Flying-fox Camp Management Policy 2014: Consultation draft

Submission by:

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Why is a Victorian organisation making this submission?

Victoria is home to colonies of Grey-headed flying fox (mainly on the coast, but inland as far as Bendigo) and Little red flying fox (mainly in the Murray River area, but occasionally as far south as Melbourne). The grey-headed flying fox (*Pteropus poliocephalus),* which is listed as vulnerable to extinction under the Victorian Flora and Fauna Guarentee Act 1988, is a single population of animals ranging from southern Queensland to South Australia with animals moving between states. Due to the highly mobile nature of these animals, the policies and actions in one state therefore affects the population of the animal in other locales.

General Comments

A policy framework for the consistent development of flying-fox camp management plans is desirable, as is the provision of resources and an approval/licensing system.

Positive aspects of the policy include:

1. Recognition of the important environmental role of flying foxes in pollination and seed dispersal
2. The stratification of actions into three levels
3. The requirement of a formal planning and licensing process

Negative aspects of the policy include:

1. Overemphasis on health risks despite acknowledged very low actual risk
2. The overly long period of licencing approval for actions (5 years)
3. Limited consideration of animal welfare issues

The issue of health risk

The draft plan specifies that "The overriding purpose of this policy is to minimise health impacts of flying-fox camps on people". The health risks to humans from flying-fox camps is widely acknowledged to be extremely low. The serious health risks are from Australian Bat Lyssavirus and Hendra virus. These have a low likelihood of occurrence, but can have serious consequences. The risks associated with the former can be eliminated by educating the public to not handle bats and by pre and/or post-exposure vaccination. Risk of Hendra virus transmission via horses can be reduced by following recommended risk reduction practices, and eliminated by vaccination of horses. The remaining risks (noise and amenity issues) are of higher likelihood in the immediate vicinity of camps, but of lesser consequence or impact.

An analysis of the health risks/costs (Appendix A) shows that even when risk is set at low (rather than very low), combinations of risk reduction and cost of correction yield an action indicator between 'low priority' and 'future plans'.

If the real overriding purpose of the policy is to minimise health impacts on people, then it should include a formal process of risk-cost evaluation in the process of appying for a licence, and greater emphasis on the actual (very low) health risks. What would follow from this would be very rare granting of licences to interfer with flying fox camps, given the very low risks to human health.

If this is not the true overriding purpose of the policy then this statement should be revised. It seems that the purpose is rather to deal with inconvenience/annoyance, rather than with threats to human health, which are often more perceived than real.

The *perception* of health issues must be separated from *actual* health issues. In communities where there is unmoderated alarmism and misinformation about flying foxes there is the likelihood of false attribution of a range of symptoms to flying foxes, and the 'social communication' of these perceptions. A similar effect can be seen with 'wind turbine syndrome', which is thought to be a form of 'nocebo' effect (Chapman, St George, Waller & Cakic, 2013).

Risk reduction from appropriate netting of domestic fruit trees

Thousands of native animals every year, primarily flying foxes, become entangled in nets draped over backyard fruit trees. This situation poses a risk to the householder, who may be distressed by the suffering of the trapped animal and attempt to free it, risking scratching/biting and having to subsequently undergo the post-exposure vaccination schedule. It also poses a risk to the wildlife rescue volunteers (mainly women) who are often called upon to deal with the situation, which often requires climbing ladders, sometimes at night. Most animals do not surive entanglement as the lacerations are often very severe, and those that do usually require extended veterinary care and rehabilitation, the cost of which is born by the wildlife rescue and care volunteers.

Local Councils should be encouraged in the policy to enact regulations to ensure that only wildlife safe nets are used on domestic/backyard fruit trees. Wildlife safe nets are those that you cannot poke a finger through.

Managing flying fox camps

Level 1 camp management actions

The policy should qualify that mowing of grass, removal of tree limbs/trees are only appropriate in circumstances where lawns/paths are located under roost trees. Another appropriate level 1 action would be to re-locate walking paths so that they do not pass under roost trees.

Level 2 camp management actions

Creation of buffers is desirable only where the camp does not predate human settlement. Land managers should not permit development of land close to flying fox camps.

Clearing or trimming of canopy trees at the camp boundary to create a buffer should only be permitted on the boundary immediately adjacent to residences, and should be accompanied by expanding suitable habitat on the side/s of the camp most distant to dwellings.

Level 3 camp management actions

The document is suitably cautious about the potential for adverse outcomes from attempts to disperse and relocate flying fox camps. However, there are no mechanisms required to be put in place to ensure that inappropriate dispersals are not undertaken, with resulting adverse outcomes relating to animal welfare, species conservation and dispersing camps to even less desirable locations. The wording that "land managers should consider appointing a coordinator and working with other flying-fox experts" is insufficient and will likely lead to a 'free for all' approach to camp dispersal with resulting adverse outcomes.

To ensure compliance the planning process for any dispersal should require a planning committee that must include:

- an expert on flying foxes,
- a representative of the RSPCA, and
- a representative from a local wildlife care organisation

In addition, the current wording that "dispersal is not recommended…" (p.7) under four conditions, should be strengthen to read "dispersal is not permitted…".

Shooting of flying foxes

Shooting of flying foxes should not be permitted under any circumstances. There is a lack of evidence that shooting is an effective method of crop protection, and strong evidence (Divljan, Parry-Jones & Eby, 2011) that shooting results in unacceptable suffering to the animals, and the resulting starving to death of dependent young. Another compelling reason for a complete prohibition on shooting of flying foxes is that compliance with permits is impossible to verify. In Victoria no permits to shoot flying foxes are issued.

Netting of commercial crops protects against fruit damage by bats, rats, possums, birds,hail and sun.

Steps in developing a camp management plan

There are a number of areas of the policy that should be amended to ensure management plans that are based on valid and realistic assessments of the problem and potential solutions.

There is currently no requirement in preparing the plan for Land Managers/Local Councils to engage suitably qualified and unbiased persons to conduct an assessment of the camp and the impacts on local residents. The identification of alternative or augmental solutions to individual residents' problems should also be required as part of the evaluation. Typically there are only a small number of residents who experience living near a flying fox camp as seriously problematic. To some extent residents' concerns and anxieties can be ameliorated by education and accurate information to counteract historical fears and persistent myths, such as:

1. flying foxes pose a serious health risk
    a. Serious health risks are extremely low and can be completely avoided by not handling flying foxes and taking prompt action if inadvertently scratched or bitten

2. the smell in a flying fox camp is from faeces
    a. The source of the typical odour associated with flying fox camps is not from faeces, but from the males scenting their territory using scent glands
3. flying foxes are 'breeding out of control'
    a. An increase in numbers in a camp do not indicate overbreeding as flying foxes have very low reproduction rates. The numbers in the camp will vary considerably across the year and across years and mainly depends on local food availability.
4. flying foxes destroy food crops
    a. The preferred food of flying foxes is the nectar and pollen of native trees. With loss of habitat from land clearing and failure of traditional food sources flying foxes will opportunisically eat commercial and backyard fruit. However, losses to birds, rats, possums and hail are likely to be higher. Commercial crops are best protected by commercial netting, and backyard fruit trees by wildlife safe netting. Wildlife safe netting has a weave that one cannot poke even a little finger through. The use of netting with a wider apperture can result in flying fox entanglement, which brings people into unecessary contact with the animal, and imposes a burden on local wildlife care and rescue volunteers.

Strategies to change negative community perceptions can also be affected by positive education about the animals and their environmental role. High quality wildlife documentaries are available and these should be made widely available to community members. Local wildlife rescure and care organisations are also able to assist with community education activities.

Low tech and low cost but practical assistance to affected residents may also be offered by local councils, such as a regular high pressure cleaning of paths, suggestions for how to protect washing by use of washing line covers, and the simple but practical use of earplugs to avoid sleep disturbance. Noise is quite variable in a flying fox camp and is most noticable during the mating season.

At present the template for developing a plan identifies stakeholders ONLY as those "affected by flying-foxes both directly and indirectly". The examples listed exclude several groups who would see themselves as stakeholders, viz wildlife care and rescue organisations, and environmental and landcare organisations.

A definition of "stakeholders" should specifically include local wildlife care organisations who are well placed to advise land managers on animal behaviour. The wildlife rescue and care volunteers are also likely to be considerably impacted by any camp disturbance as it is they who will be called on to rescue distressed animals and raise orphaned young.

The provision that "a land manager may apply for a licence….to disturb or disperse a flying fox camp before a camp management plan has been completed if there is an immediate and significant issue" (p.12) should be clarified to stipule precisely what is considered an "immediate and significant issue".

Flying fox management plans should be publically available by OEH and a period of public consultation should be undertaken prior to a licence being granted. If objections are received then the applicant must respond to those objections and make adjustments to the plan where appropriate.

Licences for 5 years seem quite generous and provide the potential for 'drift' to actions outside those approved in a management plan. If Licences are to be granted to 5 years then an independent system of monitoring compliance should be in place. There should be a formal system of dealing with complaints relating to camp management and prompt action to deal with serious departures from the approved plan.

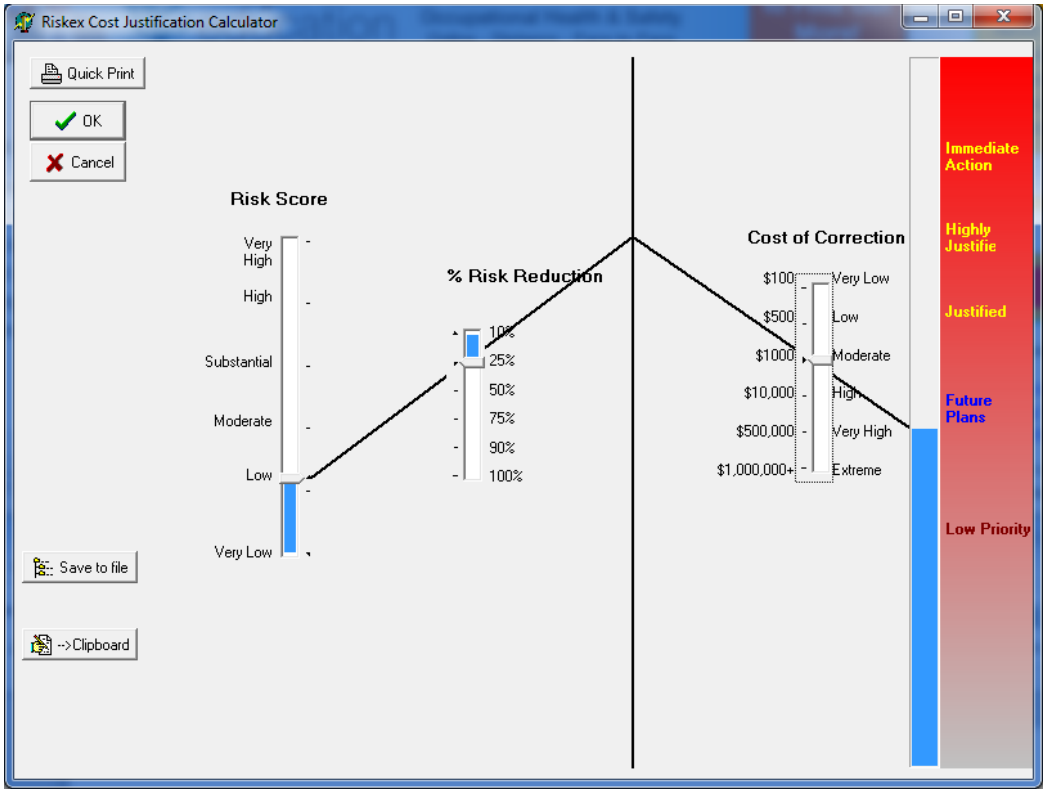
References

Chapman, S., St George, A., Waller, K. & Cakic. V. (2013). The pattern of complaints about Australian wid farms does not match the establishment and distribution of turbines: Support for the Psychogenic, 'communicated disease' hypothesis. *PLOSone* doi: 10.1371/journal.pone.0076584

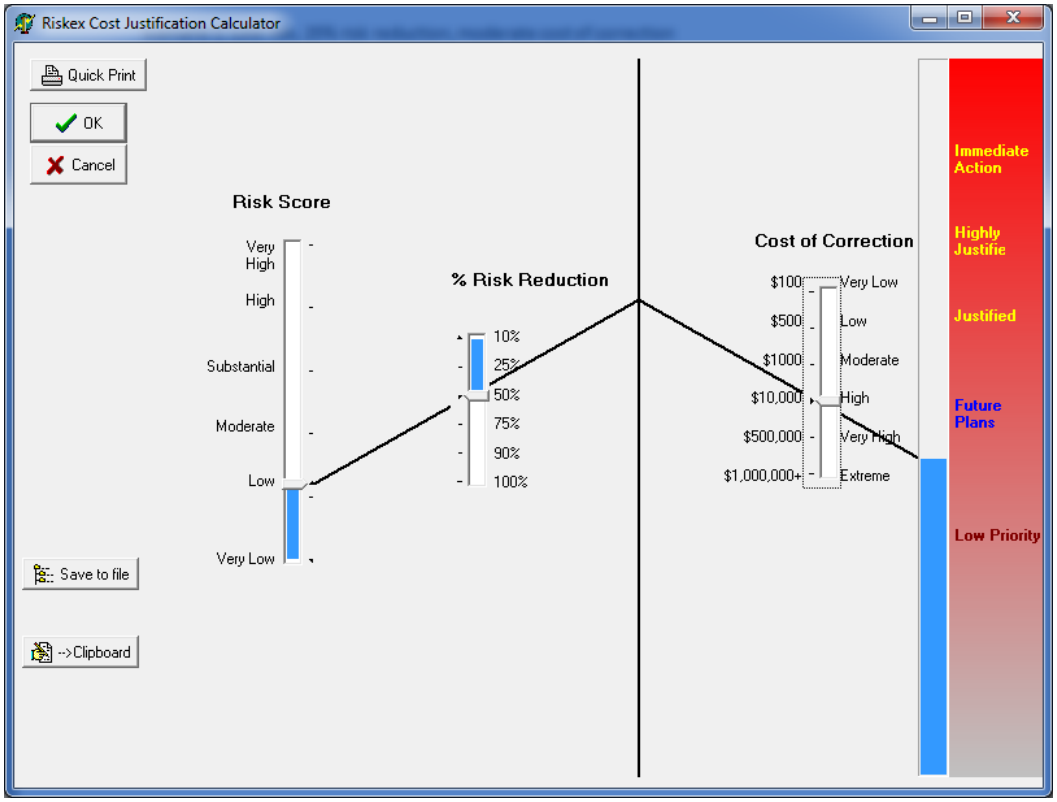
Divljan, A., Parry-Jones, K. & Eby, P. (2011). Deaths and injuries to Grey-headed flying foxes, *Pteropus poliocephalus* shot at an orchard near Sydney, New South Wales. Zoologist, 35(3): 698-710.

Appendix A: Cost Justification Calculator for serious risks

Scenario 1: Low risk, 25% risk reduction, moderate cost of correction

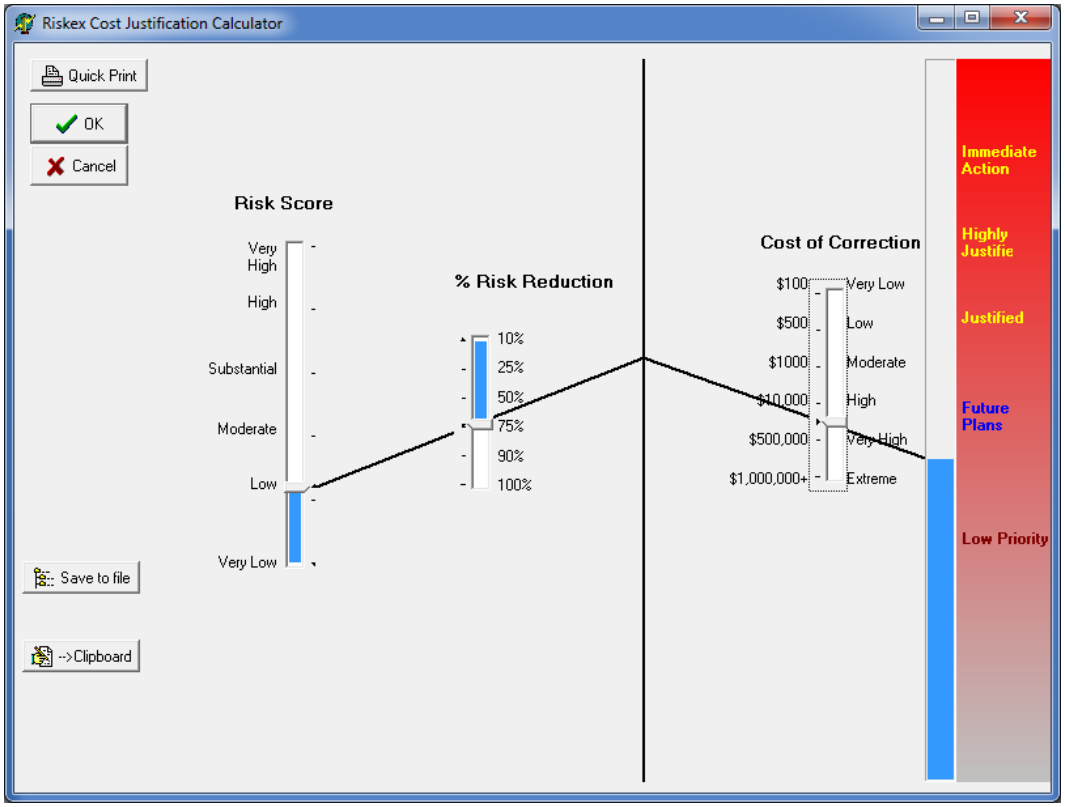


Scenario 2: Low risk, 50% risk reduction, high cost of correction

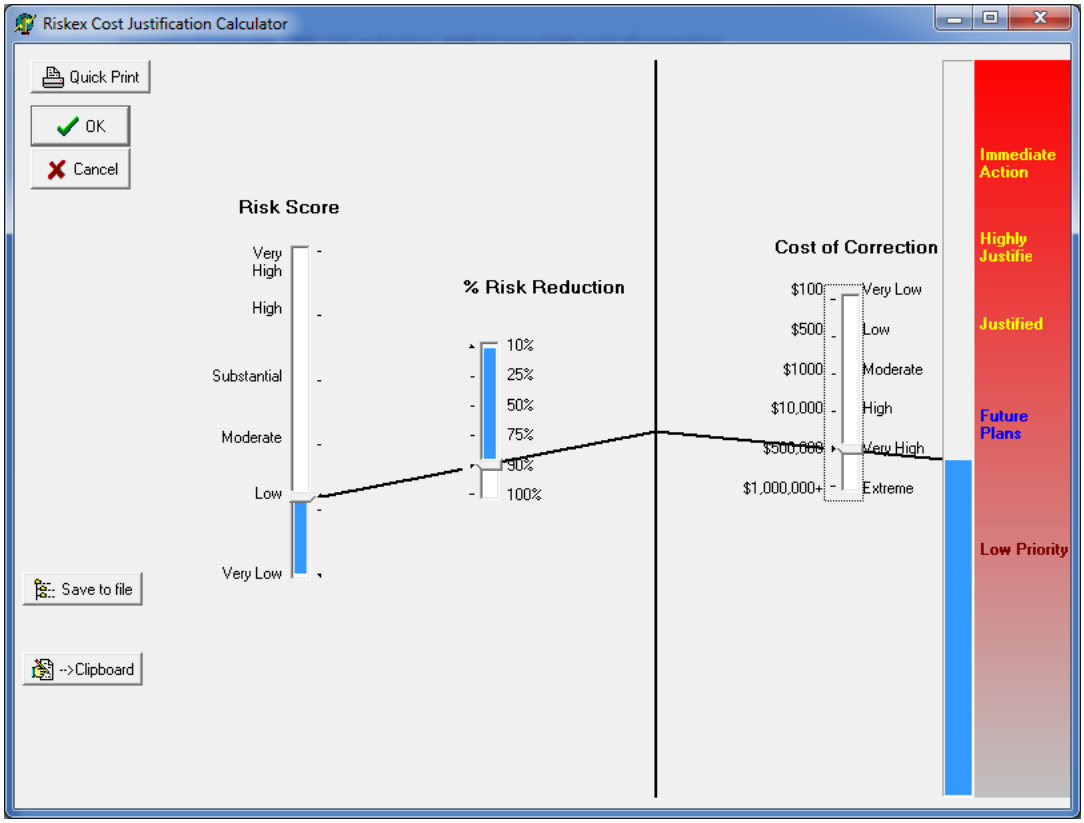


Risk Cost Justification Calculator retrieved from http://www.safetyrisk.net/free-safety-downloads/

Scenario 3: Low risk, 75% risk reduction, High to very high cost of correction



Scenario 4: Low risk, 90% risk reduction very high cost of correction



Risk Cost Justification Calculator retrieved from http://www.safetyrisk.net/free-safety-downloads/