

Submission Re Wildlife Rehabilitation Sector Strategy

From: Diane Hinton

Comments on NSW Volunteer Wildlife Rehabilitation Sector Strategy

1. Photos used in the document:
 - The photo on page 7 shows a tawny frogmouth being released during daylight hours. I think this is showing an example of poor practice and something that should not be encouraged by this document. Release of nocturnal species should be done at or after dusk. As we (rehabilitators) are encouraged to move toward “best practice” it seems inappropriate to use such a photo and I believe it should be replaced.
 - The photos of a Wallumatta Nature Reserve and South East Forests NP on the first few pages are wonderful photos however NPWS has advised me that we are not licensed to rescue/euthanize in nature reserves or National Parks. My preference would be that you make changes so that we CAN rescue and euthanize in NP and Nature reserves. In the absence of that I believe the photos give a false impression and are misleading to readers and should not be included in the Strategy document.
2. You acknowledge that rehabilitator work provides “a significant public good and is of high value to the community, government and the environment” and also acknowledge that we provide a good service so **please enable us to extend our efforts to rescuing and euthanizing within NP and Nature Reserves and other lands managed by OEH/NPWS.**
3. Please add a clause to the document to the affect that euthanizers must treat animals to be euthanized with respect and not add unnecessarily to its pain and suffering. Included in the clause should be the necessity to also treat non-viable dependent young humanely. For example, pouched young should be humanely removed from the teat or the teat left in the mouth and cut from the mother, there should be no delay in euthanasia after removing the joey from the pouch or if there is to be then the joey must be kept warm and as stress free as possible prior to euthanasia. This request comes from conversations I have had people who have the view that, since the animal is going to be euthanized it “doesn’t matter”. I believe their actions breach animal welfare laws and are unethical and believe including a clause in the document will assist groups to ensure their euthanizers are acting lawfully and ethically.
4. Pg 9 – “Knowledge and Information access”. Please amend the outcome “Better understanding gained of the success of wildlife rehabilitation” to read something like “Better understanding gained of the success of *current* wildlife rehabilitation *release practices*”. I assume this is the desired outcome from the action “post-release monitoring of rehabilitated animals”. While I agree that survival after release is the ultimate test of successful rehabilitation the success rate has to be viewed within what is the expected/normal survival rate of the species in the wild and that is not made clear. Also, the current wording makes it seem that it is the release alone that dictates if the rehabilitation has been successful. In reality each earlier stage of rehabilitation (e.g. rescue and rearing) may be successful but our release method may need improving. To judge the entire rehabilitation process (as it seems is suggested in this Focus Area) by post-release monitoring alone seems limited in its usefulness. The outcomes and actions shown also do not allow for ongoing improvement once we start to get the results from the post-release monitoring. The wording suggests a static state based on a once-off

assessment or our “success” rather than one of continual improvement based on feedback. I am finding this a little difficult to articulate but I hope you can get the gist of what I mean.

5. While having a single contact number throughout the state may make it easier for members of the public and give the sector some economies of scale it will be a bit of a death knell for our group’s fundraising efforts. We rely on people knowing that our group exists, our name, the area we cover, that we are self-funded and that we look after the local area. Sadly we already struggle with generically being labelled WIRES as MOPs have seen the advertisements and assume we are all WIRES. I know of many donations that MOPs have mistakenly directed to WIRES for work Wildcard Queanbeyan Inc has done. One number will make us a homogenous group and be confusing for MOPs wishing to donate. I look to OEH for a solution to this predicament.
6. If a single phone number is used and associated road side signage is erected are we expected to remove our group’s current road signage? While this is not made clear I assume that is the intent. My group has invested substantially in road signage and:
 - a. use it as a means of fundraising by selling advertising space on the sign.
 - b. have signs on remote roads and all over our area just to ensure MOPs know what number to call BUT ALSO to remind them to take the time to call.

I suggest we be allowed to retain our current signage. If necessary OEH could provide us with appropriate sign writing or stickers to change the number on the sign while retaining the group’s name and info OR provide us with new signs and pay for them to be installed in all the locations we currently have signs.

7. Pg 12. Under “Helping new leaders adjust to their role” you say “we will help develop online training resources” but it is not obvious who you will help develop these resources. Are you referring to individual groups or the new Peak Body? Please clarify who you will help develop the on line resources and hence, who is responsible for creating and maintaining the resource
8. Pg 12. Under “Helping new leaders adjust to their role” you say “resources that enhance their skills in leadership, communication, conflict resolution and teamwork”. I think it would be beneficial if you added “governance” and how to apply it to the list.
9. Pg 13 “create a list of trainers endorsed.....and help train new and inexperienced trainers”. It is unclear if: a) the trainers endorsed to deliver speciality species to the sector are our organisations existing trainers or from outside of our organisations but are state/nationally recognised, b) the new and inexperienced trainers then have to be endorsed? If the two categories of trainers are significantly different I think they should be separate dot points to avoid confusion.
10. Pg 14 “Outcomes”. You say “minimum standards of care” and “volunteers need to have skills that meet accepted sector-wide standards of care” but you do not say where these standards are found. Is this the Codes of Practices or is it from elsewhere? I think it would enhance the understanding and readability of the document, and our ability to adopt these standards, if this was clarified.
11. Pg 18 “Outcomes”. You say that “rehabilitation groups operate and pay for their own exclusive phone service” and the flavour of this section seems to suggest (although doesn’t actually say it) that we will no longer need our own phone service once the single wildlife rescue number is introduced. I doubt that will be the case as the staff on the new number will still need to pass on the rescue details to someone within our group and they

will have to ring around to find someone available to do the rescue/euthanize. As it seems unlikely we will be able to do away with our number it would be appropriate to either acknowledge that fact or include details of how the new number will result in us not requiring our own phone service.

12. The document indicates that accreditation will be less work for our groups than licensing has been but does not explain in a simple and straightforward manner how/why that is the case. Please include a simple definition and description of the terms licensing and accreditation and how it will be less work for a group.
13. Pg 20 “accreditation of volunteer wildlife rescue and rehab”. The document says “it will also reduce regulation and provide a more flexible framework for accredited organisations” but after reading the document I am unable to identify how regulation is reduced or how it provides a more flexible framework. I feel somewhat dopey for admitting to this but also feel that if I am missing how this results from the new framework then many others will also feeling the same. I would appreciate some explanation and clarification of why and how this will happen.

Comments on Attachment 2: Transitional accreditation supporting checklist

14. Standard 1. “Is the register of leadership positions and role descriptions available to members”. Asking if it is “available” does not indicate how difficult it might be to get a copy of the information. While I understand the criterion probably can’t say “easily available” I think it would be appropriate to change the wording to assess whether it can be got with appropriate ease.
15. From talking to members from various groups it seems that there is a common issue with members not getting responses to their queries, concerns, complaints etc from Committee. Could you include a criterion to assess this please. E.g.
 - a. Does committee acknowledge receipt of queries, complaints, correspondence from members within 2 days?
 - b. Does the committee respond to queries, complaints etc within ?? days.
16. Standard 2: “Do persons responsible for the euthanasia of animals by firearms hold a current firearms licence etc”. While appropriate licensing is essential I think appropriate animal welfare is also paramount and that another criterion should be included to ascertain if the people euthanizing are trained in rescue (e.g. of dependent young) and in animal welfare to ensure no undue suffering occurs prior to death. Sadly there are times where we must remove an animal from the road prior to euthanasia and this can cause more pain to the animal. Only moving the animal when absolutely necessary should be mandatory as should treating dependent young to be euthanized humanely. No more “ripping” joeys from pouches or walking around prior to euthanizing. Maybe a criterion something like “Have persons responsible for the euthanasia of animals been trained in rescue techniques and animal welfare” might help ensure euthanisers are being trained.
