



Native Animal Rescue Group (NARG) submission to NSW Volunteer Wildlife Rehabilitation Sector Strategy Consultation Draft

NARG would like to take the opportunity to thank the Office of Environment and Heritage for the opportunity to have input into the review of the work of wildlife rehabilitators in NSW.

Below are a few comments in response to the NSW Volunteer Wildlife Rehabilitation Sector Strategy Consultation Draft.

Wildlife care training for vets and vet nurses

Information for veterinarians: Veterinarians deserve respect but at the same time they also need to listen to carers. Carers often know which drugs work best for particular illnesses or species and which drugs are contraindicated. In fact, some commonly used drugs are lethal to some species. The failure of veterinarians to listen to carers about appropriate drugs has led to the unnecessary death of some animals.

A quick reference book for veterinarians detailing common conditions in native animals, symptoms, recommended treatment, appropriate and inappropriate medication/drugs would go a long way to improving the relationship between wildlife carer and vet.

Training

It is vital that the costs of courses be kept to a minimum. Carers spend a lot of money caring for our native animals and costly courses will only discourage people from attending courses regularly.

The issue of standardising and accrediting courses is something that causes concern. There will need to be agreement about what constitutes best practice. For example, some rehabilitation groups circulate documents that advocate releasing wombats weighing less than 10 kg. NARG has vast experience raising and rehabilitating wombats and we know from our experience that the survival rate of animals weighing less than 25 kg is very poor and releasing a wombat weighing less than 10 kg is a death sentence. NARG would not support any recommendations that we knew were not in the best interest of the animal.

Experienced carers in particular need to keep their continuing education relevant. Redoing the same course every few years is of no educational benefit to an experienced carer.



Continuing Education Proposal: Wildlife carers could adopt a system of continuing education similar to veterinarians.

Each carer should be required to achieve a certain number of points every two years.

Below is an example:

Reading a paper: 1 point

Reading a book: 2 points

Complete an online tutorial and test: 2 points

Attending a course: 3 points

Attending a conference: 3 points per day

Teaching a course: 4 points

Each carer would be responsible for keeping their individual reading/training record. These records can be produced at an audit or submitted to OEH annually.

Accreditation trainers

In the teaching profession there is a body that registers specific training courses through a quality control process that evaluates course content and materials. Teachers are then able to undertake identified training courses as a way to improve their teaching skills and continuing education. Perhaps OEH could institute a similar register for courses and trainers so that trainers can gain accreditation by doing certain courses and are actively improving their teaching skills.

Accreditation of courses

Accreditation of wildlife rehabilitation courses should not be based on equivalency to VET or ASQA accreditation standards for courses. This is an expensive and complex process and it is not appropriate to apply these standards to volunteer groups' courses. Rehabilitation groups should not have to go to these lengths to have their courses accredited by OEH. Likewise, wildlife rehabilitators should not be forced to undertake VET or ASQA accredited courses to continue their voluntary work.

Promoting stronger compliance

Ensuring compliance with regulations, codes of practice and best practice animal husbandry is important but OEH needs to provide rehabilitation groups with the authority to enforce the appropriate level of care or to confiscate animals from non compliant carers. There could be an appeals process through the local OEH office if there is disagreement about whether a carer is complying with codes of practice and appropriate animal husbandry.

Conflict resolution: Disagreement between carers and/or species coordinators about what constitutes appropriate care is not analogous to workplace disagreements. Providing best practice in animal husbandry and compliance with rules and codes of practice should always be the goal. Failure to follow the codes of practice, appropriate nutrition or best practice animal husbandry does not require 'conflict resolution'. Providing the best possible care for an animal should not be up for negotiation and mediation is not appropriate. If anyone is engaging in practices that are contrary to codes of practice or best practice they should be told to improve their level of care or have their animals confiscated. Likewise, if an 'experienced carer' insists on ignoring current information they should also be told to adhere to current practices.



Loan proposal to improve compliance and animal husbandry: The cost of enclosures that comply with the codes of practice is often beyond the capacity of carers in the short term. If each rehabilitation group was given a grant/loan of \$5,000-\$10,000 to utilize as a group administered 'loan scheme' for their members to build enclosures this would enable more carers to provide appropriate enclosures. Loans to members of each group would be repaid to the group over a short period (six to twelve months) and then the funds could be reloaned to other members. This scheme would enable carers to build facilities that meet OEH codes of practice but are too expensive to do from their own budget in a single payment. For example flight aviaries cost a minimum of \$2,000 to build but a no interest loan could be paid off over a year for about \$40 per week. A \$1,100 aviary for housing possums could be paid off over year at \$22 per week. Kangaroo compounds are much more expensive at about \$3,500 so an 18-24 month payment plan would see the loan repaid for \$34 to \$49 per week. These amounts would be within the budgets of many carers and significantly improve the housing conditions of animals in care and compliance with codes of practice.

Single wildlife rescue number

This is laudable but it must be staffed 24 hours a day every day. An app like the IFAW app that gives a person the phone number of the rescue group at their geographic location might be a better approach. Alternatively, a web site similar to a 'store locator' that provides the phone number of the local rescue group when an address is typed in might be easier to administer.

Flexible policy framework

NARG is supportive of the proposal to allow up to 20% of its members to reside outside our boundary without a memorandum of understanding. NARG feels strongly that working closely with other groups is the path to the best outcomes for animals and carers. NARG and Wildcare Queanbeyan have a MOU and these two groups work well together to achieve the best outcomes for animals in need. NARG and Wildcare Queanbeyan have a good working relationship with LAOKO as well. Unfortunately, the good will of both NARG and Wildcare Queanbeyan in attempting to get MOU's has not always been reciprocated. Both NARG and Wildcare have worked hard over the years to get MOU's with two other wildlife rehabilitation groups without success.

Service capability

NARG would like OEH to consider asking some groups to prove that they can provide service to certain areas within their area of operation, particularly when there is no MOU. From NARG's perspective there is one group that has responsibility for a small area that is adjacent to NARG's area of operation. This area would be much better served by NARG members but the group currently responsible for this area will not allow it to be transferred to NARG. This is not in the best interests of animals in need of assistance in this area nor does it benefit the community who become upset that no one has come to help these animals in distress.

NWC peak body

NARG believes that the NWC has done a good job representing wildlife rescue groups. The development of codes of practice has been a significant achievement. The fact that a lot of

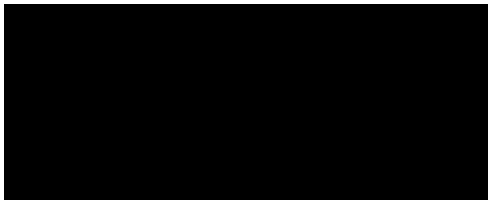


wildlife carers are not aware of the existence of the NWC is more a reflection on carers and their group rather than on the NWC.

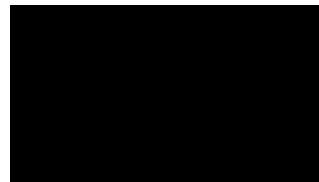
NARG would not like to see the dissolution of the NWC simply because WIRES left the peak body and refuses to rejoin. NARG is aware that the NWC has made repeated overtures to WIRES to rejoin but these have been rebuffed. We are aware that OEH does not want to hear criticism of WIRES but this does not help other rehabilitation groups or the NWC address problems created by WIRES. Creating a diluted 'advisory board' simply because WIRES refuses to return to the NWC is not the solution unless the aim is to reward WIRES for their recalcitrant behaviour.

Supplementary comment

Like many of our sister organizations, NARG is deeply concerned about the changes that OEH will be undergoing and its amalgamation into a department that does not have the environment as its sole concern. We feel that this does not bode well for the interests of our native animals and environment. The pending dissolution of OEH has caused distress amongst the wildlife rehabilitation sector and added to the concerns of members that the environment and their work is not valued by the government.



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