalities for adult and juvenile flying-foxes within the roost.

Some submissions noted there is no description or definition in either the policy or the camp management template as to “what the ‘trigger’ for level 3 might be or what would be considered ‘legally defensible’ actions required to implement a level 3 camp dispersal”. These submissions noted that the policy outlines the challenges and uncertain outcomes arising from dispersal but fails to describe the circumstances or justifications that would trigger such actions.

The following suggestions were included in individual submissions:

- The policy should clarify monitoring requirements for dispersals as provisions in the draft policy were insufficient.
- Monitoring should occur on a seasonal basis at the site and at surrounding camps for at least 12 months after the camp has dispersed.
- More emphasis should be placed on early intervention (i.e. options to manage vegetation or undertake low risk dispersal in the very early phase of new camp establishment), where the site is assessed through standardised risk assessment as an inappropriate location.

Response:

- The policy has been amended to recognise that camp dispersals are frequently not successful (as shown by research).
- Experts from OEH will provide resources and advice, tailored to specific camps, to assist land managers developing camp management plans.
- OEH will implement an adaptive management approach to camp management based on evidence collected as a result of the policy.

2.7 Shooting

Half of all submissions (102) made specific reference to shooting and raised serious concerns with regards to the effectiveness of shooting and associated animal welfare concerns.

Of the 101 critical submissions, a large number expressed that shooting flying-foxes is animal cruelty and supported their points by referring to various studies (e.g. findings of the Flying-fox Licencing Review Panel¹), which found that the animal welfare issues that result from shooting as a method of mitigating crop damage caused by flying-foxes are “unacceptable ethically and legally”.

Some submissions noted that it is inappropriate to include any reference to shooting in orchards in the camp management policy and that the policy should state the NSW Government position categorically (that shooting is not permitted as a form of camp management), to avoid any confusion that may arise.

¹ The former Department of Environment and Climate Change established an independent panel in 2009 to undertake a review of the NSW licencing regime to harm flying-foxes to mitigate commercial crop damage.

Response:

The policy outlines that shooting is not appropriate for managing flying fox camps in towns and urban areas. The Government has committed to a phase out of shooting in orchards by 2020.

2.8 Camp management plans and licensing

Seventy-nine submissions made specific reference to camp management plans and/or licensing issues. Sixty-six submissions were critical spread over council, organisations and members of the public. Twelve submissions were neutral and one submission was supportive.

Many submissions made comments regarding the five year licensing provision and were concerned that the policy is loosely worded and could potentially be used by a land manager within that five year period to manage a situation substantially different to that for which the licence was granted. These submissions suggested that the wording should be tightened to make it clear that the licence applies to a particular situation and a particular location.

Many submissions implied that the policy and the camp management plan template fail to articulate the necessity for a land manager to identify issues that arise from the collateral consequences of these management actions for flying-fox camps in one area, on neighbouring locations. Some submissions stated that the camp management template fails to clarify responsibility for unintended outcomes of dispersals.

Some submissions indicated that camp management plans are onerous and costly and that this would have significant flow-on compliance costs for many councils. Some council submissions questioned what support would be made available for councils to prepare and implement camp management plans. One council submission noted that the policy omits description of the resourcing package to enable councils to fulfil their role. Another council submission noted that lack of OEH resources at a local level would not allow timeframes to be met for certifying within 20 days for Level 1 and 2 camp management plan licences, and 40 days for approvals of Level 3 activities.

Submissions made the following comments about the scope or context of camp management plans:

- It is unclear how the policy applies to camps on private land.
- The draft policy fails to consider the ecological setting and/or the legislative requirements that complicate and/or prevent the initiation of management actions contained in the draft policy (e.g. Coastal Wetlands State Environmental Planning Policy 14 (SEPP 14) listed vegetation communities).
- Camp management plans prepared for single camps are of limited value when compared to regional plans that account for the movement of flying-foxes between sites. The known range and distances travelled by flying-foxes also requires that any management actions must be evaluated for impacts beyond the boundaries of any one local government area.
- Omits management of foraging habitats in the camp management plans.

Other comments were made about the process for camp management plans:

- There is no detail on what parameters should be studied in Figure 1 of the draft policy and what the timeframes are.
- Camp management plans should include how to avoid negative impacts; they should be mandatory; should be prepared in three stages (study, consult, write up).
- It is essential that within the five year period that annual reports of the land

manager's actions or activities are reported to OEH, and these reports must be made publicly available on the OEH website.

- The policy errs with inconsistent stipulations for section 91 licences under the *Threatened Species Conservation Act 1995* and licences under the *National Parks and Wildlife Act 1974*.

Response:

- The policy has been amended to clarify when licences are required under the *National Parks and Wildlife Act 1974* and when a section 91 licence is required under the *Threatened Species Conservation Act 1995*.
- The policy has also been amended to reflect that decisions about camp modification may require consideration of impacts on, for example SEPP 14 wetlands or significant vegetation.
- An amended camp management plan template, detailed resources and expert advice will provide land managers and the community with clearer direction about camp management.

2.9 Community education and engagement

Over a quarter of submissions (60) addressed community education and engagement.

Some submissions (5) were supportive of the approach to education and engagement.

Most submissions (49) were neutral and provided qualified support for the approach to community education and engagement and recommended greater prominence and emphasis on these processes throughout the policy.

Comments covered the following aspects:

- Many submissions explained that education can correct misinformation about the risks posed to the community and increase individual capacity to avoid contact or react appropriately to contact with animals. In this way education can reduce community concern, restore the sense of wellbeing and mitigate people's suffering. Education can help equip people to change their home environment and avoid some of the worst impacts.
- Many submissions recognised the importance of involving the community in planning and managing camps. A number of submissions emphasised that camp management plans should reflect the breadth of opinion in the community and not simply respond to people who are opposed to living with flying-foxes.
- In contrast to this, some felt that community engagement should exclude people who are not impacted by the camp and have no relevant expertise, and they should have no say in the management of the camp.
- Some argued education and engagement should be initiated prior to the preparation of camp management plans and a requirement as an integrated part of implementing Level 1 and Level 2 actions.

Six submissions were critical of the draft policy. They felt the draft policy actually contributed to misinformation and perpetuated false perceptions about flying-foxes and camps and created an expectation and increased pressure on council to pursue predetermined, rather than community generated, camp management.

Response:

Community engagement is recognised as an important component in working with communities dealing with flying-foxes and in implementing the camp management policy.

2.10 Welfare

100 submissions made reference to animal welfare issues. Ninety-seven of these were critical of the policy position taken and the lack of reference to animal welfare concerns. The remaining submissions mainly sought clarification on how animal welfare impacts would be monitored.

Many of the critical submissions noted that if the aim of this policy is to be sustainable, it needs to strengthen areas which offer only optional protection for flying-foxes, and replace them with obligatory conditions. These submissions noted that there is indisputable evidence that shooting flying-foxes is animal cruelty and stated that it is completely unacceptable for the OEH to put into place policies or procedures which are intrinsically unethical.

Many submissions also noted that the policy should clearly indicate that “anyone who causes a flying-fox to suffer pain will be committing an offence under the POCTA (*Prevention of Cruelty to Animals Act 1979*) and may be subject to significant fines if found guilty”. Some of these submissions stated that the NSW Licencing Review Panel concluded (in part) in 2009² that the animal welfare issues that result from shooting as a method of mitigating crop damage caused by flying-foxes are unacceptable ethically and legally.

Response:

Responses to animal welfare impacts will need to be included in a camp management plan and licence applications.

2.11 Conservation

120 submissions made specific reference to conservation related elements of the policy such as the inclusion of habitat creation for flying-foxes and the overall importance of conserving flying-foxes as they are important pollinators. Eighty-nine of these submissions were generally supportive, whereas the remaining submissions (critical and neutral) raised a variety of issues.

The majority of supportive submissions noted the importance of protecting flying-foxes and many of these supported the draft policy provision for habitat creation. Some submissions noted that only long-term approaches such as this – together with widespread use of netting - will provide outcomes that are truly sustainable. These submissions expressed disappointment that these key items are not a more prominent part of the policy and suggested that the Government embed these suggestions into legislation and/or regulations that govern development and land zoning.

Many of the critical and neutral submissions noted that there should be far more emphasis on habitat creation than there is in the current draft policy, and noted the draft policy does not indicate who is responsible for habitat creation, nor how it will be implemented. Some of these submissions sought further clarification on how habitat creation would be achieved in the processes, roles or responsibilities in the policy.

Response:

- The policy has been amended to reflect the importance of supporting habitat creation by moving sections closer to the beginning of the policy.
- OEH will work with experts to provide support to land managers including clear guidance on species choice and locations for habitat creation.

² <http://www.environment.nsw.gov.au/threatenedspecies/Flyingfoxlicrev.htm>

2.12 Planning

Twenty-four submissions specifically mentioned planning related issues. Eighteen of these were critical, two supportive and four were neutral.

The large majority of critical submissions argued for greater emphasis on forward planning controlling development areas near flying-fox camps, and that restrictions need to be formalised in the planning system.

Another submission noted that a strategy be included for the oversight of the state-wide effect of the policy, supported by a framework of conservation indicators as set out in the Draft National Recovery Plan for the Grey-headed Flying-fox.

Response:

The policy has been amended to highlight the importance of recognising historic use of sites in land use planning by moving this section closer to the beginning of the policy.

2.13 Roles and responsibilities

Approximately one third of submissions (65) commented on the way the draft policy allocates roles and responsibilities.

Most submissions (55) were neutral suggesting additions and improvements to the definition of roles and responsibilities. Points included:

- Wildlife carers are often integrated into council and community efforts to manage flying-foxes and camps. This role should be recognised and they must be included in consultative and planning processes.
- Need to clarify who is a “land manager”; that land tenure defines the role of land manager; and that council is only responsible where the camp is exclusively on council land. Other agencies and private land holders must take their share of responsibility for camp management planning and implementation.
- The policy needs to clarify the lead role of Australian and NSW governments on conservation planning, action, monitoring and research.
- Animal welfare roles and responsibilities need to be added.
- The policy should strengthen the requirement for a qualified coordinator for camp management and dispersal in particular, and stipulate the skills needed in order to satisfy the requirements of the policy.

Some submissions were more critical of the allocation of roles and responsibilities. Concerns included:

- The burden and cost of camp planning and management was being pushed unfairly onto poorly resourced regional communities.
- Local land managers may not know enough to recognise the wider context within which the camp management plan is being prepared and the prevailing conditions in the wider environment that may affect their implementation.
- The draft policy fails to clarify who takes responsibility for problems that emerge from animals that are displaced during a dispersal action.

Response:

- The policy has been amended to ensure consistent use of the term land manager throughout the policy.
- OEH will work with councils and other public land managers to clarify roles and responsibilities including the role of key stakeholders.

- The NSW Government is working with the Australian Government to align policy, streamline approvals and clarify roles and responsibilities.

2.14 Case studies

Eleven submissions made specific reference to the two case studies in the draft policy and all of these were critical.

Some submissions noted that the two examples of relocation (Sutherland and Albury) given at the end of the policy document describe events in 2014 – far too recent to be seen as successful examples of relocation. Submissions also noted that a more balanced and realistic approach should be taken with the case studies and that more case studies should be included, including case studies of costly and unsuccessful management actions. The word “relocation” should not be used as it implies the movement of animals to another sited can be predicted and controlled.

One council was opposed to the use of its case study in the policy.

Response:

The two cases studies have been removed from the policy because, even though they were useful in explaining the draft policy, they are not representative of how dispersals always work in practice.

2.15 Monitoring and Evaluation

Twenty-one submissions made specific reference to monitoring and evaluation. Nineteen of these were critical and questioned monitoring provisions and requirements in the draft policy.

Many submissions implied that the draft policy omits satisfactory monitoring and evaluation requirements to support objectives, and some of these submissions noted that it was not clear what the monitoring and evaluation requirements were for camp management plans.

Response:

OEH is developing a monitoring and evaluation program to collect evidence in order to implement an adaptive management approach to camp management.

2.16 More information

Thirty submissions made specific requests for more information to explain policy positions and support implementation. Some of these requested further information on any triggers that would result in the stopping of any dispersal action whilst it is underway. Other submissions stated that in the Dispersal Section the policy seems to assume that the land manager has access to information that they may or may not have.

These submissions argued that more information should be made available:

- for Level 1 and 2 actions - what is allowable/not allowable, timing, and how they can be implemented sustainably
- location of flying-fox camps across the state
- heat stress events
- flying-fox population dynamics.

Response:

Resources are being developed to provide more detailed information about flying-foxes and flying-fox camps for the public and land managers. Resources will be available from the OEH Flying-fox Camp Management Policy web page so that they can be easily located.

3 Appendix 1

Questionnaire



Public exhibition for this draft policy is open until 1 December 2014.

During this period members of the public are invited to comment on the new approach to managing the impacts of Flying-fox camps on communities.

- Make a submission online using the form below
- Email your submission to: flyingfox.policyreview@environment.nsw.gov.au
- Post your written submission to:
Flying-fox Camp management Policy Review
PO Box A290,
Sydney South NSW 1232

What works well in the proposed policy for managing flying-foxes?

What could be improved?

From your experience are there other things that could be included?

Any other comments?