

To Whom It May Concern,

I am deeply concerned about some of the issues raised in the Flying-fox Camp Management Policy Review 2014. Fruit bats are important forest pollinators that are a threatened species. The reason that they are coming into increasing conflict with humans is from land clearing for residential subdivisions and horticultural/agricultural activities has deprived them of habitat.

In the Executive Summary the draft policy states that the "overriding purpose" of the policy is to minimise health impacts of flying-fox camps on people. Yet the Office of the Environment & Heritage (OEH) and NSW Health both say that Flying-fox camps present a very low health risk to start with. Flying foxes present a lower risk than other animals found in urban and peri-urban environments; Animals such as horses, dogs, cats, cattle, sheep and goats. The seriousness of the animal welfare issues and conservation issues created by bat camp dispersals are an over-reaction to a very low health risk. By emphasising this point in the summary it is giving validation to false claims in the media about the health threat posed by Fruit bats

Secondary purpose seems to be concern over damage to horticultural crops. While this is not openly stated, it is clear from the section entitled "Is Shooting of Flying-foxes allowed?" that this is an objective as it does not relate to human health. Studies undertaken in the last decade have shown that shooting is seldom effective in the short term and never effective in the long term as a crop protection method.

We grow our own fruit crops which have occasional visits by fruit bats we accept that if we don't want the bats to access fruit that we will need to net those trees. Interestingly we have found that when native trees are flowering fruit bats will not bother our fruit trees as they prefer their native food. In years when Bloodwoods have had a good flowering season fruit bats have not touched our Mangos. Why not encourage people to plant native food sources for the bats which they prefer over exotic crops? Shooting is cruel & inhumane & should be banned immediately

Section 1 (p1) & Section 2 (p5) - Objectives of the Flying-fox Camp Management Policy

The third dot point says that one objective is to "provide a balance between conservation of flying-foxes and their impacts on human settlements". The policy fails to provide a balance as it is heavily biased in favour of reducing impact on humans, with very little contribution to conserving flying foxes.

Another objective is to "enable land managers and other stakeholders to use a range of suitable management responses to sustainably manage flying-foxes". The remainder of the document only talks about land managers, so the reference to "other stakeholders" is confusing and inconsistent in the context of that statement.

Either reference to “other stakeholders” should be deleted, or some explanation is provided in the policy as to the identity and role of the other stakeholders.

The final objective noted is to “enable long term conservation of flying-foxes in appropriate locations by encouraging land managers to establish and protect sufficient food supplies and roosting habitat.” The policy offers suggestions, but does not indicate who is responsible for the implementation, nor how they will be implemented. Nor are the suggestions embedded in the processes, roles or responsibilities in the policy. Unless these are strengthened, this policy will not deliver solutions that will genuinely contribute to conservation: A significant failure given the statutory responsibility of the OEH to conserve NSW wildlife.

Section 3 (page 6) - Managing flying-foxes

- a. The draft policy states proactive management is recommended where flying fox camps are “causing issues through noise, odour, prevalence of flying-fox droppings or health impacts (including mental health)”. The way this is currently stated is too subjective. For example there is consistent noise in urban environments including road noise, weather, air-conditioners, barking dogs and so on. It is unreasonable to expect animals to be silent, whether they are bats, birds, dogs or farm animals. As with other legislation, pro-active management should be related to excessive noise, not just “noise”.
- b. The same argument is true for odour; smells from car exhaust, garbage and industry are considered acceptable and while a strong odour from an adjacent roost may be overwhelming, a slight odour from 500 meters away might be acceptable.
- c. Land managers should also consider the number of people impacted. If only one or two people are effected it may be more sustainable and cost effective for the effected properties to (for example) install double glazing/ covered areas for vehicles than to spend tens of thousands of dollars of public money on a dispersal that may or may not succeed.
- d. Regarding the issue of flying fox camps causing “health impacts (including mental health)”, the policy already notes that the risk of Lyssavirus transmission is minor. Media reports often include people talking about a range of health impacts from asthma and stinging eyes through to flu-like symptoms. These often turn out to be the effects of some other influence – such as the flowering that has attracted the bats to the area. If Health concerns are to be a criteria, they need to be assessed as genuine health issues, and not unsubstantiated claims.

Section 3 (page 6) Creation of Buffers (Level 2 actions)

As written level 2 action could be misused to effect a level 3 action. As with the previous point, the standard conditions (Appendix B) should clearly state that harming flying foxes could be subject to fines under the NPW Act, the POCTA Act, and depending on the species, possibly the TSC Act and the EPBC Act. As activity level 2 actions will cause disruption (albeit at the fringe of the camp), they should also be restricted in the same way as level 3 actions in as much as the actions are not to be undertaken in a camp between August and May, when female Flying foxes will be in the late stage of pregnancy or nursing dependent young.

Section 3 (page 7) Camp disturbance or dispersal (Level 3 Actions)

The draft policy says “Land Managers should consider appointing a coordinator and working with other flying fox experts”. This wording infers the use of a coordinator

optional. The financial constraints affecting most agencies at State and local levels is likely to mitigate against Land Managers employing / contracting coordinators, which will weaken the management, increase the risk of failure and lead to inconsistent outcomes. It would be a far stronger policy if rather than saying “should consider using” a coordinator, the policy should say “Land managers must appoint a coordinator who is appropriately skilled as a project manager, has a detailed knowledge of flying-foxes, has a working understanding of OAH and (Commonwealth) Environment Department requirements and ideally have experience with the process of camp dispersals.

In this section the draft policy states that Dispersals are not recommended “when uncharacteristic seasonal climatic conditions have resulted in a large proportion of the NSW flying-fox population temporarily occurring in one or a few local camps”. This is too complex and assumes that the land manager has knowledge of those environmental issues. It would be clearer if the policy simply said “when conditions are such that a large proportion of the NSW flying-fox population temporarily occurring in one or a few local camps...”.

Flying foxes have been known to relocate to camps overnight when disturbed – sometimes quite a few kilometres apart. This section needs to be rewritten to be clear and unambiguous.

Section 5 (Page 10) Engaging the community

Use the stakeholder engagement section to educate the local community not only about the importance of conserving flying foxes, but to explain that most dispersal attempts to date have not succeeded in the long term despite hundreds of thousands of dollars being spent on the attempts.

Section 6 (Page 11) Adopting a long-term objective to support habitat creation

This is also a positive initiative and must remain in the policy. The destruction of flying-fox habitat is believed to be a significant factor contributing to the use of urban areas as flying-fox camps. As with the recognition of historic usage sites it will be difficult to enforce – but worthwhile in the long term. To be truly effective this needs to be more than policy – it needs to be enacted in legislation.

Also no development should be allowed in proximity to any existing Flying Fox Camp (as has occurred in Coffs Harbour where over the past 15 years residential development has occurred adjacent to a camp)

Conclusion

The policy is fundamentally flawed in that:

- a. The health risks posed by flying-fox roosts do not justify the actions of the policy
- b. There is no genuine argument for allowing the shooting of flying-foxes to continue until 2020. Shooting is unnecessary and ineffective. Netting is not only more effective, it also protects against lorikeets and some insect pests. Farmers have been given ample warning that shooting was to be phased out over 4 years. This approach is archaic, unethical and should be banned immediately.
- c. The policy sets a number of objectives, but the weak wording and anticipated lack of compliance activity will not genuinely meet those objectives.

d. The policy talks about sustainability, but there is not enough in the policy to deliver a genuinely sustainable outcome. It is not a balanced approach as it places human convenience and profit above conservation.

e. By allowing shooting, the policy condones animal cruelty. There is ample scientific evidence already provided to the Government that it is not possible to kill flying-foxes humanely by shooting. The practice is inherently cruel and unethical.

Threatened species deserve our protection to avoid eventual extinction; with the loss of Fruit Bats we would also lose one of our most important forest pollinators and with it the further decline of already degraded ecosystems.

Yours Sincerely

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