

Commentary by Sentient on the draft NSW Volunteer Wildlife Rehabilitation Sector Strategy

Sentient supports the development of a Wildlife Rehabilitation Sector Strategy by the Office of Environment and Heritage in consultation with participants in the sector. We believe there is a clear need for consistency and evidence-based standards in the rescue, care and rehabilitation of native animals, which is best achieved through an accreditation system, providing this is sufficiently supported by the NSW government.

Overall, this appears to be a beneficial strategy for the future of NSW Volunteer Wildlife Rehabilitation. The five focus areas (volunteer support & culture, standards of care and training, knowledge and information access, community awareness and recognition and government support and regulation) cover key concerns in the wildlife rehabilitation sector. However, a gap in the strategy is that there are few if any animal centred goals outlined and the strategy would benefit from adding these where appropriate.

Statistics – Recommend that the statistics from surveys/stakeholder engagement be disclosed and written up in full, including methods, results and discussion of those results in the context of related literature Eg. <https://onlinelibrary.wiley.com/doi/abs/10.1111/avj.12765>

Vision - Clear and commendable vision.

Principles – Conservation and animal welfare should be included as key principles.

Standards of care and training – Monitoring animal welfare outcomes should be included under Planned Actions, with improved animal welfare outcomes also included under Expected Outcomes.

Knowledge and information access – One of the expected outcomes should be better traceability of individual animals and accountability for animal outcomes.

Lack of funds – This was identified as a key gap so should be included as a focus area. For example, providing wildlife rehabilitation groups with access to organisations that can help them seek & leverage funding opportunities.

Advisory Board or Peak Body – This will require its own governance and operations plans. Who will be responsible for that? Who will provide the resources for that? Will it be independent of the Department and the government?

Standard training for volunteers – We strongly support this, but need to consider who will pay for this and who will provide it?

Updated triage and treatment protocols – “A platform that can be shared by all wildlife rehabilitation providers” is ideal, but what will such a system cost to develop, roll out and maintain? Is this confined to the 'annual report' mentioned or is the intention to establish a database?

Promoting stronger compliance – In terms of ensuring good animal welfare, it would be very



valuable to have "standard templates for doing internal compliance audits against codes of practice" and also to have "random inspections" by the regulator. However, in respect to the "random inspections" in reality how many inspectors are there in NSW & given that the survey results indicate "5600 volunteer fauna rehabilitators in NSW" how feasible and effective would such random inspections be?

A single wildlife rescue number – This is a very valuable initiative for members of the public to report or ask questions about wildlife rescue and care. The Wildcare Helpline in WA (staffed by wildlife rehabilitation volunteers) is an example of how this can work well. However, will require the maintenance of an up to date service directory to ensure people are being directed to the nearest appropriate rehabilitator.

Government regulation and support – We support the OEH's proposed accreditation system, which will encompass more than 'just a license' but will also examine governance, training and support, standards of animal care, service capacity, record keeping, and veterinary services'. While this sounds like an ideal framework, how will it be applied in practice? To individual rehabilitators? Via specific organisations? What about individual citizens who rescue wildlife but are not members of any organisation (and may not always have licenses, permits, appropriate facilities or undertake training or ongoing learning)? What will their obligations be if they are not associated with an accredited rehabilitator? How will wildlife organisations cope with the additional burden if they are required to perform audits of all their carers and provide compliance reports to the Department?

A more flexible policy framework – The proposal to: "Reduce red tape and enable groups to transport animals interstate for treatment and rehabilitation without the need for additional approvals" could have potential risks that would have to be carefully managed and mitigated eg. via traceability and monitoring systems.

Thank you for the opportunity to comment on this draft strategic plan and please feel free to contact us for further consultation.

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