

OEH Wildlife Rehab Strategy – WIRES Submission

Overall Comments

WIRES would be more comfortable with the very substantial program of work OEH is proposing if there were any sign of the substantial additional resources necessary to support the sector to deliver it and meet the intended outcomes.

- OEH's undertakings to "work with the sector" to achieve a large number of desirable outcomes gives us little confidence;
- We are not very interested in having to report to OEH every three months on our progress on the myriad separate fronts it thinks we should be pursuing;

A more targeted strategy, supported by resources commensurate with the objectives identified, would have a much better chance of achieving real improvements on the ground.

We note the recent announcement by the NSW government that OEH is to be dissolved. For brevity we have used "OEH" as shorthand for "the successor organisation(s) to OEH" throughout this response.

Vision (p. 8)

"Wildlife rehabilitation is recognised as part of Government's chain of services for delivery of natural resource management objectives."

This language is grossly misleading. Wildlife rehabilitation is provided almost entirely by the voluntary sector, with minimal government support. WIRES objects to this blatant attempt to re-badge voluntary sector activity as somehow provided by government.

The Government has not actively supported the sector over the past three decades and in more recent times has been unable to meet its minimal obligations under the Fauna Policy. The abolition of the Office of Environment and Heritage and the transfer of these responsibilities to the Department of Planning and Infrastructure starkly fails to recognise the importance of the Environment portfolio. Despite the significant effort by OEH in researching and developing the draft strategy, the government has failed to address the shrinking resources provided to the sector despite the steadily increasing workload the rehabilitation sector has faced over the last decade.

OEH could have, and should have, already created a set of standards for care and tools for the sector to support our regulatory obligations. Instead, inconsistent decision making, a lack of compliance effort and direct funding to support the service has negatively affected the wildlife sector. Some examples of this include:

- The licensing of new groups, as opposed to support for existing groups to better manage conflict, has significantly affected WIRES.
- The licensing of individuals defecting from established groups due to conflict or animal welfare issues has, in some regions, depleted or completely collapsed WIRES services.

- The lack of support for a database for smaller groups; something that would have simplified their data collection.

This goal ('recognition as part of Government's chain of services'), if it were achieved, would be likely to increase the misperception in the public mind that wildlife rehabilitators are paid government workers, rather than unpaid volunteers. As such, it directly undermines the Strategy's goal of "Community recognition and appreciation of volunteers and native wildlife is improved."

WIRES believes this wording should be removed from the document.

Planned actions (p.12 – 22)

In general, we are finding it difficult to comment effectively on the list of "Planned actions" when it is unclear in most cases who will undertake them:

- How many of these (and which ones) is OEH planning to do itself?
- How many does it expect the sector to undertake?
- Of those that turn out to be the sector's responsibility, does OEH expect regular reports on progress?

Facilitating a unified peak body and new strategic agenda (pp.12-13)

WIRES would be happy to discuss a more representative peak body provided WIRES' representation on it is commensurate with its membership of around 40 per cent of the sector. Previous history in this area is not encouraging.

WIRES' departure from the New South Wales Wildlife Council (NWC) is well documented and we have previously highlighted numerous areas in which the NWC failed to professionally and inclusively represent the interests of all stakeholders, including WIRES. We have maintained a productive working relationship with the NWC; however we would anticipate that radical change is needed for the unification of the sector under the umbrella of a new 'peak body' and would support a solution that is more representative of its member groups.

WIRES would support a new 'peak body' that was formed with the following goals in mind:

- Its governance and management structure must appropriately reflect the skills, abilities and size of its member organisations;
- It must be ethical, transparent and competent in all its dealings with its stakeholders including the rehabilitation sector, OEH, State Government and other agencies;
- It should have a well-defined charter, with roles and objectives that are endorsed by all of its members;
- In particular, it needs to be able to make some decisions that bind its members; and
- It must be capable of timely and thoughtful decision making.

The 'new strategic agenda' represents a grand plan with minimal additional resources devoted to it, and hardly any specific commitments from OEH. We would be interested in who is intended to undertake all this activity. The "Service Partnership Agreement" seems likely to increase the reporting burden on the sector while providing only minimal real additional support from the government.

The emphasis is on the sector supporting itself and taking on more specialised tasks previously undertaken by OEH. This is offered in exchange for the creation of a new website, a set of standards and a range of proposals that appear largely to demonstrate OEH's lack of understanding of the limitations of working within the not-for-profit sector.

[Standards of care and training \(p.14\)](#)

WIRES already has its own Welcome Kit. A short video from OEH, appropriately pitched, could be useful; it could possibly outline the importance of complying with the relevant Codes of Practice.

We strongly support the \$1.5million in additional funding for additional wildlife care training for vets and vet nurses, and welcome the allocation of responsibility for provision of the training.

An equivalent financial commitment to training within the rehabilitation sector would demonstrate that carers who work voluntarily are equally valued.

We would be interested in the resources OEH is proposing to provide for training mentors, and also in the "Priority workshops for wildlife rehabilitators in regional areas" – both of these could be valuable initiatives.

[Promoting stronger compliance \(p.15\)](#)

While WIRES supports the goal of improving standards of care within the sector, there are substantial resource implications for both providers and OEH in establishing an effective periodic audit program. Within the organisation, it requires experienced carers who are relatively free from other responsibilities, impartial and able to devote the time. Meaningful support from qualified OEH staff, particularly in the more difficult cases, will also be essential. For WIRES there will be substantial travel and accommodation costs as well.

[Knowledge and information access \(p.16\)](#)

While OEH's intention to "explore opportunities for post-release monitoring" is welcome, effective post-release monitoring is likely to be labour-intensive and expensive. WIRES supports the concept, but it needs resourcing beyond the current capacity of wildlife care groups.

[Single Wildlife Rescue Number \(p.18\)](#)

WIRES is strongly opposed to this proposal. The proposal directly undermines WIRES, as the largest provider of community support for wildlife. For it to be effective OEH will need to set up and maintain its own call centre; there is no indication that adequate funding has been provided to do this.

There was no consultation with WIRES prior to the announcement of the single number for wildlife rescue. The WIRES number and brand is recognised as the single number for wildlife rescue in NSW. Currently WIRES manages state-wide and national calls and we estimate that last year the WIRES Rescue Office handled more than 150,000 rescue calls, resulting in 90,000 requests for assistance or rescue.

Our projected annual cost for managing calls to the WIRES 1300 number during business hours is in excess of \$800,000. In addition, outside of business hours, our goal is to manage 150 calls per night at an additional cost of \$480,000 per year.

Under the proposed single number

- WIRES will manage more than 80% of all calls without recognition.
- the overflow of all calls to groups who are currently not managing their own local calls will continue to fall to WIRES.
- There is no provision for a technology framework for the rehabilitation sector as a whole to manage calls and to receive recognition for doing so.

We have seen a trend within WIRES itself over the past decade for individual branches to be unable or unwilling to reliably staff their own phones. In 2009, 16 regional branches supported their own local calls using volunteers. In 2019, WIRES supports 26 of its 28 branches via the WIRES Rescue Office, which is staffed by paid employees. If this trend is reflected in the wider rehabilitation sector, we are likely to see even more groups relying on WIRES to support their phone service. Two other licensed rehabilitation groups are already doing this.

We have seen an increase in the number of calls to WIRES generally, and in particular from areas in which WIRES is not licensed. This probably indicates that some existing groups are already unable to consistently support their phone services. Approximately 20 per cent of NSW calls to WIRES are for areas in which it is not licensed.

Given these trends, it was highly irresponsible for OEHS to make a public commitment to a single state-wide number without any plan to support the current call volumes, let alone the increased call volumes the new number is likely to generate.

We note however that there will be marketing to “promote the new service”. A state-wide phone number is not, of itself, a new service and, if not properly staffed, will merely increase public frustration. The same volunteer wildlife rehabilitation groups will still be providing the actual service behind the scenes. The promotion of a single number for wildlife rescue appears to be an opportunity for the Government to further promote itself off the back of the not-for-profit sector.

In view of the range of problems involved, WIRES will not accept calls passed on from the proposed government number.

[Accreditation of volunteer wildlife rescue and rehabilitation organisations \(p20\)](#)

Apart from the change of name, it is not immediately obvious to us how ‘accreditation’ differs from licensing. It is extremely unclear to us how replacing licensing with accreditation, supported by internal and external compliance audits, will “reduce red tape” or “reduce regulation and provide a more flexible framework for accredited volunteer organisations to operate”.

One of the conditions of licensing used to be that a licence was only available if it could be demonstrated that an area was not being serviced. Abandonment of this requirement will see further splintering of groups.

The form of accreditation proposed gives the sector no assurance as to how OEH will manage increasing fragmentation within the sector. Splinter groups are more likely to form when compliance is largely internal, and in the absence of a commitment from OEH to support the current groups and not accredit more.

As the document notes, the transitional arrangement will be a box-ticking exercise for most well-established rehabilitation organisations. Our concern is that it will remain a box-ticking exercise well into the future.

“Develop(ing) standards where they don’t currently exist” may be helpful – we will be interested in what is proposed in this area.

[Conditions for accreditation \(p.2 of supporting document “Accreditation of volunteer wildlife rescue and rehabilitation service providers in NSW”\)](#)

We are not clear whether the new conditions for accreditation (the ability to harm or possess animals in order to mitigate property damage or protect human safety) will be a requirement for accreditation, or just activities that will be permitted. In either case, we would reject any attempt by OEH to raise expectations among the community that wildlife rehabilitation organisations will provide such services.

OEH cannot devolve its responsibility to deal with aggressive or troublesome animals or birds to volunteer organisations. Wildlife rescue organisations do not have the capacity or training for dealing with these cases, and cannot be responsible for the required assessments of risk to humans or to the animal itself. It will frequently involve organising the trapping or shooting of healthy animals, and may also require other specialised training (eg to inspect a roof cavity safely).

Mitigation of property damage is not the responsibility of wildlife care organisations except in cases where there is a risk that the animal could injure itself.

[Out-of-area representation \(p.21\)](#)

WIRES does not consider that greater flexibility is needed or that members should be allowed to operate outside licensed boundaries, even under an MOU. The licensing of members outside group boundaries increases the risk of poor animal welfare outcomes and facilitates conflict between groups.

In our experience the majority of requests for out-of-area licensing are as a result of volunteers wishing not to comply with group policy or practices, wishing to be unaccountable, or due to conflict. Volunteers who are geographically distant from their group executive cannot be effectively managed. This magnifies the difficulties already involved in managing the oversight of animals in care from rescue through rehabilitation to release.

The proposed greater flexibility in out-of-area residence qualifications will exacerbate the problems of fragmentation within the sector (referred to above).

Preference for central facility style wildlife hospitals (p.21)

This 'preference' emerges from the review document without supporting evidence or consideration of possible difficulties or contra-indications. WIRES would like to see a much more careful discussion of the pros and cons of proceeding in this direction, including consideration of any lessons from past successes and failures, rather than the essentially unsupported recommendation provided. There may be reasons why there are only a small number of these facilities now.

Importing from and exporting to interstate (p21)

WIRES considers that the "import into or export out of NSW" of animals and birds requires accountability and careful monitoring. Apart from cases where the wild population from which the particular animal is drawn clearly overlaps the state boundary, it will increase the risk of spreading disease and, in the longer term, reduce genetic diversity. The risks are magnified substantially if the range of native animals and birds that can be kept as pets is increased.

Ongoing strategic support services (p22)

We would be interested in whether the recently announced changes to administrative arrangements affect the commitments of \$4.05m from the Koala Strategy and \$1.2m from the Foundation for National Parks and Wildlife.

We would also be interested in exactly what is meant by developing "a business case for allocating the \$1.2m provided by the Foundation". Is this funding not yet allocated or is the "business case" more about how it will be distributed?