

Comment on Wildlife Rehabilitation Sector Strategy: Public consultation – April 2019

As a citizen who cares deeply about the environment, native fauna and animal welfare and as an experienced wildlife veterinarian, I provide the following comments in relation to the Wildlife Rehabilitation Sector Strategy. The views expressed here are my own and I request my personal details, including my name, remain confidential.

Firstly, I applaud the Office for conducting this long overdue review of the sector. The data collected is an invaluable starting point for refining a process that has historically demonstrated dysfunction that undermines its purpose. I very much hope to see this work expanded in the coming years in order to facilitate the development of an ethical and efficient wildlife rehabilitation process in NSW.

Strategy document:

One of the principles listed on page 8 of the strategy document is: “Wildlife rehabilitation is an important and valuable service that provides benefits to people, the environment and community.” I believe for this principle to be accepted widely by the public, there is a need to justify these claims with evidence. The suggested improvements in data collection are most welcome but must be combined with critical analysis. The sector needs to be prepared to acknowledge that some outcomes will not be favourable and on the back of scientifically evaluated data, there may be a need to recommend significant reform of long-held dogma.

Ethical dilemmas abound in wildlife rehabilitation. There is a need to differentiate between outcomes that are beneficial for an individual animal (ie. those that support good individual animal welfare) and those that are good for a given population or environment. Some outcomes will benefit both, but not all. Oftentimes there is a disconnect between individual welfare and what is good for the environment and as such, I applaud the inclusion of a kit that orientates volunteers to the complex ethics and values of wildlife rehabilitation.

Given the prolonged length of time in care for some species, the understandable emotional attachment created and the unrealistic expectations of some carers, there is a need throughout the rehabilitation process to regularly refocus on the end goal of release back to the wild. The proposed improvements to governance and mentorship should, in theory, help to address this need. Unfortunately it is my experience that some licensed carers as well as unlicensed members of public end up with effectively hoarding situations and/or illegally held pet wildlife as a consequence of these factors. Resources for group leaders and veterinary practices encountering such situations would be a most welcome addition.

In relation to the section on outcomes, there is a strong focus on using examples of good practice. I think there is a genuine need and potentially more to be learned

from understanding where the system has failed in achieving its goals with the accepted framework (individual cases, group governance etc).

It is hoped the goal of increased flexibility will include improved coverage of the entire state. Some regional/rural areas currently have large gaps in services.

Carefully designed post-release monitoring studies must be prioritised and supported. Without this, it will be impossible to evaluate the efficacy of protocols and revised rehabilitation strategies.

I wholeheartedly support the intention to explore the use of central facilities to augment and, in some cases, replace home-based care. I would, however, caution the use of the term 'hospital' or 'clinic' unless the facility is overseen by a veterinarian. Members of public, as well as some rehabilitators, become readily confused by the inappropriate use of these terms – by what services are provided and who can provide them. The Veterinary Practitioners Board of NSW oversees the licencing of animal 'hospitals' (locations where anaesthesia and surgery are performed, which are both Acts of Veterinary Science to be performed only by registered veterinarians).

Accreditation:

Given the requirements are essentially identical to the current scheme, I am not convinced the proposed accreditation scheme will result in achieving the desired objectives without close oversight.

More specifically:

- I don't believe simply having a 'code of ethics' is sufficient, without review of the contents of that code. There should be consistency in codes between groups to avoid conflict and confusion.
- The Council's Code of Ethics link states: "Non-releasable animals which are inappropriate for education, foster-parenting, or captive breeding have a right to euthanasia." I don't think the wording here is clear enough. There should be consistent wording between this and the Code of Practice to avoid confusion.
- The training requirements are not specific enough in my opinion; and documentation of training should be required for all members, not just new ones.
- Is a service capacity requiring response within 1-2 hours realistic for rural/remote areas?
- There should be a requirement to show evidence of meeting data recording standards.

Audit:

Given the methodology of the audit and the fact that participants were selected by their groups, given a prior copy of the audit template and told when the audit would be undertaken, it is not surprising that compliance was found to be high. This is almost certainly an unrealistic perspective of the real level of compliance. Although

this is acknowledged in the audit document, it is not specifically pointed out in the review or the strategy document. I think it is important to highlight that compliance is achievable and necessary to maintain acceptable levels of animal welfare but I worry the statistics presented are misleading and may result in agency complacency in terms of ongoing monitoring. Breaches are commonly identified in practice and increased oversight, inspection frequency and auditing is necessary in my opinion.

Review:

Excluding a proportion of rapidly rescued orphans, most wildlife casualties that arrive into care are severely compromised. Trauma, infection, severe dehydration etc requires prompt assessment and appropriate treatment including provision of responsibly and legally sourced and dosed medications, diagnostic tests and assessment. The fact that the statistics presented in the review suggest that only a small proportion of the total number of wildlife casualties are seen at a veterinary clinic (104,000 rescued each year by rehabilitators, 21000 seen at a veterinary clinic – of which 70% are brought in by members of public), suggests that there is poor compliance with the need to seek appropriate medical advice and care by individual carers and/or care groups. I am hopeful that the proposed training and care group guidelines for liaising with veterinary practices will help address this disparity. Given that private veterinary practices are small businesses, there will be a need to engage the business owners (not just the attending veterinarians) in any proposed reform of policy or recommended practice.

In section 5.4 the comment that “The sector can feel isolated from the veterinary profession and other wildlife specialists and wants the Government to help it keep in touch with advances in animal welfare and conservation biology” is worth highlighting. Improved dissemination of emerging scientific findings has the potential to benefit the rehabilitation-veterinary science sector interface as well as the breadth of services the rehabilitation sector can be actively engaged in.

In Section 3.2 of the Review it mentions that rescues mostly comprise common and widespread species. Given there is mention a couple of times in the document of the importance of the sector in relation to threatened species, I think it would be good to quantify the proportion of rescues that are threatened.

The sector has historically focussed on individual animal rescue and care. I was surprised but encouraged that conservation of the environment is listed as a key motivator for rehabilitators and as a nominated contribution of the sector to the community. This is an opportunity. The sector should be encouraged to focus some of their efforts on amelioration of threatening processes, environmental/habitat protection advocacy etc. alongside the rehabilitation of common species. In section 2.5 highlighting the issue of diminishing release sites and the suggestion that “The sector should explore strategies for..... opportunities for diversifying roles available to new members and aligning itself closer to other non-government land management organisations such as Landcare” both warrant merit.

There is a lack of emphasis in the document of the stark reality that two thirds of animals rescued either die or are euthanised. The impact of this on both rehabilitators and veterinary staff is immense and should not be underestimated.

In section 4.3 (Figure 13, pg 25) I think it is important to point out that euthanasia and the performing of surgery are acts of veterinary science, and as such, it would not be appropriate for these to be covered in any great detail in a nursing specific professional development course.