

Telephone: [REDACTED]

2 April 2019

Wildlife Rehabilitation Sector Strategy  
National Parks and Wildlife Service  
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## **NSW Volunteer Wildlife Rehabilitation Sector Strategy - comment**

### **Introduction**

I am impressed with the content and presentation of the NSW Volunteer Wildlife Rehabilitation Sector Strategy and the three supporting documents. Clearly a great deal of hard work has gone into the analysis of the volunteer wildlife sector with a view to making it more effective.

There is a great deal of information to absorb, but the overriding impression is that yet more bureaucratic measures are to be introduced that add to the administrative burden of wildlife group volunteers and not reduce it. In my experience (an ex NWC member, President and Secretary of Wildcare Queanbeyan Inc.), wildlife groups, including WIRES branches, remain fragile. I feel that OEH has not discovered the capacity of the average wildlife group, or WIRES branch, to adopt and fully implement what have become a detailed and growing number of rules and regulations. OEH claims it wishes to reduce red tape, but this is not apparent.

I have the following comments on the draft Strategy, which I hope OEH will consider.

### **Challenges and aspirations (p6)**

I note that under Challenges and aspirations, it does not include any requirement for OEH to seek ongoing funding from the government to support wildlife group operations. The adage that one merely needs to rely on current funding opportunities, from limited grant offers, has proved to be difficult to access in the past and this situation is not expected to change. Significant, direct government funding is required taking into account the contribution made by the volunteer wildlife sector.

The aspiration espoused by the OEH strategy seems to maintain the status quo, but with added layers of administration. Perhaps the aspiration that might be adopted should be similar to that of other government supported volunteer-based organisations, such as the Rural Fire Service. The RFS has paid staff at its headquarters (perhaps akin to the NWC?); in the four RFS regions (equivalent to the eight NPWS regions); and at district level. Additionally, the government provides clothing, equipment and the cost of operations. A model based on the RFS might be pursued rather than simply rely on the goodwill of volunteers to muddle through.

## **Volunteer support and culture (p12)**

It is disappointing that OEH has not taken the opportunity to markedly reduce the administrative burden that has developed over recent years. There are too many do's and don't. Wildlife rescue, rehabilitation and release is essentially a simple exercise and yet we have in place complex and detailed government rules and regulations, including a restrictive NPWS Rehabilitation of Protected Fauna Policy; a detailed Licence; and several Codes of Practice. Now it would appear a layer of accreditation and the adoption of the National Standards for Volunteer Involvement, is to be added.

As stated, it is important to improve the standards of governance, but there are difficulties. Whilst there may be 5,600 volunteers across NSW, only a small minority of people make themselves available for managerial and administrative positions; or to rescue and care for all type of species. Many volunteers specialise in singular species in terms of rescue and care, or carry out specific tasks, such as to euthanise (shooters), or act in the capacity of snake handler who simply relocate venomous snakes. Those volunteers, who take on an administrative job, often lack the knowledge and experience to succeed. Providing online training may help, but part time volunteers who have families and work commitments may find it difficult to commit more time in gaining the optimum skills needed that are being dictated.

In the supporting documents, OEH has reflected on the positive nature of the wildlife rehabilitation sector, but the imposition of yet more administration, without rationalising what is already in place, and without any financial and material support from government, may be counterproductive. I urge OEH to adopt the mantra, "less is more" and take this opportunity to simplify the totality of the administrative burden, which is increasingly difficult to cope with by part time volunteer administrators – and identify the financial and material support that is needed.

I agree the need for a single peak body, which is much more focussed on strategic outcomes and with an ability to communicate and influence government at Ministerial level. However, most of the key initiatives selected (p 13), are issues that OEH should be managing, in conjunction with regional NPWS offices.

As identified by OEH, the NSW government benefits greatly from what is a 'free' community service, provided by volunteer wildlife carers. Except for WIRES headquarters, there are no paid staff and volunteers are frustrated with the amount of effort needed to raise funds to make ends meet. The current government-sourced financial support provided to the NWC and a few wildlife groups, is frankly a paltry amount, given the identified benefit provided to government. I suggest OEH has understated the impact that volunteer wildlife groups have had in supporting the government's desire to be seen to be coping with injured and orphaned wildlife. In the 21<sup>st</sup> Century, there is a need for a better, fairer, approach with perhaps a significantly different management structure with dedicated paid administrative staff in key positions, and the provision of operational funding.

It is suggested OEH more accurately quantify the contribution made to government and seek a permanent allocation of funding to help cover wildlife group operational cost. Given the parameters for access to the Environmental Trust, funding from this

source is difficult to access, as are many of the other grant opportunities that are available.

### **Standards of care and training (p14)**

I agree training needs to be consistent and standardised. But in doing so, care is needed to not over train. Given the results of by the individual licence holder audit, perhaps there is no need to refresh every three years if one is active and routinely gaining experience on the job. Keeping up to date with any changes to rehabilitation can be done, as an ongoing requirement. As pointed out in the Strategy, not all training needs to be done face to face or, in my view, on a three-yearly basis.

With regard to accreditation and training, perhaps OEH and NPWS could provide optimum competency-based syllabi, with learning outcomes, and course material etc., for use by wildlife group volunteer trainers. This would provide a consistent approach across the sector and allow acceptance of common training.

By the way, there is already one training course that has been accredited, which is the NSW Firearms Safety Brief for wildlife volunteers. This was developed with the NSW Police and agreed by them. It needs updating to a contemporary standard.

Given the tyranny of distance, compliance cannot be achieved by an individual species (or firearms) coordinator. As intimated in the strategy, compliance may best be achieved by encouraging a team approach, with a number of mentors and buddies in different locations coordinating activities. However, I note OEH wishes to introduce yet more training requirements for mentoring volunteers, which may not be necessary and difficult to comply with.

In promoting stronger compliance, one must be sure that this is necessary. OEH has just undertaken an audit and found that the glass is half full, not half empty. To introduce a strict policing regime will be counterproductive. It would be much better to encourage and empower volunteers to follow correct procedures with mentoring quietly overseeing what is happening. Certainly audits are useful, but some care is needed.

### **Knowledge and information access (p16)**

It is not known why OEH wishes to collect so much data. As far as I am aware, OEH has yet to use the statistical returns that have been painstakingly provided over the last few years.

Whatever data collection service OEH introduces, there will be many volunteers who are not computer literate and will have differing levels of enthusiasm to provide the information needed. OEH needs to be very clear, as to what essential information is needed and for what purpose.

### **Community awareness and recognition (p 18)**

It is claimed that having a single wildlife rescue number across the state will help, "increase community recognition of the services provided" and avoid confusion as to who to call in a particular location. This may be the case in operating areas where

there is little or no ongoing media promotion of a wildlife group's activities, however, depending on how the calls will be processed, such a measure may be detrimental to the ability of a wildlife group to engage with its regional community and continue to maintain a trusting relationship.

Some of the confusion has arisen because of the overlapping nature of many of the wildlife group operating areas – a matter that has been raised with OEH previously.

OEH appears unaware that some wildlife groups are already “promoting awareness about volunteer participation in wildlife rehabilitation” and do provide community education via the media and at meetings. If OEH were able to provide additional material to help improve community awareness, then that would be good.

### **Government support and regulation (p 20)**

As mentioned above, I agree that a move towards an accredited-based system is worthwhile, but only if the implementation is appropriate and can be implemented without lowering the enthusiasm and good will that volunteers currently have. Auditing 51 selected carers, out of 5,600 volunteers, will not identify the key problem areas. And if a Finding of the audit is there is a high success rate within wildlife groups, perhaps the quantum of rules and regulations (the administrative burden) can be reduced.

It is odd that wildlife groups will be asked to seek accreditation every three years. I understand the norm in industry, the professions and trades, for accreditation to be granted at the outset and then organisations or individuals would apply for a licence. Accreditation would be removed, or restricted, if, say, an audit indicated a wildlife group, or person, had acted irresponsibly. A licence of course could have conditions applied to it.

As discussed above, OEH plans for ongoing strategic support, ignore the very real need for the NSW government to start to contribute meaningfully to help pay for some of wildlife group operational costs. To think wildlife groups can readily obtain funds “from government, non government and corporate environmental funding streams” shows a level of ignorance of the difficulties encountered. Many grant schemes do not help with operational funding. More support from government is needed, and warranted. Wildlife group volunteers exist because the government cannot otherwise cope in dealing with injured and orphaned wildlife. If OEH wants to add to its partnership in delivering wildlife rescue and rehabilitation services, then it would be good if a convincing case could be put before the relevant Minister(s) for their consideration. I appreciate this may be a challenge.

I note the supporting reports and the strategy have largely ignored the significant contribution made by snake handler volunteers, who remove venomous snakes from people's houses, backyards and sheds in both rural and urban areas; and the euthanasia service provided by qualified Animal Welfare firearms operatives (shooters). Both these activities mean that other government agencies, such as NPWS, (which now has a much reduced capability) and the Police, can focus on higher priority tasks. This is a significant contribution to government. Note that the RSPCA has little capability to help in this regard.

I don't believe the supporting studies have included the work done in supporting rural communities during and after major emergencies, particularly bushfire. In 2017, Wildcare was very active in supporting the communities of Mt Fairy, Sutton and Carwoola, which experienced major bushfire damage. Wildcare Queanbeyan Inc. assisted these communities at considerable expense and in addition to the normal demands. I suggest this type of activity needs to be quantified to further support a case for permanent funding to cover operational costs during normal operations and in the event of an emergency.

For your consideration.

Yours sincerely



Philip Machin