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Page | 1

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## NSW Volunteer Wildlife Rehabilitation Sector Strategy

Introduction to the Consultation Draft *“The volunteer wildlife rehabilitation sector provides an invaluable service to the community that should be better appreciated, coordinated and supported to ensure it can meet future demands and expectations”*.

The sentiment expressed in that introductory paragraph is one that must meet with agreement from the large cohort of wildlife rescuers and rehabilitators volunteering in the state of New South Wales. Such recognition has been a very long time in coming.

We would like to thank the OEH NSW National Parks and Wildlife Service personnel who participated in the development of the Strategy and for their striving to come up with recommendations and actions to unify and improve the sector and work towards reaching 21<sup>st</sup> Century standards in all facets of operations. Long delays in approvals and subsequent publication has lost momentum and caused disillusionment in the sector about the importance of the process. We know the process has brought its challenges and frustrations to all stakeholders but we are trying to remain optimistic that the extra layer of work required by already overworked volunteers will pay off with a workable improved and more cohesive sector.

Now there are grave fears whether the post-Election announcement of the subsuming of the Office of Environment and Heritage into a “super-agency” will result in the Strategy and its introductory statement being just token words in reality. What is the agency that will now be resourced to carry out the many actions to meet the Strategy’s challenges and aspirations? Will those who have worked so hard and well to bring the Strategy to this stage be allowed to continue as a team?

It is quite ironical that FAWNA is in the process of amending for members’ approval its Policy and Procedures documentation to include the name Office of Environment and Heritage in lieu of Department of Environment Climate Change and Water. We will now look to substitute a naming protocol that will weather further Responsible Government Agency name changes.

Looking at the Strategy focus areas we see that there are actions that have been prioritised by OEH and while commendable, to bring them to realisation will require a level of input from volunteers over a time frame that might be difficult to achieve. We do not believe there is full appreciation of the demands and difficulties faced by poorly-funded and time-strapped volunteers to run their organisations, administer the core activities, train their members, fundraise, and carry out all the ancillary day to day activities to meet objectives and produce good outcomes. Each added task, particularly those tasks imposed by outside agencies, brings its own stresses and stressors and

unless you wear those shoes it is impossible to understand the daily constraints wildlife volunteers of all persuasions face. We smile politely when we are invited to have a good weekend – as if that is two days off work in this 7 day a week business.

Wildlife volunteers are there not only because they have the personal commitment to help injured and orphaned native animals, but that the majority of private citizens out there in the community have the expectation that someone will be there to provide good animal welfare outcomes for native animals that need help. Government knows it cannot possibly provide that resource and has therefore devolved the responsibility to volunteer groups with little practical or financial support or wherewithal to produce the quite remarkable outcomes the rehabilitation sector achieves. Every time a rule, impost or best practice guideline is thought up by a desk-bound bureaucrat, we hope the impact on those volunteers who give of their time, their money and their kindness to achieve good outcomes is understood. The rule makers must never lose touch with the empowering introduction statement in the Strategy.

**Improved standards of governance.** We note that it is the intention to work with the sector to adopt Volunteering Australia's National Standards for Volunteer involvement (NSVI) – **Comment:** while this is a lofty aim for organisations with paid personnel and that utilise volunteers, the NSVI itself states:

*Quote: "The National Standards are primarily for the use of organisations that include volunteers in their personnel. They are not intended to apply to the activities of volunteers themselves. Organisations that do not have any paid employees, or groups of volunteers coming together to organise their own activities, may find the National Standards useful for guiding some of their work, or for working towards a more formal organisational structure, **but it is not intended that volunteer groups meet the National Standards.**" end quote.*

To expect totally volunteer groups to adopt this national standard is not, as stated in the standard, the intention of the standard, and would be unnecessarily cumbersome and beyond most volunteer groups' ability to adopt. Further in FAWNA's view this aim will cause much angst among the totally volunteer groups struggling to meet their own objects due to the level of government controls over their day to day business of rescuing and rehabilitating injured and orphaned wildlife, and to meet their licence obligations. For government to offer and fund appropriate governance resource documentation and assistance with the adoption processes is the way to go. Consistent and appropriate material, perhaps shared from existing good-practice groups, is the best way to ensure compliance and help groups improve their management systems and structures. There is no need to reinvent the wheel. There is a lot of good stuff out there – it needs to be evaluated, "ticked" off, adapted where needed and shared.

A **Welcome Kit** for new volunteers will be a positive.

**Helping new leaders adjust to their role.** On-line training resources have been looked upon with some scepticism. A good organisation policy framework should obviate the need for such training. Time spent in recruitment, community and member training and fundraising are regarded as more important priorities for volunteers to ensure their groups prosper.

A **unified peak body** is vital for the sector into the future. A condition of the accreditation application process should be that membership of the NSW Wildlife Council is required by all groups and individuals. Those groups and individuals should have a representational voting right that reflects either an area or an active volunteer number representation. An Advisory Board might be a welcome concomitant on matters affecting but not directly related to the day to day operation of rehabilitation groups.

The dot point key initiatives listed under the partnership statement with the newly configured peak body (P13) are mostly supported but caution needs to be taken that any future mandatory trainer endorsements do not exclude existing successful trainers. Many have said they will “walk away” if onerous standards and accreditation as trainers are imposed upon them. There is a marvellous resource out there that must not be lost.

The suggestion of **augmenting home-based care** with enclosures built by wildlife rehabilitation providers on government or corporate owned land should also be treated with great caution due to the need for direct supervision and regular monitoring. FAWNA (NSW) Inc has one release flying-fox aviary on land owned by a Local Government Agency with very tight security on the border but problems have ensued from the occasional unwelcome visitor (both human and animal) to the perimeter.

The **wildlife rehabilitator of the year award** idea has great merit and is something FAWNA does annually, recognising one member, chosen by their peers, for outstanding achievement. It is actually a memorial to the Late Bryce Laut, who was a National Parks and Wildlife Service employee killed by a falling tree while on fire-ground duty in 2008. We would suggest the award, or one of several annual category awards, should be named after the Late Helen George who did so much for wildlife rehabilitation, particularly in training and encouraging new volunteers and groups.

**Improving the sector’s access to funding** is a high priority particularly for the provision of enclosures to ensure appropriate Code of Practice housing standards are met. Many groups or individual members simply cannot afford code-compliant housing and such things as “double-entry” door systems and in the latter case have learned of inexpensive alternatives to reduce the potential for escapes. Even though double-entry doors are a Code Guideline, concern was expressed from within the rehabilitation sector that the audit/inspection process rated this as if it was a Standard. Again it was felt that this was a box ticking exercise and there was a loss of touch with reality and lack of understanding of affordability for volunteers.

We are not sure whether the “coordinating body” mentioned on P13 refers to the Peak or some other body in respect of new funding opportunities.

**Standards of care and training** are indeed an ambitious activity but should be of the highest priority. We need to look at methods of training delivery and prioritise resource material handouts with the option of printed form for easy reference. The sector will continue to attract the older age demographic because these are the people with the time-availability to “drop everything and go” to help a native animal in need and devote the regularity of feeding required. We must recognise that demographic’s learning patterns are different from school and young tertiary age students.

*Wildlife care training for vets and vet nurses*, **Comment:** While this is sorely needed and preliminary consultations have taken place it is not the top training priority in our view. We believe the highest priority is *Standard induction and specialised species training for volunteers*.

**Assessment of competency** is not something that should be expected to be done immediately following training. Competency can only be assessed after hands-on practise on what the training has taught. Sure one can be tested whether they understand the basic principles of what to look for or how to weigh and measure, but on ability for hands-on work with wildlife – no. Even a simulated “catch a bird and put it in a box” is not truly assessable because the bird that we might be permitted to use has had that happen many many times and does not behave like a wild bird needing rescue.

**Mentoring and Species Co-ordination** are vital aspects of good rehabilitation management practices and all help in encouraging good systems will be welcome.

**Compliance templates** to ensure best practices are met would be of great value to groups.

**Knowledge and information access:** *Streamline reporting and improve access to data.* **Comment:** At time of writing the sector is awaiting advice of a first consultation meeting of data officers. FAWNA is totally supportive of all improvements that make this valuable resource one that is easy for groups to administer and makes data available in a consistent and useable form for all stakeholders. FAWNA’s own system is based on NSW Wildlife Atlas Codes, is robust and data is quickly available to researchers who may seek particular information (e.g. macropod road kills over a postcode range). We know researchers’ frustration about not being able to access the information they want over a larger geographic area, or for the whole state.

We believe that groups should be required, as they once were, to provide data at a 3 or 6 monthly interval, rather than historically at the end of a licence year. More regular reporting allows trends to be readily identified, provides data-users with meaningful and current data, and prevents a backlog of incomplete data that requires a superhuman effort to resolve at year end. This recommendation might not be well received over the whole sector. It would not take a huge injection of funds from government to provide all groups with a web-based reporting system. Such systems exist and could easily be tweaked to suit all geographic regions and different methods the groups have of recording original wildlife encounters. The use of drop-down boxes for data entry would ensure consistency in naming animals for instance. The small number of people with no internet access can be offered a “records buddy” as we offer in FAWNA.

**Community awareness and recognition:** *Introduce a single wildlife rescue number.* **Comment:** While a commendable aim, particularly if such a system works and is prominently featured on highway and road signs state-wide, in our view it is a much lower priority in the whole list of Focus areas. Groups need to be reassured that this system is designed to augment, not supplant, their telephone duty system currently in operation.

**Resources developed** to help groups educate and create awareness of all things wildlife in our communities will be a marvellous initiative.

**Government regulation and support:** *Introduce a system of accreditation for volunteer wildlife rehabilitation organisations.* *Comment:* This intention has been flagged from the original Biodiversity Conservation Act discussion paper recommendations and one made clear to all rehabilitation groups over several years, including in the management consultations. The *transitional accreditation supporting checklist* we have found in some instances is somewhat short on detail of what might or might not be regarded as achieving an acceptable standard in the decision process towards granting accreditation. In meeting with the OEH at NWC forums, questions have been asked, but remain unanswered, about sample acceptable documents already in existence that might be adopted by groups. We further reiterate previous assertions in a different forum that there was an expectation that materials provided to OEH on management, policies, systems, and governance, would be evaluated and feedback given as part of readiness for an accreditation system. This expectation has been refuted but remains firm in the minds of many groups' representatives present at the management consultation meetings held with OEH personnel at different times and at different locations. Smaller groups, even more pressed than most for volunteer capacity to deal with such issues, are concerned about their ability to meet expectations when they do not know what the expectations are and there is no guidance to meet them.

We agree with the weight put towards the six categories of volunteer support and service delivery.

Under **A more flexible policy framework** we do not agree, and **vigorously oppose** the suggestion that up to 20% of a group's members could reside outside their boundary without a MOU. We are willing to provide our reasons but it would be inappropriate to do so in a public document. Suffice to say this suggestion has the potential to cause public confusion when they know "Joe" lives in X Group's accredited area, but is a member of Y group whose accreditation is centred in another area. We are not opposed to the principle of close-to-boundary members, but 20% is far too high a figure and we believe could have unthinkable adverse unintended consequences for the smooth running and harmony intra and inter-group.

We believe that good practices and policies should obviate the need to splinter group membership in the suggested fashion, but accept that "some people just can't get along" and perhaps a very minor exception might be made to accommodate proven rehabilitators but only in exceptional circumstances.

We thank you for the opportunity to comment on this extensive review and evaluation of NSW's robust wildlife rehabilitation sector. FAWNA is in its 30<sup>th</sup> year of operation on NSW's mid-north coast. FAWNA is proud to be a contributing member of this unique band of volunteers that punches far above its weight in volunteering for injured, orphaned and at need native animals in NSW.

*Meredith Ryan*  
*President*  
*5 April, 2019*