



Wildlife Rescue South Coast Inc.
(formerly Native Animal Network Association Inc)

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10 April 2019

Wildlife Rehabilitation Sector Strategy

National Parks and Wildlife Service
Biodiversity and Wildlife Unit (Level 3)
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RE: NSW Volunteer Wildlife Rehabilitation Sector Strategy

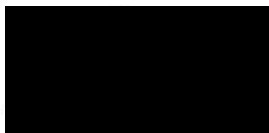
We thank the OEH for drafting this strategy and providing this opportunity to comment. Wildlife Rescue South Coast (WRSC) supports the majority of proposals in the strategy, which we believe will strengthen the ability of the sector to perform more effectively. There are a few proposals we do not support, where there are better alternatives, or where the risk outweighs the benefit, or where we believe the proposal impinges on the stability or viability of an independent wildlife rehabilitation organisation.

We have responded to each proposed item in the strategy and have accompanied each with a familiar "traffic light" icon to indicate the following:

- Green – WRSC fully supports the proposal
- Amber – WRSC has concerns about aspects of the proposal, or wishes to propose an alternative approach
- Red – WRSC opposes the proposal, and may propose an alternative approach

The submission is divided into two parts: The first part is the main section which addresses the strategy document. Part two is much shorter and addresses a few specific issues in the accreditation document. If you desire any clarification, please contact us at the above address or via email to secretary@wildlife-rescue.org.au

Sincerely,



Jenny Packwood
Secretary
Wildlife Rescue South Coast



INTRODUCTION

Wildlife Rescue South Coast Inc. (formerly Native Animal Network Assoc Inc) has continuously provided wildlife rehabilitation services on the NSW south coast for over thirty years. Our boundaries range from south of Wollongong to the Victorian border, west to the Southern Highlands and Southern Tablelands. It is mostly rural in nature, with a large and diverse wildlife population.

For many years, WRSC has contributed to the broader rehabilitation sector. Our members were involved in founding the Australian Wildlife Rehabilitation Conference in 2003/04 and the NSW Wildlife Council in 2004/05. Our NWC representative created the NWC website, adapted the international Wildlife Rehabilitators Code of Ethics for NSW, collated the first draft wildlife rehabilitation Code of Practice, and drafted the NWC Conflict Management Guidelines.

WRSC has great respect for the work done by other wildlife rehabilitation organisations, especially those pioneer organisations whose volunteers have provided services to the community, giving freely of their time, money and resources for over three decades. These organisations share our desire to advance the sector, and appreciate the efforts by the officers of the Office of Environment and Heritage (OEH) in working with us to achieve that end. *In light of recent announcements, we wish to clarify that the term “OEH” in this document refers to the Office of Environment & Heritage and any future agency which takes on the functions currently managed by OEH.*

We acknowledge the Veterinary surgeons and nurses in the areas we operate across, in southern NSW, without whose assistance, skills and generosity, much of our work would be impossible. We also take this opportunity to express our appreciation to the OEH officers who developed the “Review of the NSW Volunteer Rehabilitation Sector”. The findings of that report are of great interest to the sector’s workers and organisations, and allow other stakeholders a more realistic view of the complexity and value of the sector.

WRSC is committed to improving the wildlife rehabilitation sector, and it is with this background and commitment that we provide feedback on the draft OEH Wildlife Rehabilitation Sector Strategy.

PART 1 - THE NSW VOLUNTEER WILDLIFE REHABILITATION SECTOR STRATEGY

We acknowledge the work done by officers of OEH in producing this document and the supporting documents. The comments in part one apply to the strategy paper. Part two is a short section that focuses solely on the accreditation paper.


A) General Comments (Not specific to sections of the strategy document)

- In progressing this strategy, it is important to respect the independence of volunteer wildlife rehabilitation groups, which are Non-Government Organisations (NGO) that have responsibilities by which they are ethically and legally bound. They have invested significant effort and funds to build their organisations and have a duty to protect and preserve their assets and investments. It would be inappropriate for the regulator to impose conditions that unreasonably or unnecessarily harm the stability or viability of these NGOs.
- WRSC believes that the NSW system whereby a limited number of organisations is licenced or accredited, is more effective than other models in use in other states of Australia. WRSC notes that within the existing system there are issues which reduce effectiveness, and which are not specifically addressed in the strategy. In a number of cases these issues are caused or exacerbated by inconsistencies in the policies and actions of the regulator. We raise them here with the hope that in going forward, the regulator will take this into account and look to improving their own performance as much as we hope to improve ours. Examples below:


1. From the outset the regulator preferred to structure the sector by authorising a limited number of wildlife rehabilitation organisations, and assigning them a geographical area in which they can operate and from which they can recruit their volunteers – but then created overlapping ranges which significantly complicated the practical application of those ranges. It also created a different arrangement for WIRES, ORRCA and Australian Seabird Rescue. Many organisations were unaware of the areas assigned to other organisation until 2005.
2. Despite a preference for the stability and advantages of a limited number of wildlife rehabilitation *organisations*, the regulator has continued to support *individual licence holders* for over two decades.
3. The regulator has legislation designed to protect native animals from ‘harm’ (as defined in the Act) and imposes stringent and appropriate requirements on wildlife rehabilitation organisations before they are allowed to ‘harm’ native animals, yet allows hobbyists to keep an ever-increasing number of native species as pets, without the same level of oversight, despite documented welfare issues and complete lack of any conservation value.
4. The regulator issued a policy in the mid 2000’s that it would encourage greater consolidation of the sector and would not issue further rehabilitation licences, yet licenced several new organisations within a few years of issuing that policy.
5. The regulator requires wildlife rescue organisations to ensure its members comply with OEH regulations, licence conditions and codes of practice, and has been inconsistent in providing compliance activity to enforce these codes and regulations. When organisations have expelled members for chronic failure to comply, the regulator has on some occasions appeared to ‘take sides’ with the non-compliant volunteers (and in the worst case, issue them licences). This has undermined the ability of the organisations to enforce regulations – which the regulator requires them to do.
6. To comply with regulations, policies and codes, wildlife organisations (especially those who have operated successfully for over three decades) have spent considerable time, effort and money to create governance structures and funding arrangements that allow them to operate effectively, responsibly and professionally. It has been difficult at times to do so, when the regulator has acted inconsistently. WRSC calls on the regulator going forward, to act with greater consistency, especially in regards to its own legislation and regulations, and not to introduce changes which specifically disadvantage those very organisations whose structures, policies and funding have been shaped by their desire and willingness to comply with the regulator’s legislative, policy and regulatory requirements.

Comments which follow should be read with the above concerns in mind.

B) Challenges and aspirations (Draft Strategy, P6)

-  WRSC concurs with the report’s findings in this section of the document

C) Table of Focus Areas, Planned Actions and Expected Outcomes (Draft Strategy, P9)

-  WRSC agrees with most of the information in this table and supports the intent. We have some concerns about the proposals for post-release monitoring and aspects of the “more flexible” policy framework, which are detailed in sections ‘O’ and ‘T’ of this document.

D) Volunteer Support and Culture (Draft Strategy, P12)

- WRSC supports the proposals to improve standards of governance including proposals to help new leaders adjust to their role. We hope that by 'leaders' OEH includes office holders such as presidents, chairs, treasurers and secretaries. We recommend making use of existing resources offered by organisations such as Volunteering Australia, OurCommunity and similar organisations.

E) Facilitating a unified peak body (Draft Strategy, P12-P13)

- WRSC supports the creation of a reformed, united peak body, and understands that it is the responsibility of the sector to put this in place. We feel that membership should be optional, but offer significant financial, administrative and other advantages that strongly encourage membership. Membership should require compliance with a set of standards that will initially reflect existing codes, but which will be enhanced in the future through special resolutions. We expect a united peak body to take a lead role in addressing many / most of the initiatives outlined in the draft strategy.

Based on the findings of the OEH Wildlife Rehabilitation Survey and our own observations, we do not believe that the NSW Wildlife Council *in its current form* has the capacity to fulfil this role. We believe that achieving this will require a fundamental shift in the governance and approach of the peak body. We believe this should manifest as a “fresh start” with a new name, new constitution and a more energetic, proactive and inclusive approach.

F) New Strategic Agenda (Draft Strategy, P13)

- WRSC Supports the proposals in this section, subject to the concerns we outline in “General Comments” In section “A” and “Facilitating a unified peak body” in section “E” above. WRSC looks forward to actively contributing to these initiatives.

G) Improving the sector's access to funding (Draft Strategy, P13)

- WRSC recognises that not all volunteer wildlife rehabilitation organisations have sufficient skills to attract appropriate funds to support ongoing operations. We would welcome any assistance in this regard. We also welcome the opportunity to secure a patron for the sector.

H) Standard Training for Volunteers (Draft Strategy, P14)

- WRSC has a longstanding commitment to volunteer training and has collaborated with other wildlife organisations in the drafting and delivery of wildlife rehabilitation training.
- We welcome the development of standardised training and hope that the unified peak body will play a key role in this. It is **important** that any process considers the cost of developing quality training and ensures the delivery is accessible and affordable to volunteers.

I) Mentors and Species Coordinators Support (Draft Strategy, P14)

- WRSC agrees that the use of mentors (including 'buddies') and species coordinators greatly assist in providing improved levels of care. We support any initiative that will help us improve the effectiveness of our volunteers through mentoring, as well as any initiatives to assist our hard-working species coordinators. We also encourage greater use of intra-organisational networks for specialised species such as raptors and flying-foxes.

J) Wildlife Care Training for Vets and Vet Nurses (Draft Strategy, P15)

- WRSC has excellent relationships with veterinary practices throughout our area and supports the proposal to improve wildlife care training for veterinary professionals.

K) Updated Triage and Treatment Protocols (Draft Strategy, P15)

- WRSC takes pride in keeping up-to-date with current treatment protocols through attending training courses and conferences, accessing information online, via books and through interactions with other rehabilitation practitioners. We welcome any support that will ensure our treatment protocols reflect best practice.

L) Promoting Stronger Compliance (Draft Strategy, P15)

- WRSC supports the proposals to promote better compliance, both in terms of internal and external (OEH) compliance audits.
- WRSC is cognisant of the difficulties that arise if a volunteer refuses entry to their property. WRSC looks forward to working with OEH and a unified peak body to achieve greater compliance with standards.

M) Streamlined Reporting and Improved Access to Data (Draft Strategy, P16)

- WRSC supports the proposals to improve data access, quality and reporting, and believes it is possible to collect data more effectively by using standardised codes and creating a more useful Minimum Data Set, more specifically tailored for purpose. We believe it is possible to use data from the sector to support research and biosecurity
- It is important that changes are well designed and do not place an unreasonable burden on volunteers and that any changes take into account the demographic and geographic profiles of the wildlife rehabilitation sector.

N) Connecting Volunteers to Other Professional Networks (Draft Strategy, P17)

- WRSC supports and welcomes the proposal whereby OEH will help connect the sector with other scientific, veterinary and welfare networks.

O) Post Release Monitoring (Draft Strategy, P17)

- WRSC welcomes the implementation of programs to monitor animals after release.
- Our concerns are that this is done in a way that does not pose a risk to a successful release, or incur an unreasonable financial burden or safety risk on wildlife volunteers.

P) A Single Wildlife Rescue Number (Draft Strategy, P18)

- WRSC supports and welcomes the proposal for a single wildlife rescue number for NSW, with the provisions that the facility must:
 - operate 24/7/365
 - intelligently and fairly distribute calls to the closest organisation to the caller
 - make use of 'rescue hotline' phone numbers currently in use
 - not require contact details of individual volunteers
 - not place an unreasonable financial burden on wildlife rehab groups

- be done after careful consultation with the sector – and specifically with wildlife rehabilitation organisations which have invested heavily in sophisticated call centres
- Offer *at least* the functionality of rescue call centres already in use in the sector

Q) Guiding Community Education About Wildlife (Draft Strategy, P19)

- WRSC supports the proposal to help develop resources to help wildlife rehabilitation groups educate and raise awareness about urban wildlife and promoting sustainable behaviours that prevent injuries to wildlife. We recommend OEH considers working in partnership with other organisations which already provide similar material.

R) Promoting Awareness about Volunteer Participation in Wildlife Rehabilitation (Draft Strategy, P20)

- We fully support the proposals for OEH to develop media to improve community awareness and understanding about wildlife rehabilitation volunteers and their contribution to wildlife and the environment.

S) Accreditation of volunteer wildlife rescue and rehabilitation organisations (Draft Strategy, P21)

- WRSC supports the proposal whereby wildlife rehabilitation groups will need to meet criteria in six categories (Governance, Training & Support, Standards of Care, Service Capacity, Record Keeping and Veterinary Services).
- WRSC supports the proposal to phase in the new process over time, and to work with the sector to refine criteria and develop standards as necessary (as long as the standards and criteria do not create an unreasonable financial or administrative burden, and that the criteria are determined following meaningful consultation with the sector).
- WRSC has concerns about a few specific arrangements outlined in the Accreditation document and will communicate those concerns in item ‘W’ below.

T) A More Flexible Policy Framework (Draft Strategy, P21)

- WRSC supports the proposal to retain the model by which services are provided by groups, as opposed to introducing alternative service delivery models.
- WRSC does not support allowing groups to recruit members outside of their boundary without requiring an MOU. Introducing this change would unfairly disadvantage organisations which have strived for full compliance with existing standards and regulations, while providing advantage for those who do not. It is an unfair and unreasonable proposition that raises serious questions about:
 - government interference with internal administrative arrangements of NGO’s impacting their viability and ability to manage their own volunteers
 - who would supervise, train, support and audit volunteers who live a distance from their ‘home’ group, but in the boundaries of another organisation?
 - how volunteers would receive rescue calls, if they don’t live in an area covered by their ‘home’ group?
 - the effect of fundraising in the boundaries of another group
 - incurring veterinary and other expenses of supporting wildlife rehabilitation volunteers living in the area, who do not contribute to the organisation.

In our experience, the requirement for this arrangement often arises from conflict between individuals – including those who continuously fail to comply with OEH and organisational requirements. It allows those people to “shop around” to create a situation where they can operate unsupervised.

The draft strategy calls for greater standardisation across the sector as well as improved education, better governance, use of conflict management protocols and more effective compliance enforcement. WRSC supports all of these proposals and believes that if successfully implemented, they would largely negate the perceived requirement for out-of-area recruitment.

WRSC provisionally supports the proposal to encourage new groups to seek accreditation - but only where existing service suppliers are incapable or unwilling to meet the identified need. We would support a process such as the following, which could provide OEH with additional options and facilitate superior results without creating unnecessary hardship for existing service suppliers:

- A service need is identified, or a new service is proposed by a prospective new organisation and communicated to OEH
- OEH seeks input from the reformed peak body, which would discuss and report to OEH advising whether: (a) an existing service provider is already meeting that need, or (b) an existing service provider would like to be considered as a potential provider, or (c) no existing service provider can, or wishes to, meet the need.

WRSC supports the proposal to explore additional opportunities for augmenting home-based care with more central-based facilities. We are cognisant of the additional financial burden involved in creating and maintaining a central facility. Even where land and buildings are provided at nominal cost, the cost of power, rates, security and maintenance can add tens of thousands of dollars to the organisation’s annual operating expenses.

WRSC appreciates the proposal to reduce red tape in transporting animals across state borders for treatment and rehabilitation. WRSC has some concerns about the practice, and would not wish to see animals routinely, or unnecessarily transferred long distances.

U) Ongoing Strategic Support Services (Draft Strategy, P22)

WRSC greatly appreciates the intention of OEH to support to the sector by:

- Seeking funding from the Foundation for National Parks
- Implementing rehabilitation actions within the NSW Koala Strategy
- Allocating additional staff to implement this strategy
- Covering the cost of the sector’s public liability insurance
- Advocating the work of the sector within NSW Government Agencies
- Improving compliance via random audits and investigating breaches
- Making better use of data, including delivering an annual report
- Reviewing and promulgating standards

PART 2 – ACCREDITATION OF VOLUNTEER WILDLIFE RESCUE AND REHABILITATION SERVICE PROVIDERS IN NSW

WRSC acknowledges and understands the background, benefits and the legislative and policy framework as described on pages one and two of the accreditation document.

V) Requirement for accreditation (Support Document – Accreditation, P2 Section 2.1)

- WRSC acknowledges and understands the requirements for accreditation.

W) Obtaining Accreditation (Support Document – Accreditation, P2 Section 2.2)

- WRSC acknowledges and supports the approach to obtaining accreditation with a caveat in relation to proposals from new (prospective) service providers. We would like OEHL to consider alternative options such as that proposed in item ‘T’ on page 6 of this document.

X) Unsuccessful Applications and Varying/Revoking accreditation (Support Document – Accreditation, P3 Section 2.3 and 2.4)

- WRSC believes the approach regarding unsuccessful applications and the approach to varying or revoking accreditation are reasonable and acceptable.

Y) Implementation of Accreditation (Support Document – Accreditation, P3 Section 3)

- WRSC understands and supports the implementation approach, including:
 - A three-year transitional accreditation based on existing standards and policies
 - The development of standards in each of the six accreditation categories in concert with the reformed peak body
 - After three years, when the new criteria are in place organisations will need to reapply for accreditation
 - Thereafter organisations will need to reapply for accreditation every five years.

Z) Transitional Accreditation Standards and Assessment Criteria (Support Document - Accreditation, P5 Attachment 1 and Attachment 2)

- WRSC has read and understood the transitional accreditation standards and assessment criteria and supports their adoption. WRSC makes the following comments re the standards:
 - Applicants will be given appropriate time to implement any new requirements.
 - In the “Training and Support” standards, the sentence “Wildlife rehabilitation group declares that its current members ... are trained and competent to undertake their assigned role” – should refer to “current authorised members” (as groups may have non-authorised members who, for example, do administration work only).

- End