

Comments on NSW Volunteer Wildlife Rehabilitation Sector Strategy and associated documents

Table 1 - Comments on NSW Volunteer Wildlife Rehabilitation Sector Strategy - consultation draft

Comment No.	Page No.	Document reference	Comment	
01	N/A	General	This document is a really positive step and it's great to see this reform happening. The focus areas, planned actions, and expected outcomes have been well thought out and respond to many of the issues currently faced by volunteer wildlife organisations	
02	N/A	General	A number of interesting and useful statistics have been provided. It would be good to also include the number of current volunteer wildlife organisations/providers in NSW and a list of them. It would also be interesting to know how many of them are currently part of the NWC	
03	1	Foreword	The foreword references ' <i>the sector</i> ' a number of times. It would be good to clarify what ' <i>the sector</i> ' is specifically referring to. Given this is a broad document aimed at general members assumed knowledge should be limited	
04	1	Foreword	The foreword references ' <i>a longer-term program to assist volunteers and strengthen the capacity of the sector to support its volunteers and deliver on-ground services</i> '. Please advise if any details of the longer-term program are currently available.	
05	1	Foreword	The foreword references the <i>2014 Independent Biodiversity Legislation Review Panel review into the biodiversity legislation in NSW</i> . Please advise if this document is currently publically available. If not, please provide this document for reference.	
06	1	Foreword	The foreword references the <i>Biodiversity Conservation Act 2016</i> . Please clarify specifically which requirements of the Act are addressed by the Strategy.	
07	1	Foreword	The foreword references ' <i>the NSW peak body</i> '. Please clarify what this is referring to.	
08	5	Timeline for development of the strategy	The Final Strategy is shown as commencing in June-July 2019, however page 9 shows a table of planned actions which will be ' <i>co-designed and implemented in collaboration with participants in the wildlife rehabilitation sector</i> '(page 8). How are these actions, being the main component of the Strategy, expected to be developed with sufficient consultation by July 2019?	
09	6	Challenges and aspirations	The information provided in succession planning is interesting. There has been a reluctance in some organisations to allow younger members to be involved as the most experienced people are seen as the right/only people to care for certain species. Overcoming this day-to-day bias/hierarchy will be difficult in many organisations.	
10	6	Challenges and aspirations	Sector-wide training standards will be difficult for some volunteers and organisations to accept. Some people and groups have been training and caring for animals a certain way for decades. Development of these standards will require a comprehensive consultation process. I hope that OEH acknowledges that this will be challenging	

11	7	Callout box	<p>Whilst not intentional, it is insensitive to have a tick symbol next to the 64% mental health callout box. There are a substantial number of volunteers who suffer negative mental health effects from their role in wildlife rehabilitation. This can result from stress, overwork, conflict, politics, bullying and harassment, etc. and this impacts on professional relationships, personal relationships, and facilitates bad habits (smoking, alcohol consumption) and general health (insomnia, fatigue, anxiety, depression). One person negatively affected by volunteering is one too many. 36% is nothing to be proud of or seen as positive in any way.</p>	
12	7	Veterinary assistance	<p>It is understood that in general veterinary training must largely revolve around domestic animals. However it is very difficult to work with vets who have limited understanding or experience with native wildlife. It is often the carers who advise medication and dosage rates based on what has been successful in the past. While vets often see wildlife carers in a negative light, the carer may have had that same issue in that same species 20 times before while it is the first time that vet has ever seen that species. Mutual respect needs to go both ways. A degree doesn't necessarily mean they know more or know better when it comes to wildlife. A lot of vets are wonderful, but a lot aren't.</p> <p>During busy periods wildlife can be left in a box at the vet for a number of days before being assessed. No money is made from these animals and they don't have an appointment. This results in significant unnecessary suffering and sometimes results in euthanasia (eg. resulting from untreated infection) or death. There needs to be a standard in place for veterinary care of native wildlife including what is considered best practice. Some personal examples to highlight the issue:</p> <ul style="list-style-type: none"> • I picked up a blue-tongue lizard from a vet that had been there for 3 days. No vet had opened the box let alone assessed it. It had half a head. I drove it straight to my local vet to euthanise • I picked up a corella from a vet that had been there for 11 days. They couldn't work out what was wrong with it so they finally called a wildlife group. I took it home and worked out in the first 5 minutes that it couldn't eat seed (which was all they were feeding it). It starved (almost to death) over a period of 11 days before I crop fed it • I picked up a kookaburra from a vet that had attempted to repair a broken wing. I took it straight to an avian specialist who had to redo the surgery as the original vet had left it in such a bad way that it would never heal properly or be able to fly • I picked up a noisy miner chick from a vet that was cooked from being overheated on a heat mat that was used incorrectly. <p>I have at least 50 similar stories of animals sent from vets to carers with maggots, untreated infection, unidentified injuries etc. I know that most people try to do their best and sometimes things are missed, but vets need to be accountable for this suffering and mistreatment of animals. You will find that carers use specific vets that they know are good with wildlife and develop close relationships with. But we can't control which vet a MOP takes an animal to. I had three different vets I worked closely with, one for possums, one for birds, and one for reptiles and other things</p>	

			such as echidnas. It was common occurrence to take animals straight from other vets to these vets for proper assessment and treatment. All vets need to be brought up to the same standard of wildlife care, or know to pass an animal on to a carer straight away if they are unable to deal with it. An injured animal is better off being evaluated by a carer who will take it to an experienced vet as needed, rather than sitting in a box at the vet surrounded by cats, dogs, lights, and unfamiliar smells.	
13	8	The strategy at a glance	The vision refers to <i>'agreed standards'</i> . What are these and how have they been developed?	
14	8	The strategy at a glance	The vision refers to <i>'natural resource management objectives'</i> . Please advise where these can be found.	
15	8	The strategy at a glance	The principles refer to the Strategy being a living document: <ul style="list-style-type: none"> • How often will the Strategy be reviewed? • How will the effectiveness of the Strategy be assessed? • What mechanisms are in place to ensure continual improvement, including feedback being obtained and used? 	
16	9	Table	The planned actions and expected outcomes in this table should match the information provided on the following pages. For example Volunteer culture and support on page 9 includes <i>"attract younger participants to the sector"</i> as a planned action and <i>"the sector has a positive culture buoyed by the intake of younger participants"</i> as an expected outcome, however these points have been excluded from the information on pages 12 and 13. Is this only included in the table as a token gesture and not seen as a serious consideration?	
17	9	Planned actions	When and how will the proposed planned actions be developed? Will all relevant parties be consulted? The timeframe on page 5 doesn't appear to allow sufficient time for this to be undertaken.	
18	12	Improved standards of governance	Development of resources and a welcome kit are discussed. This is a great initiative and an area that I think is poorly done at present. <ul style="list-style-type: none"> • What resources are being referred to here? • Will the resources and welcome kit be different/ tailored for every group? • What timeframe is expected for this to be completed? • Will each group be provided a contact to work with regarding this? • Will the resources and welcome kit be provided by and paid for by OEH? 	
19	12	Helping new leaders	Online training resources for leadership, communication, and conflict resolution etc are very important, I think this is a great step as the volunteer sector currently has very little/no guidance or support on this front. This should be available to as many members as possible, at minimum all committee members.	
20	12	Unified peak body	<ul style="list-style-type: none"> • Two main bodies are discussed here, please advise what these currently are? • If a single peak body is formed, will all wildlife rehabilitation organisations be required to be part of this peak body? 	

			<ul style="list-style-type: none"> If an advisory board is created, how will it be determined who will be part of this board? Suggest it will be impossible to include representatives from all organisations and how will it be determined who misses out? 	
21	13	Unified peak body, key initiatives	We rely on multiple members presenting training, it can vary from session to session and year to year. While I think resources to help new trainers would be great, I don't see how maintaining a list of endorsed trainers would be feasible. We rely on as many people assisting at training as possible and not all would be on a list held by OEH or the peak body.	
22	13	Unified peak body, fiscal services	It would be ideal to have resources available to assist with financial and reporting requirements. There are complex requirements around reporting to REO, ACNC, ATO, DFT etc. These are often poorly met with treasurers/public officers often having limited or no experience and not being provided with any guidance.	
23	13	Access to funding	With ongoing cuts to government funding how is additional funding for wildlife rehabilitation expected to be accessed or made available?	
24	15	Training for vets and vet nurses	It is stated that \$1.5 million has been allocated to Taronga Zoo/USYD however it is not clear how this money will be used. Will this be to train new vets coming through the education system? Or to train existing staff at Taronga Zoo? Is it likely to make any impact to regional areas or vets that are already practicing? We have a number of vet practices that have supported us for years and would appreciate the opportunity for further training in wildlife management	
25	15	Training for vets and vet nurses	The word 'we' is used regarding collaboration with vet professionals. This is also used earlier in the document. Could you confirm that 'we' is referring to OEH? And if so, what involvement will the wildlife rehabilitation peak body have in this collaboration? Suggest it should be made clear throughout the document who is being referred to in all instances to remove any ambiguity.	
26	15	Updated protocols	I agree that updated protocols are a valuable resource. Suggest the existing protocols should be sent out for comment as soon as possible. Are these currently publicly available?	
27	15	Stronger compliance	Will templates, timeframes, and procedures for audits be developed in consultation with organisations? This will be important as requirements and timeframes need to be achievable and must keep in mind peak seasons for certain species/groups.	
28	17	Data	New approaches to capturing data is much needed, the current system is cumbersome and difficult to maintain. It will be interesting to find out how the data is intended to be validated, I am not sure how this could be completed externally to the organisation	
29	17	Data	An annual report is a nice idea however it would be ideal for organisations to have access to the data itself, to search species trends etc for themselves. Is it proposed for organisations to have access to the data? Even access to view but not edit? I managed the data for one of my organisations for a number of years including entering locations, species, and fates. It is a shame to think it goes to waste or isn't used as well as it could be. The volunteers who put all the hard yards in should have access to this.	
30	17	Connecting volunteers	There is a statement provided about connecting volunteers with scientific and vet networks, but how is this proposed to be done? No information is provided here	

31	17	Post release monitoring	This is great idea, but difficult to implement. Majority of the time it will not be possible to monitor the survival of an animal once it leaves care. I would be interested for this to be investigated for rare or threatened species in particular, or species where we know little about survival rates post-release	
32	18	Single number	<ul style="list-style-type: none"> • There are a number of wildlife organisations that cover the same geographic areas. These individual organisations have spent decades building their own brand. How it is proposed to determine which organisation a call will be forwarded to from the single number? • How will the call forwarding work? Will the initial caller be transferred through? Or will an organisation be advised to call the person back? • Will an organisation still be allowed to keep and promote their own number, particularly those that also operate outside of NSW? • It is stated that a single number will enhance location data, but going through an additional set of hands is more likely to result in inconsistencies and incorrect locations. It is also likely callers will be frustrated at having to repeat information to two separate people. We are more likely to lose rescues this way and for people to hang up and not call again in future • Suggest the proposal of having a single number will require extensive consultation with all organisations prior to implementation. More information will need to be provided on how this is proposed to operate 	
33	20	Outcomes	Review of existing policy and procedures is mentioned here. Will organisations be consulted regarding these reviews?	
34	20	Accreditation	The BC Act is referenced here. Please provide details of the clauses which specifically apply to wildlife rescue and rehabilitation services and clarify which requirements of the Act are addressed by the Strategy	
35	20	Accreditation	The six categories, and the Strategy in general, are largely focussed around wildlife rehabilitation. As per the BC Act, wildlife rescue is also included and should form an integral part of the strategy and accreditation process. This important component appears to have been largely overlooked, with much of the section referencing rehabilitation and rehabilitators. Suggest the sector should be titled the Wildlife Rescue and Rehabilitation Sector and that rescue is more thoroughly integrated throughout the documents. Almost every animal is rescued, less than half are rehabilitated.	
36	21	Accreditation	A transitional approach is mentioned here however no advice on timeframes is provided. When will we be required to apply for accreditation? Will licences continue to be issued in the meantime to ensure services aren't impacted? More information on this is requested	
37	22	Ongoing support	This is the first instance where insurance is mentioned. Can you confirm that organisations and their members will continue to be fully insured under the existing/new peak body?	
38	22	Ongoing support	Suggest there should be an additional point here for continuing to liaise with wildlife organisations throughout the process to provide regular updates and opportunities to review documentation	

			and provide feedback	
39	23	Implementation	It is stated that workshops will be held with volunteers. It would be good to be provided confidence that all wildlife organisations will be invited to attend these workshops and that they are all seen as key stakeholders	

Table 2 - Comments on Accreditation of volunteer wildlife rescue and rehabilitation service providers in NSW

Comment No.	Page No.	Document reference	Comment
01	1	Introduction	While the document title refers to wildlife rescue and rehabilitation, the introduction specifies wildlife rehabilitation only and refers specifically to the wildlife rehabilitation sector. As per the BC Act, wildlife rescue is also included and should form an integral part of the strategy and accreditation process. The rescue component appears to be largely overlooked in this document and the Strategy. Suggest that rescue is more thoroughly integrated throughout the documents. Almost every animal is rescued, less than half are rehabilitated
02	1	Benefits of accreditation	The first sentence here states ' <i>Accreditation will give greater certainty to government and the community that services across the sector are being delivered in accordance with established standards</i> '. This statement is inaccurate. Services could be delivered to established standards under the current licencing system also. The issue here is the lack of sector-wide standards, not the licencing or accreditation system. This statement should be justified.
03	2	Framework for accreditation	I have serious concerns about the addition of the ability to harm, liberate, or possess animals to mitigate property damage or protect human safety. There will need to be strict guidelines regarding the relocation of these animals which should be done within a close radius of where they are captured. How is it proposed to capture or relocate a magpie to protect human safety? Is it considered acceptable by OEH to leave the magpie chicks to starve to death in the nest? There will need to be a specific list of every species this applies to and appropriate actions that can be undertaken for each species. Will this allow the shooting of flying-foxes? Kangaroos? Collapsing of Wombat burrows? OEH will also have to redefine its definition of harm or use another term. 'Harm' currently applies to sick, injured, or orphaned animals, none of which apply to animals being relocated for human comfort. This issue should be extensively consulted on.
04	2	Framework for accreditation	More information should be provided here on the savings provisions of the Act. There is little point mentioning this when no information is provided. Please provide the specific reference to applicable clauses.
05	2	Framework for accreditation	Will each organisation be provided the draft conditions and afforded the opportunity to comment on them?
06	2	Requirement for accreditation	How is it determined which member holds an 'authority'? Does that apply to all financial members? Or only those trained in wildlife rescue/rehabilitation?
07	2	Obtaining accreditation	Accreditation standards and criteria are mentioned here. What are these and will organisations have the opportunity to comment on these?
08	3	Obtaining accreditation	It is respectful to existing providers that OEH will not accept EOI's for new providers in areas already serviced by an existing group. This is a positive step and the show of good faith is appreciated
09	3	Unsuccessful	Could information be provided on the timing regarding unsuccessful applications, and

		applications	suspended/cancelled accreditations? If an existing organisation has their application denied or their accreditation suspended/cancelled, are they still able to operate in the period of amending their application or appealing the decision to suspend/cancel?	
10	3	Implementation of accreditation	A transitional approach to accreditation is mentioned here however little information is provided. Please provide reference to relevant parts of the legislation where this process is detailed.	
11	4	Implementation of accreditation	This section is difficult to understand. The terms 'accreditation standards and criteria', 'transitional accreditation requirements' and 'criteria and evidence requirements' appear to be used interchangeably. Suggest one naming convention is adopted and referenced throughout the document to avoid unnecessary confusion. Attachment 1 refers to 'Transitional accreditation standards and assessment criteria,' I suggest this terminology is used throughout the document when referencing these	
12	5	Introduction	The terms 'wildlife rehabilitation provider', 'wildlife rehabilitation group' and 'independent wildlife rehabilitator' are all referenced here but there is no reference to wildlife rescue as per the BC Act. Suggest this should be updated throughout all documents to state 'wildlife rescue and rehabilitation group' and 'wildlife rescue and rehabilitation sector'	
13	5	Governance, standard	This section mentions principles however it is not clear what these are or where they come from. Please provide these or a reference to where they can be found	
14	5	Criteria in general	These don't match what is provided in the table in attachment 2. It would be helpful for organisations trying to use this checklist if the same terminology and same order is used	
15	6	Criteria 6	This point references 'OEH regulatory requirements for the conduct of these activities'. What are these and where can they be found?	
16	7	Criteria 4	This is not feasible/achievable. Most organisations have such limited support and barely have the resources to rescue/care for the required number of animals. There would be no way to monitor each member, this is not something volunteer organisations could do. If it forms some sort of external or OEH audit that would be great. But volunteers who are struggling to cope with demand can't be expected to have the time to check on the compliance of hundreds of other members	