



DEPARTMENT OF PLANNING, INDUSTRY & ENVIRONMENT

Submissions report

NSW Volunteer Wildlife Rehabilitation Sector
Strategy



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Summary

This report provides a summary and analysis of submissions received in response to the draft NSW Volunteer Wildlife Rehabilitation Sector Strategy and support documents.

The total number of submissions received was 53. These included submissions from two peak bodies, the NSW Wildlife Council (NWC) and Australian Veterinary Association (AVA). Thirteen volunteer wildlife rehabilitation organisations contributed submissions, including the Wildlife Information Rescue and Education Service (WIRES), the largest wildlife rehabilitation organisation in New South Wales, and one of its branches.

Submissions were also received from one licensed individual rehabilitator, six not-for-profit associations and a government agency. The remainder were from private individuals, many of whom are members of wildlife rehabilitation organisations.

The volunteer wildlife rehabilitation sector in New South Wales is unique in that it is comprised of a large group, WIRES, which represents about 45% of volunteers in the state, along with over 25 other small, non-affiliated groups of varying membership sizes and areas, dispersed across the state. Nearly all groups are represented by the NWC, apart from WIRES and a few of the smaller groups.

This situation creates a challenge for the Government in regulating the sector and in interpreting the submission responses. We have endeavoured to give appropriate weight and consideration to all the views expressed.

We have not only taken into account the range of views expressed in submissions, but also the rationale underpinning those views. Some views demonstrate that further explanation or proof of efficacy of proposed actions is required by the Government. Other views reflect concern about the impacts of proposals on individual organisations, while the Government also needs to consider the benefits to the sector as a whole.

For these reasons our response to the submissions received is not only based on the number of positive, neutral or negative responses received, but also considers the broader needs of the sector, the range of issues observed in our regulation of the sector over the years, and the extensive engagement we have had with the sector in formulating the many proposals outlined in the strategy.

In response to the feedback received through this consultation process we will clarify proposals that are not well understood and where necessary, will slow implementation of the more contentious proposals to pilot solutions or discuss alternatives with those concerned. We will begin to implement those proposals that are ready to proceed.

Introduction

In February 2019, the Department of Planning, Industry and Environment released the draft NSW Volunteer Wildlife Rehabilitation Sector Strategy on the Department's website for public consultation. Included with the strategy were three support documents, the Review of the NSW Volunteer Wildlife Rehabilitation Sector: An evidence base for guiding future reform (the Review), Accreditation of volunteer wildlife rescue and rehabilitation services in New South Wales, and the Wildlife Rehabilitation Compliance Audit report (the compliance report). Written submissions were invited from all interested parties on the actions outlined in the strategy, the new system of accreditation and the findings in the review document.

This report summarises and analyses the submissions in response to the above documents. Responses illustrate the diversity of views in the sector, and no judgement is made about the accuracy or otherwise of the comments made. Submissions made by individual organisations are referenced where relevant. The report also includes a section on the submissions from three key stakeholders: the NSW Wildlife Council (NWC), the Wildlife Information Rescue and Education Service (WIRES) and the Australian Veterinary Association (AVA).

Note that National Parks and Wildlife Service (NPWS) was part of the former Office of Environment and Heritage and is now part of the Environment, Energy and Science Group of the Department of Planning, Industry and Environment (DPIE).

Key issues raised in the submissions

Future funding and support: The provision of additional funding to the wildlife rehabilitation sector was welcomed. Further detail was requested about the \$1.2 million funding from the Foundation for National Parks and Wildlife (FNPW). Suggestions given for additional financial assistance included funding for operational expenses, emergency response reimbursement and support including vaccinations for volunteers exposed to zoonotic diseases, and payments to veterinary practices to help offset their costs.

Unified peak body: There was recognition by the sector of the benefits of a unified peak body and support for Department efforts to facilitate this outcome. The NWC and WIRES currently have different expectations about the future shape and composition of a new peak body.

Stronger compliance: There is scepticism about the Department's ongoing commitment to compliance and enforcement to support the sector.

Single wildlife rescue number: Submissions demonstrate there is a lack of understanding about how the proposed single number will work, and concern that it will undermine existing services and brand recognition.

More flexibility about where people live: This was welcomed by a number of groups within the sector as a pragmatic policy initiative. Some submissions were concerned it would reward people who do not comply with their group's rules. There was some concern that people residing out of boundary would be difficult to monitor and train, and could result in conflict between groups.

Administrative burden: There is some concern the proposed reforms will increase administrative and reporting obligations with no additional support offered to groups.

Next steps

The Department has made amendments to the strategy to reflect the feedback received during the public consultation period. Proposed actions of key concern to wildlife rehabilitation providers will have their implementation delayed while further consultation is completed.

The Department intends to finalise and work with the wildlife rehabilitation providers to implement the new system of accreditation after December 2020. Existing licences will be automatically extended to ensure continuity of service until the process is complete.

Overview of submissions

How many submissions were received?

In total, 53 submissions were received by email or via the online submission form. Submissions that included an email address were acknowledged by email. In some instances, individuals provided a second submission that may have included additional information. These were counted as one submission; however, all individual content was considered in the analysis.

Submissions were accepted until close of business 12 April 2019 and then extended to 24 April 2019 for those who formally requested a late submission. Total length of the public consultation period was approximately seven weeks.

Who made submissions?

Submissions were received from the following:

- 13 NSW wildlife rehabilitation organisations (plus one branch of WIRES)
- 1 NSW individual licensed wildlife rehabilitator
- 2 peak bodies
- 6 not-for-profit associations, organisations or charities
- 1 government agency
- 35 individuals.

Two submissions had multiple signatories; one signed by three people and the other by eight, including the three from the former submission. They are counted here as eight individual members in the list above.

A list of respondents to the strategy is provided in Appendix A. Seven respondents requested their details be kept confidential.

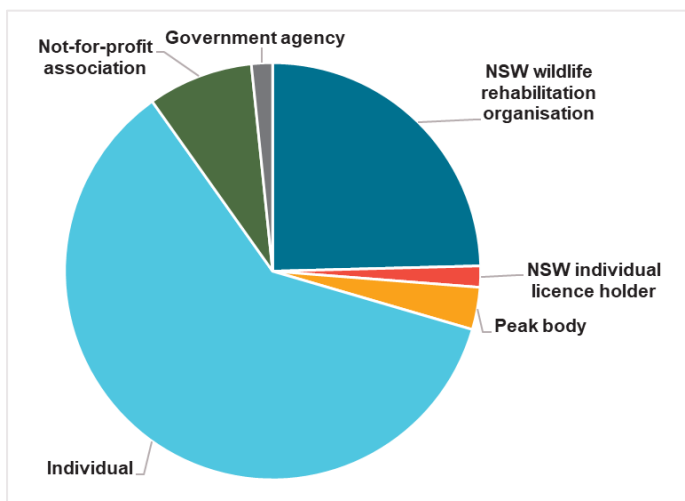


Figure 1 Number of submissions received from stakeholders

Publication of submissions

Submissions will be published on our [website](#), except where the authors have requested the submission be kept private or where the content was of a personal or confidential nature.

Summary and analysis of submissions

This section summarises and analyses the submissions in response to the issues raised in the strategy and support documents.

How submissions were analysed

A team of three people reviewed all submissions in detail and registered them in the agency’s corporate document management system. Each submission was allocated a unique number and content classified according to which aspect of the strategy and/or support documents it addressed. Only content relevant to the strategy and support documents was included in the analysis. This analysis identified which of the five focus areas and related planned actions (referred to here as themes) within the strategy garnered the most interest and feedback.

Submission content was reviewed to determine whether it was supportive, critical or neutral. Supportive comments were classified as those that agreed or were positive about the content; critical comments included those that disagreed with or were negative about the content, and those considered neutral were additional comments, questions and/or recommendations. The data provided in this report is indicative and not conclusive about the feedback. It does not purport to be a detailed analysis of every comment made in each submission.

Submissions were evenly spread across most of the five focus areas with ‘Government support and regulation’ receiving the most submissions and ‘Knowledge and information access’ the least input from submissions (Figure 2). The strategy also received a relatively high number of comments of a general nature. There were only a few submissions that commented on the ‘Implementation, reporting and evaluation’ component of the strategy, or on the review and compliance reports. Submissions about the proposed system of accreditation are included within the ‘Government support and regulation’ focus area.

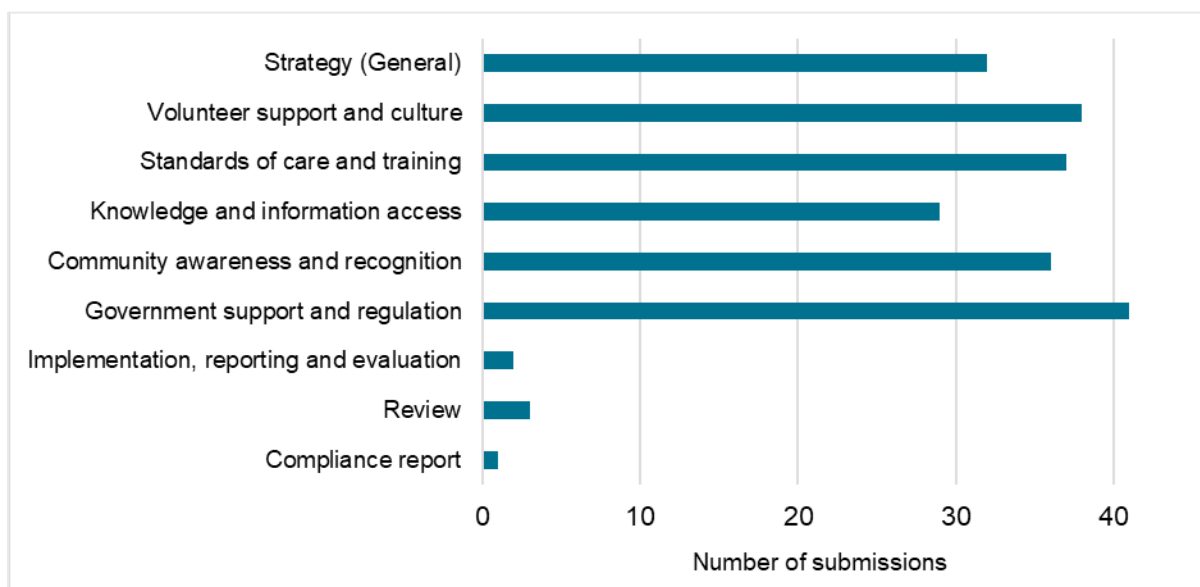


Figure 2 Number of submissions that addressed the strategy and two supporting documents

The strategy

This section discusses the submissions as they relate to the draft NSW Volunteer Wildlife Rehabilitation Sector Strategy, its five focus areas and supporting documents.

General

General comments about the strategy include its introduction and proposed timetable, vision and principles, challenges and aspirations, expected outcomes and use of images.

About a third of submission comments supported the strategy (Figure 3) and were appreciative of the Department acknowledging the work of the sector. They considered the document to be well thought out, easy to read and, if adequately resourced, had potential to improve standards and service delivery.

Critical comments stated the Department was out of touch with the realities of the wildlife rehabilitation sector, did not understand not-for-profit organisations, or the strategy was too broad in scope to achieve tangible improvements on the ground. Also, there was concern that the proposed actions would significantly increase the administrative burden on service providers. There were several comments about the need for additional resources if the Department expected the sector to lead the actions in the strategy.

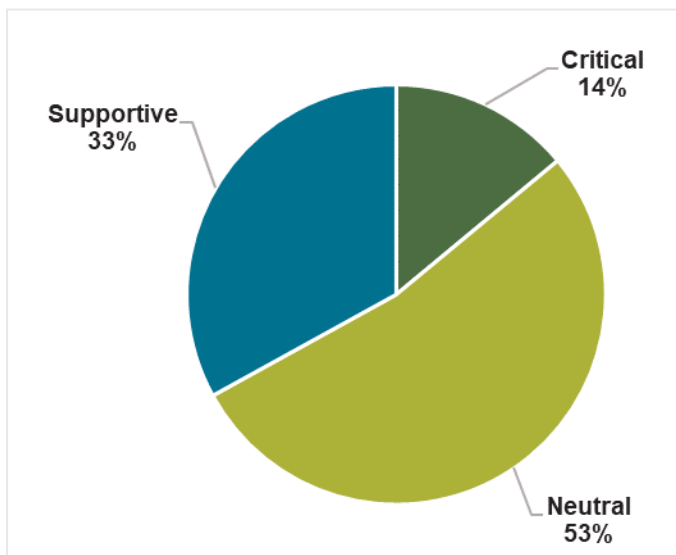


Figure 3 Percentage of general comments that were qualitatively assessed as supportive, critical or neutral toward the strategy

Two submissions were highly critical of the strategy's vision statement that wildlife rehabilitation be recognised as part of the Government's chain of service delivery for natural resource management. WIRES for example, found the statement to be 'grossly misleading' and an attempt to re-badge services provided by the volunteer sector as somehow provided by government.

The Department disputes this intention and disagrees with this interpretation. The actual intent of the vision statement is to acknowledge the work of the sector and recognise and consolidate it as a legitimate contributor to the Government's broader natural resource management program. If this strategic outcome is achieved, it will broaden the profile of the wildlife rehabilitation sector and expand its access to volunteers and future funding opportunities.

There were some negative comments about some of the photos used in the strategy that will be addressed in the final version.

Focus Area 1: Volunteer support and culture

This focus area outlined governance and funding actions that aim to increase the capacity of the wildlife rehabilitation sector to strategically support itself. The expected outcomes are to increase diversity and participation in the sector, strengthen the network of support for both service providers and their volunteers, and expand opportunities for the sector to access resources and become more sustainable into the future.

Most submissions received within this focus area were focused on the ‘Facilitating a unified peak body and new strategic agenda’ theme. For ease of interpretation, submission responses to this theme are split into two – the creation of a unified peak body and the key initiatives outlined in the new strategic agenda. Improving the sector’s access to funding also attracted a relatively large number of submissions (Figure 4). The least number of submissions to this focus area addressed the ‘Helping new leaders adjust to their role’ theme.

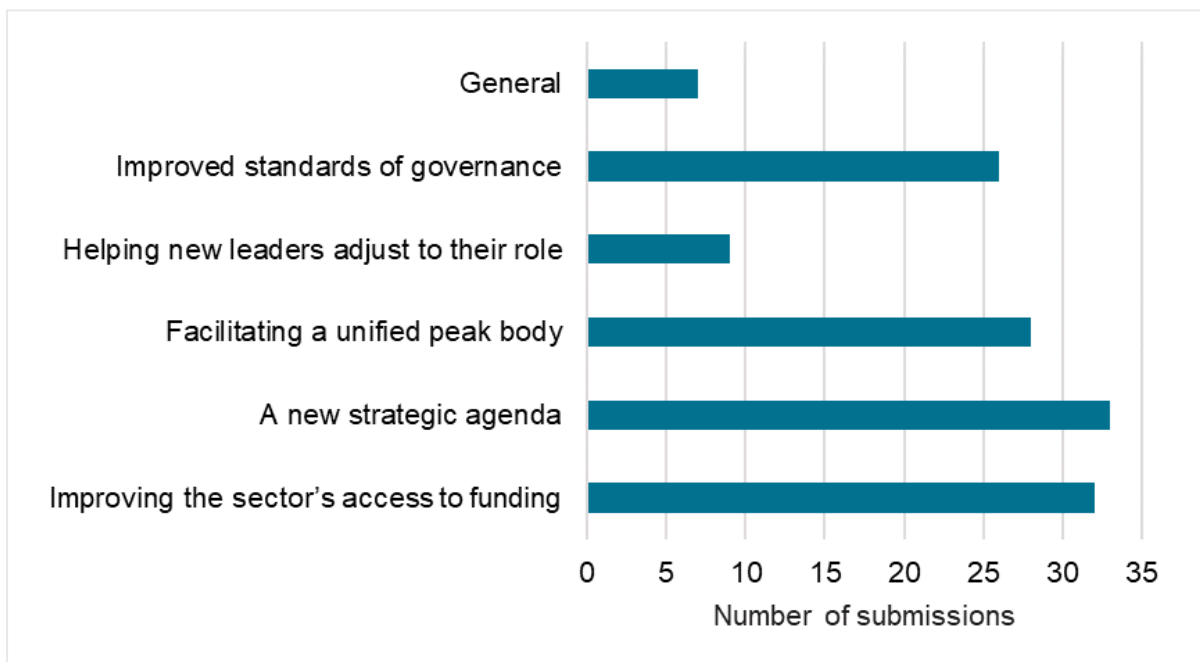


Figure 4 Number of submissions addressing each of the themes within the strategy focus area ‘Volunteer support and culture’

General

Comments about this focus area were evenly split between being supportive (20%) and critical (20%). Most comments were of a general nature. Some respondents welcomed the additional support toward managing their organisations and recognised the need to balance investment in both the people providing the service and the animals requiring rescue. Other respondents were concerned that the actions proposed would increase the administrative burden on their groups without resulting in any tangible benefits. Further information,

particularly about future funding opportunities, was requested and is included in the final draft of the strategy.

Improved standards of governance

About half (54%) of comments received were supportive of the actions within this theme. Respondents were generally positive about introducing standards that would benefit groups and their volunteers including the development of a welcome kit and introductory video. Nearly a fifth of comments (17%) were critical about the Government increasing the administrative burden on groups or forcing the sector to adopt standards that were not relevant to their sector. Another 29% were mostly neutral, with some stating they were not familiar with Volunteering Australia's National Standards for Volunteer Involvement (2015)¹ (national standards), while some cautioned against or asked about the work needed to adopt the standards, or volunteered to share resources they had previously developed.

The Department intends to work collaboratively with the sector to use relevant parts of the national standards as a guide toward implementing minimum governance standards across all wildlife rehabilitation providers. These standards would eventually be incorporated within the final model of accreditation. As the national standards state 'an organisation that can demonstrate compliance with the standards is well positioned strategically to recruit and retain more volunteers, as well as attract funding or sponsorship for new initiatives'. These are areas where we found the wildlife rehabilitation sector to have ongoing challenges.

Our review of the sector found many wildlife rehabilitation organisations already have in place policy, procedures and practices that conform to the national standards. This outcome is documented in detail in Chapter 5 of the review document. The Department intends to work with these organisations to develop a register of shared resources that can be used by the whole sector. This will be undertaken before new resources are developed. The national standards will be used to help improve and augment these resources. This will be explained more clearly in the strategy.

Helping new leaders adjust to their role

More than half of respondents' comments (55%) were supportive of this initiative. They recognised that managing volunteers is a challenge to their organisation and welcomed resources that would help succession planning and increase the capacity of volunteers who chose to step into leadership roles. There were no critical comments about this initiative. Some commented on the demands placed on leaders and whether online tools are the most effective form of education. The Department does intend to complement these tools with workshops for leaders, particularly in areas such as conflict management.

Facilitating a unified peak body

Over 50% of comments supported the need for a unified peak body and recognised the benefits of having a sole, strong and strategic advocate for the sector (Figure 5). In its submission, the NWC reiterated the important achievements and networking opportunities the peak body has brought to the sector and was supportive of a model that included the current arrangements along with the inclusion of WIRES. A number of comments reiterated these achievements and requested more financial and in-kind support be provided to give the NWC more capacity to carry out its work.

¹ Volunteering Australia 2015, *The National Standards for Volunteer Involvement*, Volunteering Australia, Canberra ACT.

The NWC was not supportive of a more diluted advisory body model. WIRES, which left the NWC in 2012, stated that radical change is needed before unification of the sector could occur. Some submissions made recommendations about how unification could be brought about.

Overall, respondents gave support to the role of an advisory board with external expertise either as an alternative or replacement for the existing peak body, if unification cannot be achieved. A key requirement was that the body represents balanced opinion and expertise and has a broad knowledge base inclusive of veterinary involvement.

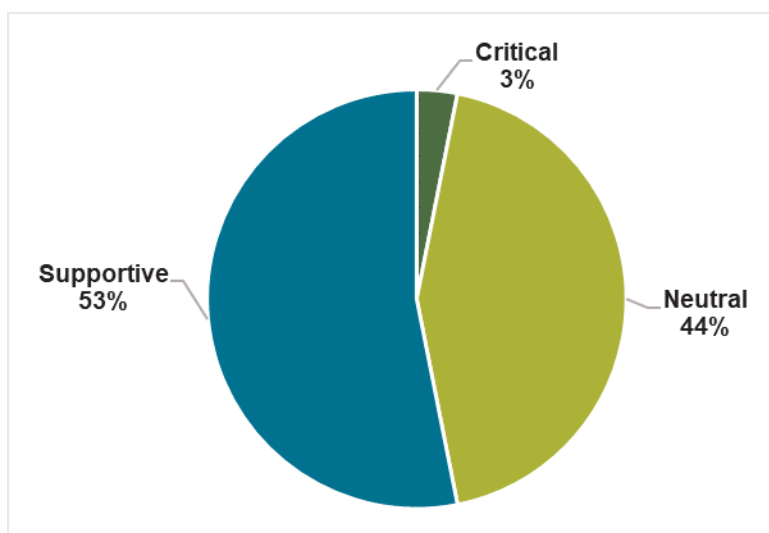


Figure 5 Percentage of comments that were qualitatively assessed as supportive, critical or neutral toward the strategy action to 'Facilitate a unified peak body'

Other comments recommended that membership of the peak body be a requirement of accreditation, which is not supported by the Department. Regardless of the model adopted, it is clear from the submissions that the benefits of a unified sector are understood and supported. The Department will take steps to attempt to broker the desired reunification, considering openly and transparently the concerns of the participants involved.

A new strategic agenda

The strategy specifies several strategic actions the Department wanted to pursue with the new peak body over the next three years. The three proposed actions that received most feedback were:

- **Increase volunteer participation and diversity in the sector:** Respondents critical of trying to attract a younger demographic to the sector argued that only older people had the time and resources to dedicate to wildlife rescue and rehabilitation.

Others recognised the socio-demographic challenges facing the sector and could see opportunities for younger people to get involved, particularly at central facilities or in roles other than as active carers. Some organisations are already implementing actions to achieve this outcome. As a result, the Department will consider with the sector the possibility of lowering the age at which a person can have an authority to participate in wildlife rehabilitation under future accreditation. It will also work with the sector and the [FNPW](#) to identify some pilot initiatives to address this item.

- **Volunteer of the year award:** Respondents appreciated the concept of volunteer recognition but were split over whether the idea was the best approach for the sector.

Concerns were raised about the difficulty in choosing one person over so many worthy volunteers, and the possibility the process could result in negative outcomes. Other respondents supported the concept. The Department intended the award to be one measure within a series of new actions to promote volunteers within the sector and will work with the peak body to refine this action.

- **Peak body endorsed trainers:** Respondents were interested in how the process would work and who it would apply to. This will be developed with the peak body. There were recommendations about trainers requiring minimum qualifications and other comments cautioning against this approach as it would raise the cost of training for volunteers. Minimum training qualifications for individual trainers is not within the scope of the strategy.

Proposals to help the sector with strategic financial advice and resources for managing volunteer stress and burnout were also supported.

Improving the sector's access to funding

Over 80% of feedback on this theme consisted of comments and recommendations. The remainder was supportive (13%) or critical (5%) statements. The feedback focused mostly on requests for more detail about the FNPW \$1.2 million funding initiative, which will be provided in the updated strategy.

Suggestions given for additional financial assistance included funding for operational expenses, volunteer stress assistance, emergency response reimbursement and support including vaccinations for volunteers exposed to zoonotic diseases, and payments to veterinary practices to help offset their costs. Many of these suggestions will have some level of funding in the FNPW business plan, which balances operational expense assistance for the sector with investment in initiatives that build long-term strategic capacity.

Those who were critical of the action expressed their frustration with the Government's focus on helping the sector apply for funding and the lack of success many groups have had applying for funds in the past. These difficulties were noted in the review of the sector, and that is why the strategy aims to improve the sector's success in this area.

The Department will continue to pursue the goal of helping to make the sector more self-sustaining by providing opportunities to leverage new funding opportunities on the back of generating greater understanding, appreciation and respect for the sector. This, coupled with the adoption of standards and good governance across service delivery, will give confidence to future funders of operations that the efforts and achievements of the sector are demonstrable, quality assured and worth supporting because of the outcomes achieved.

The concept of a patron for the sector received only three comments. Two comments were supportive, and one asked whether a single patron for the sector could be effective.

Focus Area 2: Standards of care and training

This focus area described actions that are intended to increase the standard and consistency of wildlife care across the sector. Outcomes included training standards for all volunteers, veterinarians and veterinary nurses, updated technical resources to guide the treatment of animals in care and improved animal welfare outcomes.

The two themes of this focus area that generated the most interest from the sector were 'Standard training for volunteers' and 'Promoting stronger compliance' (Figure 6). General comments were supportive about the need for specialised training and updated resources

but cautioned against replacing existing training with something that does not improve animal welfare outcomes, which is not the intention of the Department. There was also comment about the need for wildlife rehabilitators to understand how their role intersects with that of veterinary practitioners with respect to the provision of wildlife first aid and treatment.

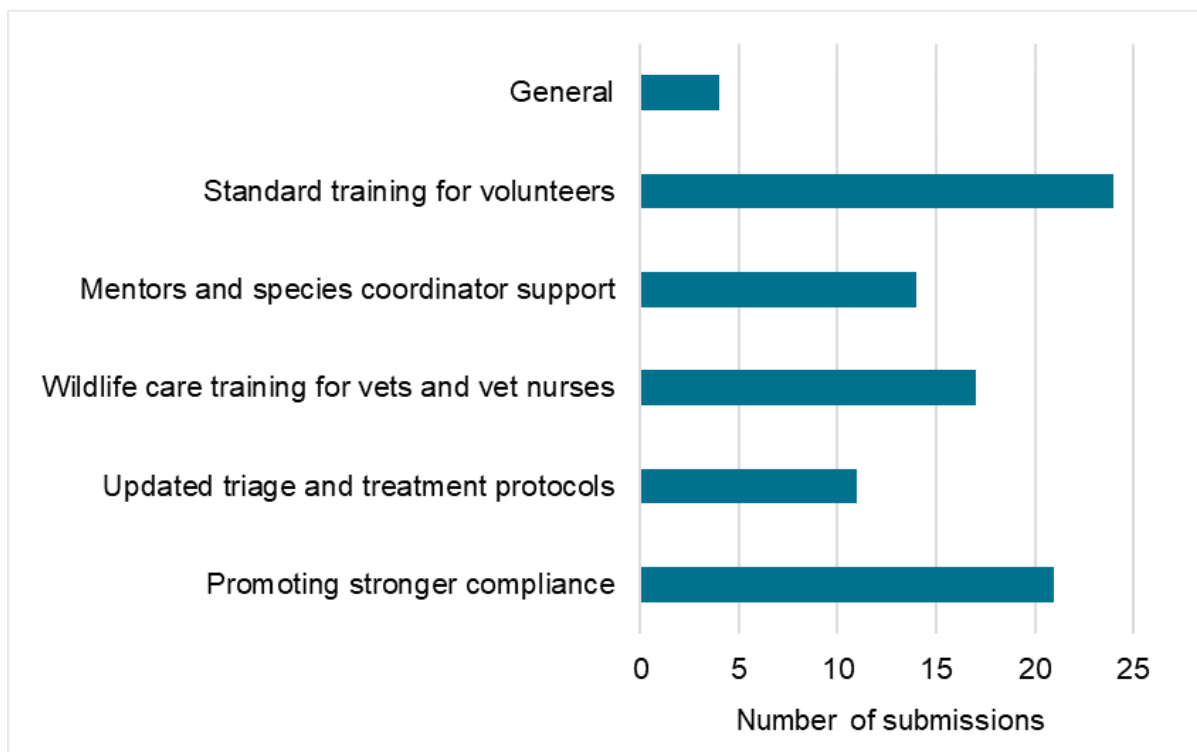


Figure 6 Number of submissions addressing each of the themes within the strategy focus area ‘Standards of care and training’

Standard training for volunteers

Nearly 45% of comments were supportive of this theme and only 8% were critical. Those in support commented that implementing a baseline standard is a priority and would assist in addressing disparities in wildlife care across the sector. The Young Lawyers Association, for example, said that standards are an appropriate strategy for increasing flexibility and transferability of volunteer skills.

Submission comments were generally directed to the following areas:

- Training standards need to be developed in collaboration with the wildlife rehabilitation sector and build on what exists in the sector already. The Department agrees.
- Implementation of the new standards must not impact on the cost of training and where possible be supported by funding to help deliver training, particularly in regional areas. The Department agrees and there will be some FNPW funding dedicated to delivery of training.
- Resources also need to be dedicated to updating training resources and materials to augment the standards. The Department intends to help develop, complement and/or enable greater sharing of existing training resources and this will be made more explicit in the strategy.
- Where possible, training in wildlife emergency response scenarios should be provided. The Department agrees and FNPW funding will be provided toward this action.

- Competency assessment should not form part of a training standard but come only after hands-on practice. This is inconsistent with the Codes of Practice (the codes), which were developed in collaboration with the sector. The requirement for competency assessment in the training standards is not intended to negate, but rather complement any other assessment tools organisations may have in place such as a probation period or mentor oversight.

Mentor and species coordinator support

About 60% of comments received supported this theme and acknowledged the important role mentors and coordinators play in providing improved levels of wildlife care. Some comments stated that mentors should be qualified and carefully selected and not be randomly assigned to the role without appropriate support.

A number of organisations reported they have processes in place for selecting mentors and acknowledge the need for resources that will help improve their communication, teamwork and conflict management skills, and retain them in the sector.

There was one critical comment about the Government again increasing the administrative burden on groups by requiring training for mentors.

Wildlife care training for vets and vet nurses

This theme has been allocated \$1.5 million in funding over three years from the [NSW Koala Strategy](#). Twenty-seven per cent of comments were supportive and none critical. About 75% of feedback to this theme included recommendations such as:

- Ensuring the training was well resourced and available to veterinary practitioners outside the main cities ([AVA](#)). Face-to-face hands-on workshops in Sydney and regional areas are a key component of the planned training course. These will include clinical rounds with wildlife vets, case studies, x-ray reading, necropsies and if possible, demonstration of handling and assessment with education animals.
- Expanding the scope of the action to having a larger focus on wildlife within the university veterinary curriculum. This is already an action in the NSW Koala Strategy.
- Ensuring the professional development program focuses more on medical issues and has less emphasis on handling, identification and triage skills. Veterinary and veterinary nurse stakeholders will be consulted during the development of the program to ensure it is balanced and focused on the appropriate skills.
- Providing additional technical resources for veterinarians that detail common conditions, drug dosages and recommended treatment protocols. This action is already identified in the strategy.

Updated triage and treatment protocols

Forty-five per cent of respondent comments were supportive of the actions in this theme. There was recognition that updated resources will benefit volunteer training and provide a more consistent level of care across the wildlife rehabilitation sector. There was also support for the common resource platform that will enhance the accessibility of resource material.

Respondents highlighted the need for peer review and veterinary involvement in their development and for the protocols to give clear guidance as to when veterinary assistance should be sought by a wildlife rehabilitator. A review of the existing codes was recommended to complement the action. The Department already intended to incorporate a review of the codes within the term of the strategy.

Promoting stronger compliance

Feedback on this theme shows there is a strong desire within the sector for greater compliance, but some frustration with Department commitments in the strategy. The overall nature of comments was:

- Mostly supportive of the intention of the Department to create standard templates. They must be simple, easily accessible, complemented by improved mentoring, and supported by additional funding to help volunteers comply with the codes. The Department agrees.
- Concerned about the constraints the volunteer sector has with resourcing audits and gaining power of entry to people's private property. Some comments stated that the Department was shifting too much responsibility for monitoring compliance to the sector.

The Department disagrees with this comment. This action is facilitating the outcomes of the [Independent Panel Review of Biodiversity Legislation](#), which stated that groups should have in place processes that ensure volunteers comply with standards. Government's role was to provide statewide standards of operation and undertake targeted compliance

- Two comments requested criminal background checks be undertaken on new volunteers.
- Supportive but sceptical of Department capacity to conduct random inspections and frustrated at the lack of consistency in compliance and enforcement response across Department field branches. The Department will develop tools to help staff prioritise how it responds to wildlife rehabilitation enforcement matters. The Department will not be able to respond to all requests and will need to use a prioritised approach when responding to requests for assistance.

Focus Area 3: Knowledge and information access

This focus area identified opportunities to improve the quality of data collected by the wildlife rehabilitation sector and better understand what happens to rehabilitated animals once they are released. Intended outcomes are to better utilise the data and make it more widely available for wildlife management and conservation purposes, and inform improvements to rehabilitation practices and release site selection.

Most submissions to this focus area were about the post-release monitoring and improvements to reporting and data access themes (Figure 7). The few general comments were either supportive of the planned initiatives or commented on the proposed outcomes. One submission requested the outcome for post-release monitoring be amended to better link this action with an evaluation of current release practices.

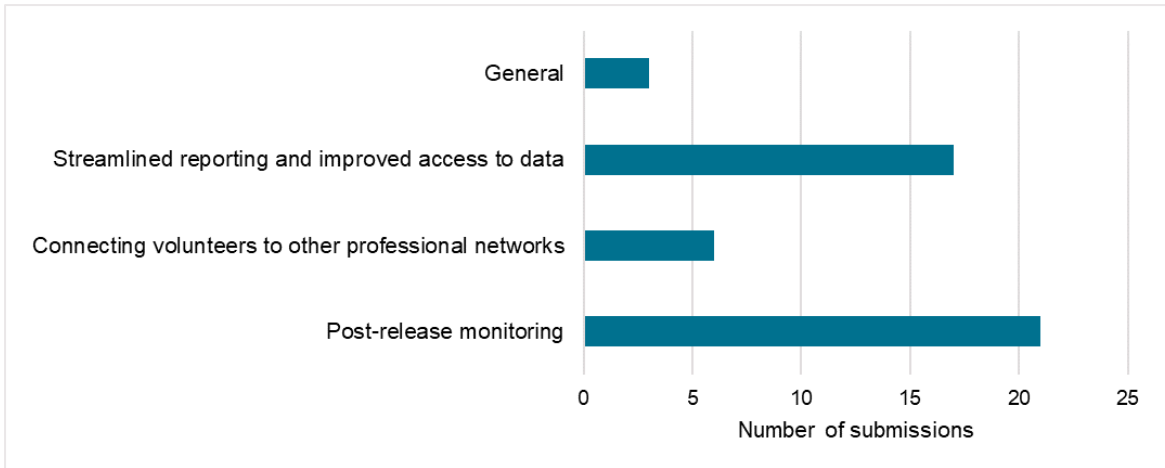


Figure 7 Number of submissions addressing each of the themes within the strategy focus area ‘Knowledge and information access’

Streamlined reporting and improved access to data

Respondents mostly agreed that the data collected by the sector can make a valuable contribution to strategic conservation and wildlife management outcomes. About 40% of the feedback was supportive of improvements to the quality of data if they were well designed and did not increase the administrative burden on volunteers. There were suggestions about introducing a national database for wildlife carer data, a data capture ‘app’ or a system for effortlessly capturing data from phone log to animal datasheet. Other comments cautioned however, against trying to replace groups’ existing systems with a new central database.

Critical comment (5%) focused on the administrative challenges volunteer organisations have with collecting and reporting data and the absence to date of any useful feedback to the sector about the data collected.

As stated in the strategy, the Department will prepare an annual report that will document and communicate trends in wildlife rehabilitation to the community, and include case studies that showcase the work of volunteers. The Department also intends to build a data visualisation tool that will enable the sector and local councils to explore long-term wildlife rehabilitation data and develop their own reports to help inform local conservation efforts, develop funding applications or use at schools and other public education forums. This initiative will be included in the updated strategy.

The Department is also currently investigating options for the development of a field data capture and management solution that will span multiple biodiversity programs. The wildlife rehabilitation sector will be invited to participate in a pilot of this new system when it is publicly available. In 2019, the Department loaded over 500,000 wildlife rehabilitation records into BioNet (the NSW Government repository for biodiversity data). This data covers six years of records captured by the sector and will be an invaluable source of information for planning, research and wildlife management purposes.

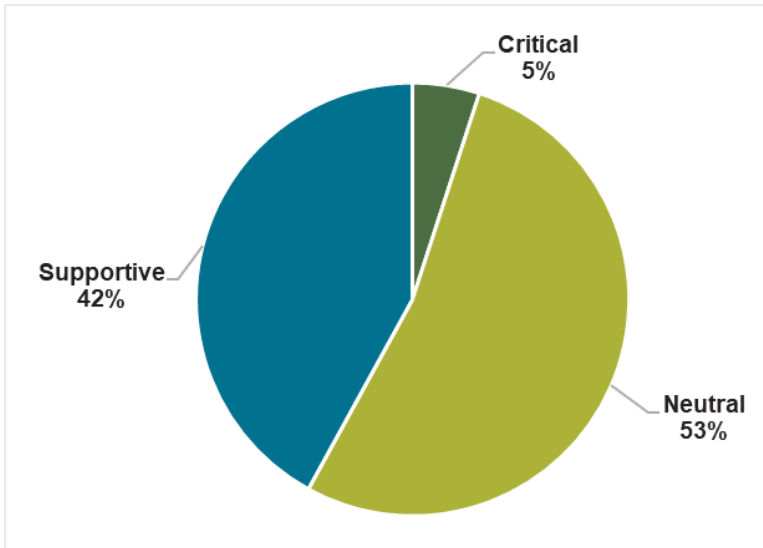


Figure 8 Percentage of comments that were qualitatively assessed as supportive, critical or neutral toward the strategy action to ‘Streamline reporting and improve access to data’

Post-release monitoring

Sixty-two per cent of comments gave in-principle support to post-release monitoring of rehabilitated animals. The International Fund for Animal Welfare (IFAW) for example, said it was an absolutely crucial and often overlooked part of wildlife rehabilitation.

There were no critical comments; however, respondents identified the significant costs associated with this action and the need to tie outcomes to improvements in rehabilitation practices. One comment said the focus should be more on helping the sector find new release sites for animals. Diminishing release sites was identified in the review as a challenge particularly for macropod species and resolution of this issue forms part of a broader land-use and habitat loss debate.

Connecting volunteers to other professional networks

There were no critical comments about this initiative. Half the comments were supportive of government facilitating greater sharing of knowledge and resources. Some comments expressed interest about how this would be achieved. Another comment recommended establishing a national phone line with paid veterinary support or an online chat forum. Such an approach is beyond the capacity of the strategy to deliver at this stage.

Focus Area 4: Community awareness and recognition

This focus area outlined initiatives that would improve community access to wildlife rehabilitation services, raise awareness about strategies for helping people manage their interactions with native animals, and improve community appreciation and understanding about the work of volunteers in the sector.

Most submissions on this focus area were about the single wildlife rescue number (Figure 9). This theme was one of the most commented on initiatives in the strategy.

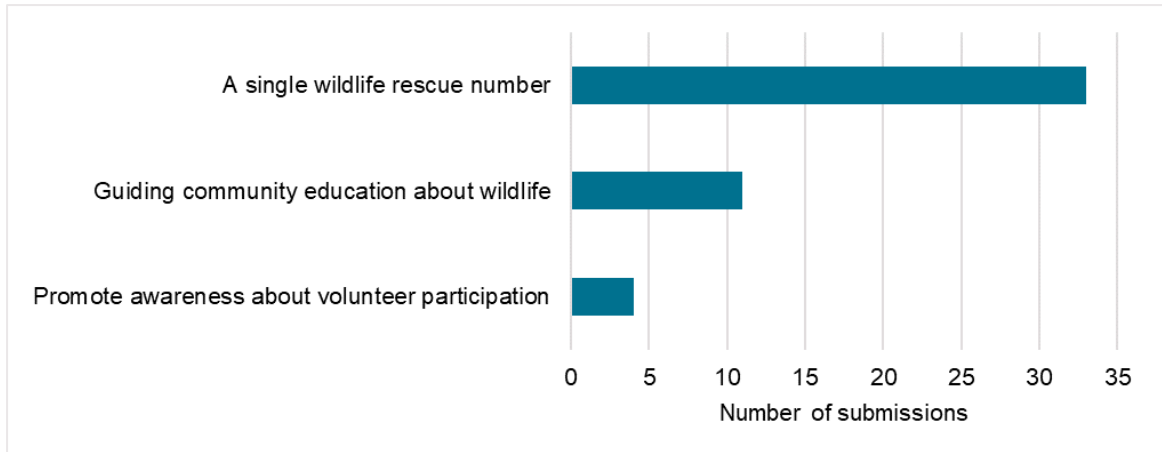


Figure 9 Number of submissions addressing each of the themes within the strategy focus area 'Community awareness and recognition'

A single wildlife rescue number

This proposed introduction of a single wildlife rescue number was first announced in the [NSW Koala Strategy](#) in May 2018 and the July 2018 [Australian Wildlife Rehabilitation Conference](#). It is included in the strategy because of its relevance to all wildlife rehabilitation organisations and species.

About 35% of comments were supportive and 23% critical of this theme (Figure 10). Over 40% of comments sought to better understand the concept or were concerned about its implementation and impacts to assets such as existing group signage. Large groups such as WIRES, which has extensive coverage across many parts of New South Wales, were strongly opposed to a single number, as was [Sydney Metropolitan Wildlife Services](#). The koala-focused group [Friends of the Koala](#) was also not supportive; however, groups such as [Wildlife Rescue South Coast](#) and [Port Stephens Koalas](#) expressed their in-principle support.

Comments in support of the proposal said the number would be easier for the community to remember in times of emergency and would provide better access to facilities. Those critical raised a number of concerns:

- There is no evidence that the new number will improve existing services and no evidence that rescues are delayed in the existing system.
- In areas where group boundaries overlap, the proposal to split calls may result in reducing group effectiveness and response times.
- There is existing signage promoting individual groups' contact details across New South Wales. Signage for the new number will create more confusion for the community.
- There is an existing [IFAW app](#) that helps people with mobile phones find providers in their local area.
- The number will impact the brand of a group and affect its capacity for fund raising.
- Individual licence holders would not benefit from the proposal.

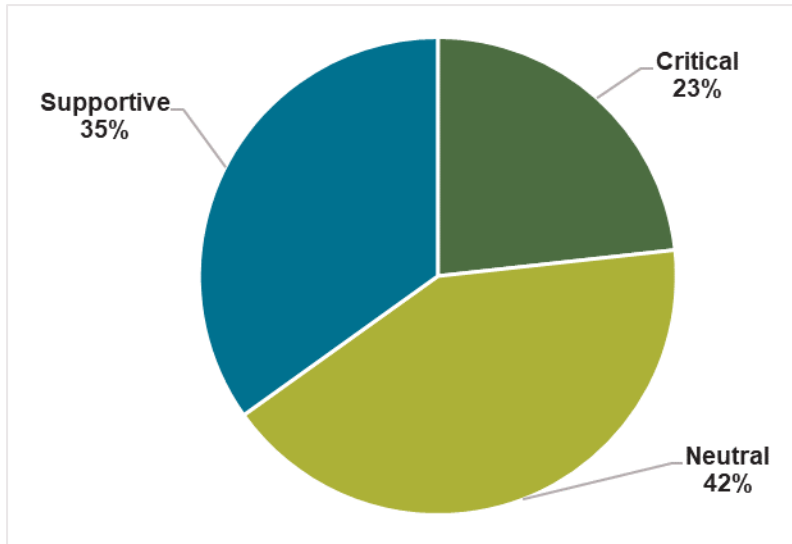


Figure 10 Percentage of comments that were qualitatively assessed as supportive, critical or neutral toward a 'Single wildlife rescue number'

A number of comments highlighted some misunderstandings about the concept and reinforced the need for the Department to consult more with the sector about how the single phone system would work.

The proposal did not include the establishment of a manned 24/7 call centre. The intention was to establish a single number that will automatically route a caller to the most appropriate wildlife rehabilitation provider based on their location and type of animal. Existing phone numbers held by each provider would not be replaced by the new system; neither would existing signage be replaced.

The proposal has been discussed widely in the sector yet there is still significant doubt about the intended mode of operation and impact to stakeholders. To avoid confusion, the Department has decided to delay development of the project and consult further with the sector.

Guiding community education about wildlife

Respondents acknowledged that the wildlife rehabilitation sector does play an important role in educating the community about wildlife and about 55% of comments were supportive of the action proposed in the strategy. It was suggested that the Department first collate and review existing resources before developing new ones. Some respondents flagged the need for local councils to be given more capacity to deal with wildlife issues. Critical comment focused on use of the term 'problem urban wildlife' in the draft strategy as it sends the wrong message to the community. The Department agrees and will use a more appropriate term in the final version of the strategy.

Promoting awareness about volunteer participation in wildlife rehabilitation

The small number of comments were mostly supportive of this theme.

Focus Area 5: Government support and regulation

This focus area outlined the Department’s proposed framework for regulating wildlife rehabilitation services into the future. It described how accreditation of wildlife rehabilitation providers would be implemented, the proposed changes to its Rehabilitation of Protected Fauna Policy (the Policy), and the type of ongoing strategic support services that would be provided to the sector. The intended outcome is to maintain and improve support to the sector and ensure ongoing services are consistent, reliable and undertaken in accordance with set standards.

Most submissions were about the new system of accreditation and other suggested changes to the regulation of the sector, in particular the proposal to allow up to 20% of a group’s members to reside outside the group’s boundary (Figure 11). General comments about this focus area cautioned the Department about increasing the administrative burden on groups and imposing additional red tape.

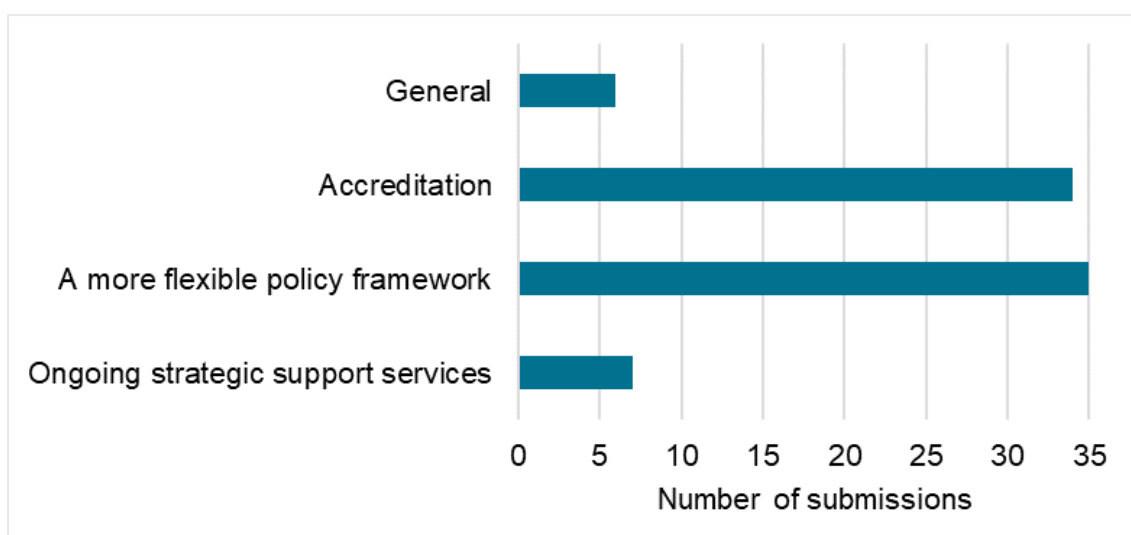


Figure 11 Number of submissions addressing each of the themes within the strategy focus area ‘Government support and regulation’

Accreditation of volunteer wildlife rescue and rehabilitation organisations

The accreditation process will have a sizeable and immediate impact on wildlife rehabilitation organisations and it is no surprise there were many comments (>100) on this theme. About 80% of the feedback was supportive or neutral in tone (Figure 12). Comments in support said accreditation will have a positive influence on the sector and would improve standards of care.

Critical comments questioned the need for accreditation or how it differed from the current system of licensing. The origin and rationale for accreditation is discussed in the support document Accreditation of volunteer wildlife rescue and rehabilitation service providers in NSW.

Several submissions were concerned about implementation of the system and the potential for a significant increase to the administration requirements of groups, particularly small ones. There were requests for further information and assistance with the roll-out of accreditation, and concerns about the timeframe. A few submissions also wanted clarity

about how the accreditation criteria would apply to existing licensed individual wildlife rehabilitators.

The Department understands that accreditation is new to the sector and has undertaken the following steps to help guide the process:

- Initiated a process of ongoing consultation with the NWC about the accreditation process and the needs of its members.
- Extended all licences for an additional 12 months to 30 June 2020. This will give the sector continuity of service and provide an additional six months to prepare for accreditation. We intend to further extend licences to 31 December 2020 to ensure all volunteer service providers have had sufficient time to recover from the recent fire emergency.
- Assessed the strengths and weaknesses of each group in the sector with regard to the accreditation requirements. This will help groups work toward compliance with the accreditation standards in areas where they are not currently compliant.
- Undertaken an inventory of policies, procedures and protocols currently used by various groups in the sector which are considered compliant with the standards. This inventory will be made available to the sector as a shared resource.
- Split the accreditation criteria for organisations and individuals into separate checklists.

There was feedback on the proposal to give new groups the opportunity to seek accreditation in areas of New South Wales not currently serviced by an existing wildlife rehabilitation group or where specialist support was needed. The comments fell mostly into two categories:

- The first category felt that by opening accreditation to new groups the Department was not supporting existing groups. There was concern that the sector would be fragmented with the potential addition of new groups. These submissions wanted new groups to only be accepted if there was a clear and demonstratable lack of service in an area.
- The second stated that accreditation should enable more competition in the sector and therefore new applicants should be encouraged to apply. This outcome could lead to an increase in the number of volunteers, decrease response times and improve outcomes for wildlife.

The Department intends at first to offer the opportunity of accreditation to existing groups only. As stated in the review document, the Department intends to retain its current policy of not granting a prospective new group access to geographic areas already serviced by an existing group. This will enable groups to retain their profile in their respective local communities. The exception will be where a group is unable to comply with the requirements of accreditation or where a specialist species group can augment existing services. The Department also does not propose to offer more individual rehabilitator licences except in areas where groups do not currently operate.

Submissions indicated general support for the six categories of service delivery accreditation will be assessed against. Some were critical of the emphasis on self-assessment, stating it could become a box-ticking exercise. The Department disagrees with this comment and intends to verify applications for accreditation with groups on an individual basis.

Some comments about the individual standards were as follows:

- **Governance:** Accreditation should not be restricted to organisations incorporated under the Associations Incorporation Act 2009. In response, the Department considers an incorporated organisation to offer a much higher level of protection to members of the organisation than those that are unincorporated. Department policy also currently allows registered companies operating under the Prevention of Cruelty to Animals Act 1979 to apply for a licence.

- **Training:** The criteria, particularly around assessing competency against learning outcomes, are too onerous for smaller groups. The Department will remove the requirement for competency against learning outcomes during this transitional phase, but will reintroduce this requirement once training standards have been implemented.
- **Service capacity:** Requiring a response within 1–2 hours in remote areas is unrealistic. The Department understands this constraint and will amend the requirement to allow more flexibility in response times; however, wildlife rehabilitation groups will need to consider whether their current area of operation is commensurate with their member numbers when they apply for accreditation.

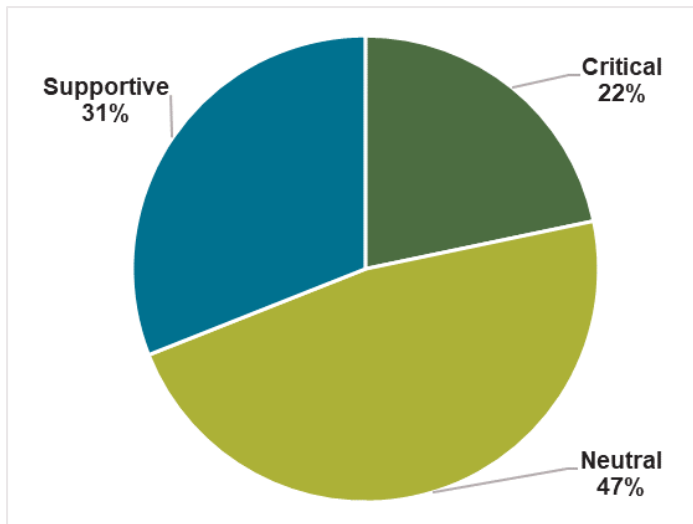


Figure 12 Percentage of comments that were qualitatively assessed as supportive, critical or neutral toward accreditation

One submission queried the wording around priority being given to new providers seeking to establish a central facility such as a wildlife hospital. The submission noted that by using the word hospital, it may be misinterpreted to mean the facility has an attached veterinarian, when in fact it may not. Veterinary hospitals licensed under the *Veterinary Practice Act 2003* are not within the scope of this system of accreditation.

A more flexible policy framework

A number of actions were proposed under this theme. They included permitting greater flexibility where members of groups could reside; encouraging new groups to seek accreditation in areas where species specialists could be provided; augmenting home-based care with more central-based facilities; and reducing red tape to facilitate the more efficient transport of animals interstate.

Flexible boundaries

This proposed change to the policy would allow up to 20% of active members of a group to reside outside their group’s boundary without requiring a memorandum of understanding (MOU) with the neighbouring group.

Twenty-eight per cent of comments supported the idea and 16% were critical. Several other respondents requested more detail about the proposal. Those in favour such as Native Animal Rescue Group and Port Stephens Koalas gave their in-principle support to the proposal and said it may attract more members to their group. WIRES Northern Rivers Branch said the initiative may be useful but would need to be supplemented by protocols so that animal welfare is not compromised. Those against included groups such as Wildlife

Rescue South Coast, WIRES and Hunter Wildlife. The rationale for those opposed was that the change is unnecessary and rewards people who do not comply with their group's rules. There was concern that people residing out of boundary would be difficult to monitor and train, and could increase the potential for conflict between groups.

The Department is committed to providing some additional level of flexibility for groups with respect to the management of a small number of their volunteers who for personal or pragmatic reasons cannot live within the boundary of their group. The Department is aware that some groups are refusing to use current MOU arrangements under the policy to enable some volunteers from the adjacent groups to live out of boundary. This has resulted in conflict between these groups.

The Department is also aware that some groups already have active carers residing outside their group's boundary for a variety of reasons with no negative impact on services. The Department will continue to pursue this change to its policy but will consult further with the sector before finalising the proposal.

Centralised facilities and specialist species support

The proposal to explore opportunities for augmenting home-based care with more central-based facilities received cautious support. Respondents stated that new service providers should only be permitted if there is a proven need that cannot be met by existing providers. There was also feedback on the challenges central facilities have with acquiring funding and suitable locations, providing security, regular maintenance and monitoring. The Department agrees with these concerns. It does not intend to fragment services but augment them where needed with facilities that have given due consideration to these challenges.

Interstate movement of wildlife for rehabilitation purposes

There was cautious support for this action to enable accredited groups to move animals interstate without the need for a separate single-use import/export licence. This will benefit groups that operate near NSW borders and have working relationships with places like Currumbin Wildlife Hospital in Queensland, or veterinarians and other experienced wildlife rehabilitators. It will also help expedite responses to wildlife emergencies such as extreme heat events.

Respondents appreciated the intent of the Department to reduce red tape but were concerned about:

- risk of spreading disease and reducing genetic diversity
- lack of accountability and unnecessary movement of animals
- tracking animals and ensuring they are ultimately transferred back to New South Wales.

The Department is aware that a number of groups such as Friends of the Koala and WIRES already move animals interstate without applying for any approval under the existing provisions of the NSW Biodiversity Conservation Act 2016. This change will facilitate the legal movement of these animals. However, groups will be required to demonstrate the need for the approval when they apply for accreditation. The conditions attached to accreditation will ensure that groups keep track of animal movements. The change will not affect the legislative requirements of other jurisdictions.

Ongoing strategic support services

Respondents to this theme were mostly appreciative of the intention of the Department to provide ongoing support to the sector including the provision of insurance payments to members of the NWC. The Department intends to extend this support to all groups once it achieves unification of the sector.

The Department will also continue to provide in-kind support, where possible, through the provision of conference rooms for volunteer training and meetings on a case-by-case basis. These initiatives will be included in the updated strategy.

Implementing, reporting on and evaluating the strategy

One submission requested further information about the timeframe for implementation of the strategy, the method for ongoing engagement with the sector, processes for evaluating effectiveness and a review timetable.

The Department intends to implement the approved strategy over a three-year period. The Department will report progress on actions relevant to the NSW Koala Strategy to the Koala Board and NSW Koala Strategy inter-agency committee. Actions funded through the FNPW business plan will have monitoring and reporting requirements and be subject to independent evaluation by the NSW Environmental Trust.

The Department will also continue to collaborate with the NWC and WIRES during implementation of the strategy.

Supporting documents

Three submissions commented on the review document. These were about specific findings in the review specifically the number of animals rescued and veterinary services sections. One comment requested more data on threatened species rescued by the sector. This will be included within the new annual report. Another comment requested a more detailed quantitative analysis of the contribution of volunteers who remove reptiles including venomous snakes from people's homes. Another questioned the statement that veterinary practices were crucial partners in wildlife rehabilitation, because in their experience many veterinarians were not interested in wildlife.

There were two submissions on the compliance report. One expressed disappointment about the findings on individual licence holder training and noted that access to training for this cohort of wildlife rehabilitators was challenging because they are not attached to volunteer networks or represented on the peak body. The Department will ensure that individual licence holders are given more access to training and networking opportunities when the strategy is implemented.

Key stakeholder views

The views of three important stakeholders in the wildlife rehabilitation sector are highlighted below. They include submissions from the NSW Wildlife Council (NWC), Wildlife Information Rescue and Education Service (WIRES) and the Australian Veterinary Association (AVA). The comments are edited extracts from each submission. Full extracts are available on our website.

NSW Wildlife Council

The NSW Wildlife Council (NWC) is the peak body for wildlife rehabilitation providers and represents about 25 wildlife rehabilitation providers and approximately 55% of the volunteers who participate in the sector. The NWC in its response to the strategy was grateful to the Department for its recognition of the wildlife rehabilitation sector and commended its aspiration to support the work of its volunteers. The NWC stated that a combination of skills and resources are key factors to facilitating continued delivery of volunteer services to the community.

The Department understanding and interpretation of the key issues raised by the NWC in its submission are provided below. A full extract is provided on our website.

Funding

- Significant and direct government funding or facilitated access to grant funding is required to enhance support for volunteers. The NWC notes the Victorian Government commitment of up to \$200,000 each year for facilities and equipment.
- The Department commitment toward maintenance of public liability insurance payments is welcome; however, funding should also be made available for the volunteers' accident insurance component of the existing commitment.
- More detail is required on how the FNPW \$1.2 million in additional funding will be allocated and this should include consultation with stakeholders.

Single wildlife rescue number

- The potential benefits of the single wildlife number are understood, although there does not appear to be a lot of evidence that it is needed in New South Wales. More detail needs to be provided about how the system will work including in areas of overlapping groups and situations where a 24-hour person-answered phone service is not offered to the public.

Peak body

- NWC states it has provided a valuable platform for networking across the sector and delivered improved standards through the development of the Codes.
- The intention that the Department will partner with the NWC in developing a strategic priority plan is useful and can have multiple benefits. Any such plan needs to be supported by additional resources.
- The NWC supports a peak body that includes both the current arrangements and the inclusion of WIRES. It is not supportive of a diluted advisory body model that makes decisions that affect the day-to-day operations of its members; however, it does support an advisory panel that positions the NWC in the mainstream of the environment and conservation sectors.
- Any new service level agreement should include some paid NWC secretariat support.

Accreditation

- NWC supports transitional accreditation if it has a clear intent, is reasonable and flexible, and improves outcomes for wildlife.
- Improved governance and superior processes resulting from accreditation could lead to better management and stop the need for volunteers to affiliate with outside groups.
- The Department should provide examples of best practice in the sector that would meet proposed accreditation standards. A shared resource inventory would be of benefit to the sector.
- Some groups will find the accreditation timeline difficult to comply with because some changes will require the group to hold a Special General Meeting.
- NWC would appreciate more clarification on:
 - what standards will be used during the transitional accreditation period and what will be the minimum benchmark for each standard
 - whether the Department will identify existing documents that meet accreditation standards
 - whether applicants will be able to provide evidence of working toward meeting accreditation
 - whether the standards will change in the following three years.

A more flexible policy framework

- There is mixed support among members for the proposal to make group boundaries more flexible.
- There is concern the proposed actions will increase the administrative and financial burden on NWC members.

Department response

The Department welcomes the constructive feedback provided by the NWC and acknowledges its 14-year tenure as a peak body for the sector and its achievements to date.

The Department has commenced further consultation with the NWC about the strategy, in particular the accreditation process, and has made a number of commitments that address its concerns (outlined in the [accreditation section of this report](#)). The Department is committed to continuing this dialogue with the sector to enable it to smoothly transition to accreditation.

The Department has already outlined its proposed standards for transitional accreditation in the strategy support document [Accreditation of wildlife rescue and rehabilitation service providers in NSW](#). As stated in the NWC submission, the standards are based on good practice already undertaken by the sector. The Department recognises there is currently no universal minimum standard that meets accreditation requirements. This is what the Department intends to develop with the peak body and the sector over the next three years.

The Department welcomes NWC's desire to include WIRES in the peak body; however, it needs to discuss with WIRES what changes to its governance arrangement are needed to achieve this outcome. The Department is committed to acting as a broker between the NWC and WIRES. If this is unsuccessful, the Department intends to pursue the strategy action of establishing an advisory board.

The Department understands that the single wildlife rescue phone number and the introduction of flexible group operating boundaries are contentious issues for NWC members. The Department intends to further discuss these initiatives with the sector before their implementation.

The Department will update the strategy to give further detail about the future FNPW funding initiative and has already initiated discussions with the NWC about the nature and scale of funding. The Department will continue to fund NWC members' insurance commitments as per current arrangements and provide the NWC with in-kind support through the provision of rooms for its meetings.

WIRES

The [Wildlife Information Rescue and Education Service](#) (WIRES) is the largest volunteer wildlife rehabilitation organisation in New South Wales and its branch coverage is extensive across most of the State. The WIRES Chief Executive Officer (WIRES CEO) made a submission to the strategy as did its Northern Rivers Branch and Central West Branch. Several individual members also made comments, some of whom requested to remain anonymous. This section provides organisational feedback from the WIRES CEO.

The Department understanding and interpretation of the key comments and issues raised by WIRES in its submission are provided below. A full extract is provided on [our website](#).

Overall comments and vision

- WIRES would be more comfortable if there was a clearer indication of the substantial additional resources necessary to meet intended outcomes in the strategy.

- A more targeted strategy supported by resources commensurate with the objectives identified would have a much better chance of achieving real improvement.
- The emphasis of the strategy on the sector supporting itself and taking on more specialised tasks previously undertaken by the Department demonstrates a lack of understanding of the limitations of working within the not-for-profit sector.
- The Department could have and should have already created a set of standards for the sector; instead, inconsistent decision-making, lack of compliance effort and direct funding to support services has negatively impacted the sector.

Planned actions

- WIRES questions which actions the Department intends to do itself, how many it expects the sector to undertake and what reporting requirements are expected from the sector.

Facilitating a unified peak body and new strategic agenda

- WIRES would discuss a more representative peak body provided WIRES representation is commensurate with its membership. A new peak body would be supported if it met certain goals (outlined in the submission).
- The 'new strategic agenda' outlined in the strategy has minimal resources attached to it and likely to increase the reporting burden on the sector.

Standards of care and training

- The short video action in the strategy could be useful. WIRES already has a Welcome Kit.
- WIRES strongly supports the \$1.5 million in additional wildlife care training for vets and vet nurses. An equivalent financial commitment to training within the rehabilitation sector would demonstrate that carers are equally valued.
- WIRES is interested in the action to train mentors and hold regional workshops. These could be valuable initiatives.

Promoting stronger compliance

- WIRES supports the goal of improving standards of care within the sector. There are resource implications to establishing an effective audit program. Meaningful support from qualified Department staff will be essential. There will be substantial travel and accommodation costs.

Single wildlife rescue number

- WIRES is strongly opposed to this proposal and claims it directly undermines the organisation. It is claimed there has been no consultation with WIRES about the proposal and for it to be effective, the Department will need to establish and maintain its own call centre.
- WIRES states it is highly irresponsible of the Department to make a public commitment to this idea without any plan to support current call volumes and likely increase in calls as a result of the new service. WIRES states it will not accept calls passed on from the proposed government number.

Accreditation

- It is not immediately obvious how accreditation will be different to licensing. It is also unclear how accreditation will reduce red tape or provide a more flexible framework for organisations to operate in.
- WIRES is concerned that accreditation will lead to increasing fragmentation in the sector if the Department supports the creation of new groups.
- Transitional accreditation will be a box-ticking exercise and will remain a box-ticking exercise into the future.
- Developing standards where they don't already exist may be helpful.
- WIRES does not support the Department attempting to devolve responsibilities such as dealing with aggressive animals to the volunteer sector as proposed in the accreditation document.

Out of area representation

- WIRES does not consider greater flexibility is needed or that members should be allowed to operate outside licensed boundaries, even under an MOU. The proposal will likely result in poor animal welfare outcomes and increased conflict between groups.

Preference for central style facilities

- WIRES would like to see a much more careful discussion of the pros and cons of this proposal.

Import/export interstate

- WIRES considers this requirement needs accountability and careful monitoring. It has the potential to spread disease and reduce genetic diversity.

Ongoing strategic support services

- WIRES seeks more information about the business case developed by the FNPW and if changed administrative arrangements for the the Department will impact commitments made in the NSW Koala Strategy and this strategy.

Department response

The Department would like to thank WIRES for its submission and support for a number of actions in the strategy. WIRES is an integral and important part of the wildlife rehabilitation sector and its views are important to the Government. The Department, however, respectfully disagrees with several of WIRES' observations and comments and our response to matters raised are provided throughout this document. We will aim to correct misconceptions and address many negative perceptions in the submission.

As stated in the [Summary](#) to this report on submissions, the challenge for the Department has been to develop a strategy that recognises the significant disparity in membership size, resources and geographic location of wildlife rehabilitation organisations across New South Wales. The actions presented represent the outcomes of extensive consultation across all stakeholders with the goal of ensuring that the whole sector has capacity to meet agreed standards of operation and is sustainable into the future.

The Department of Planning, Industry and Environment will continue to implement relevant actions in the NSW Koala Strategy and this strategy and looks forward to collaborating with WIRES during its implementation.

Australian Veterinary Association

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. The AVA states in its submission that the strategy and support documents provide extensive, useful and important information about the current state of the wildlife rehabilitation sector and the role of veterinarians. The AVA considered the strategy to be well developed, evidence-based and that the five focus areas covered the main areas of concern.

The Department understanding and interpretation of the key issues and recommendations raised by the AVA in its submission are provided below. A full extract is provided on our website.

- The aims of the strategy should be adequately resourced for implementation and there needs to be good oversight. Information about changes implemented under the strategy should be communicated to veterinarians in consultation with the AVA.
- There should be a funding source established to compensate vet practitioners for the cost of treating wildlife. The NSW Government should put aside a fund to pay for vets' drug and treatment costs.
- The funding for professional development for veterinarians is welcome. This should be well resourced and delivered in collaboration with the AVA.
- The introduction of accreditation underpinned by consistent standards of operation for volunteer organisations is a positive move toward improving standards of care. The requirement for wildlife rehabilitators to have systems in place for ensuring they engage with veterinarians is an excellent initiative.
- The introduction of a single wildlife number is a good initiative and will lead to better cohesion across the sector.
- Reference to record keeping for the veterinary profession is already a requirement under the NSW Veterinary Practice Act 2003 and should be deleted from the strategy.
- Post-release survival of rehabilitated wildlife is an ongoing animal welfare issue. Collection of data on post-release survival should be a priority and more research should be done for wildlife species beyond koalas.

Department response

The positive response of the AVA to the strategy and support documents and its ongoing interest in its implementation is welcome. The Department will also continue to collaborate with the AVA on actions that involve the veterinary profession in New South Wales.

The Department will update the strategy to include actions funded by the FNPW. The funding package will have a small grant component for veterinary practices to help offset the costs of treating wildlife. The Department looks to assistance from the AVA to leverage strategic support from the state and commonwealth governments for ongoing financial assistance for the veterinary profession.

The Department understands that the AVA, Veterinary Practitioners Board of NSW and Veterinary Nurses Council of Australia are part of the network of stakeholders who will be consulted during development of the professional development training for veterinarians and veterinary nurses.

The Department does not intend to increase the reporting requirements of veterinary practices. It does want to improve the quality of data collected by the wildlife rehabilitation sector. Volunteers have commented that the cause of injury and rescue location of animals are sometimes not documented by vet practices. The professional development training action for veterinary professionals will include a component on the sector's reporting obligations. This will help improve consistency in data collected for the sector by veterinary practices.

The AVA also requested some minor wording changes which will be included in the final version of the strategy.

Appendix A: List of submitters

Table 1 Submissions received in response to the strategy and support documents
Confidential submissions are marked 'Anonymous'.

Number	Name	Representation
1	Charles de Chelard	Individual
2	Anonymous	Government
3	Anonymous	Individual
4	Ian Jackson	Individual
5	Friends of the Koala	Wildlife rehabilitation organisation
6	Anonymous	Individual
7	Philip Machin	Individual
8	Eira Battaglia	Individual
9	Anonymous	Individual
10	Australian Veterinary Association	Peak body – veterinary
11	Barbara Hands	Individual
12	Wildlife Rescue South Coast	Wildlife rehabilitation organisation
13	FAWNA	Wildlife rehabilitation organisation
14	Leigh Mansfield	Individual
15	Anonymous	Individual
16	Anonymous	Individual
17	Northern Rivers Wildlife Carers	Wildlife rehabilitation organisation
18	Anonymous	Individual(s)
19	Anonymous	Individual(s)
20	Native Animal Rescue Group	Wildlife rehabilitation organisation
21	Two Green Threads	Not-for-profit
22	Patricia Edwards	Individual
23	International Fund for Animal Welfare (IFAW)	Not-for-profit
24	Wildcare Queanbeyan Inc.	Wildlife rehabilitation organisation
25	Lorraine Vass	Individual
26	WIRES	Wildlife rehabilitation organisation
27	WIRES Northern Rivers Branch	Wildlife rehabilitation organisation (Branch of WIRES)
28	LAOKO	Wildlife rehabilitation organisation
29	Julia McConnell	Wildlife rehabilitation licensed individual
30	Wildlife Aid	Wildlife rehabilitation organisation
31	NSW Wildlife Council	Peak body – wildlife rehabilitation
32	Hunter Wildlife (Native Animal Trust Fund)	Wildlife rehabilitation organisation

NSW Volunteer Wildlife Rehabilitation Sector Strategy: Submissions report

Number	Name	Representation
33	Sydney Metropolitan Wildlife Services	Wildlife rehabilitation organisation
34	Port Stephens Koalas	Wildlife rehabilitation organisation
35	Louise Krieger	Individual
36	NSW Young Lawyers	Not-for-profit
37	Christie Jarrett	Individual
38	Anonymous	Individual
39	Anonymous	Individual
40	Gary Flaws	Individual
41	Tree of Compassion	Not-for-profit
42	Anonymous	Not-for-profit
43	Sentient	Not-for-profit
44	Belinda Furlonger	Individual
45	Geraldine Pearson	Individual
46	Sharon Small	Individual
47	Richard Woodman	Individual
48	Anonymous	Individual
49	Northern Tablelands Wildlife Carers	Wildlife rehabilitation organisation
50	Peggy McDonald	Individual
51	Diane Hinton	Individual
52	Michelle Toms	Individual
53	Shane Crowhurst	Individual