



HUMANE SOCIETY INTERNATIONAL

Australian Office:
PO Box 439 Avalon
NSW 2107
Australia
+612 9973 1728
admin@hsi.org.au
www.hsi.org.au

Head Office:
2100 L Street, NW
Washington, DC 20037
USA
301-258-3010
Fax: 301-258-3082
hsi@hsihsus.org

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Verna Simpson

Flying-fox Camp Management Policy Review
PO Box A290
SYDNEY SOUTH NSW 1232

By email to: flyingfox.policyreview@environment.nsw.gov.au

25 November 2014

Dear Sir or Madam

Re: Flying-fox Camp Management Policy 2014: Consultation draft

Humane Society International (HSI) welcomes the opportunity to provide comments on the consultation draft of the Flying-fox Camp Management Policy. Humane Society International (HSI) is one of the world's largest conservation and animal welfare organisations, with 60,000 supporters in Australia. HSI has long held an interest in the conservation of flying-foxes, having been responsible for the nomination of the Grey-headed flying-fox under federal environmental legislation in 2001, and has actively been working since to secure an end to the shooting of flying-foxes in NSW, as well as promoting conservation and recovery efforts for the species.

We note that the draft camp management policy is intended to be a revision of the 2007 Flying-fox camp management policy. Whilst a revision is no doubt timely, we hold a number of concerns when comparing the two policies. For example the key objective of the 2007 policy was the maintenance of a network of a flying-fox camp and conservation of flying-fox population. In stark contrast the 2014 draft policy instead focusses on health as an 'overriding purpose' (as noted in the Executive summary) and remaining policy objectives appear to be focussed on other human-centric impacts and how to facilitate dispersals. There is no mention of these former (2007) objectives. This is a significant regression in policy objectives and we urge the NSW Government to reconsider the policy's focus.

HSI also has concerns with the attempt to cover issues outside of camp management, in particular health concerns and shooting under the auspices of this policy. HSI believes it would be more appropriate to either refer to these issues and provide links in this policy, or refrain from mentioning them altogether. It is essential that the camp management policy deals only with camp management issues, and not seek to deal with all matters concerning the conservation and management of flying-foxes. HSI recommends that if these additional issues require further addressing by Government, that additional policies be drawn up to address these separately, or the camp management policy be renamed to be more accurate of the broad range of issues it is currently attempting to address.

Overall, HSI is concerned that too great an emphasis in the current policy is based upon trying to 'effectively manage' the flying-foxes, when in many cases other efforts can be made to mitigate against the impact of flying-foxes with the same results. This could include funding alterations to houses such as double glazing, which would minimise the impact on the householder with minimal impact on the flying-foxes. In many cases impacts may only be for a short period of time each year when flying-foxes are in the area.

HSI also considers that any attempt to disperse a flying-fox camp should be considered a level

three activity, which must be accompanied by a full Species Impact Statement due to the likely significant impact of the dispersal on a threatened species. Further information on any triggers that would result in the stopping of any dispersal action whilst it is underway must also be provided in the policy to enable greater understanding of the likely impacts of the draft policy.

Below HSI sets out some more detailed concerns on the draft policy.

Health impacts

HSI does not believe it appropriate for the policy, as noted in the Executive summary, to suggest that the '*overriding purpose of this policy is to minimise health impacts of flying-fox camps on people*' and then to contain no further information at all on these health impacts. Our strong preference as already mentioned is for this reference to be removed, or a short section on health impacts included in the body of the document if this is required with links to the relevant information sources. It is essential if this information is to be included that potential health impacts on flying-fox populations of repeated dispersals are also discussed. This includes the increased stress levels for the flying-foxes making them more prone to shedding viruses which of course is of concern to people. This balance of views must be presented if health impacts are to be addressed by this policy.

It is also HSI's strong preference for reference to mental health to be removed from the policy. This is subjective and an unnecessary qualification of health impacts. If the Government insists on including a section on health impacts in this policy, further detail on how camp management activities can ameliorate any health impacts must also be specified in the policy.

Shooting

HSI does not believe it is appropriate to include any reference to shooting in orchards in the camp management policy. The policy should state the NSW Government position categorically, that shooting is not permitted as a form of camp management, to avoid any confusion that may arise. The current wording does not sufficiently close the door on this option, any introducing the orchard component risks confusing land managers with a policy that is not applicable in managing a flying-fox camp. If shooting in orchards is to be mentioned, full inclusion of all the details must be made, including the conditions around special circumstances under which licences will be issued, and the netting subsidy program that has been established as part of the Government's commitment to end licenced shooting of flying-foxes.

Hierarchy of responses

HSI welcomes the setting out of an apparent hierarchy of actions from level one through to three. However nowhere does the policy explicitly state that levels one and two actions must be undertaken before moving to level three. Given the significance of level three actions, and the likely detrimental impacts on the health and welfare of flying-foxes, it is essential that level three actions are only undertaken once levels one and two have been undertaken, and given time to demonstrate whether they are effective or not. This should be across more than one season. Level one and two actions must therefore be mandatory before land managers are able to licence a level three action.

Five year licensing

HSI understands that the draft policy proposes to licence land managers, such as Councils, to obtain upfront permission to manage a particular flying-fox camp for a period of five years. It is essential that within this five year period annual reports of the land managers actions or activities are reported to OEH, and these reports must be made publicly available on the OEH website. In addition, it is important that any approvals for camp management are site specific. If the flying-foxes move to another location within the Council area, then a separate permit must be applied for unless there is significant proof (such as through radio tracking of flying-foxes) that the bats in the new camp are the same individuals relocated from previous actions.

Long term approach

HSI has consistently advocated for a long-term approach to flying-fox management, and this is

key in the issue of camp management. If flying-foxes continue to be moved around the environment, camp management issues will increase. It is essential that in the policy strong consideration is given by land managers as to a long term approach of how space will be made in the local environment for wildlife including flying-foxes, to avoid a series of camp management or worse, dispersal efforts being undertaken. This will not only be expensive but likely incredibly damaging for the health and conservation of the flying-foxes themselves. Land managers must therefore be advised that the most cost effective mechanism of addressing flying-fox conflicts is to plan now for space for camps, and ensure that development controls are in place to avoid housing and other human development occurring in the vicinity of camps.

HSI supports the suggestion on page 11 that a longer-term strategy be developed and looks forward to further information on the proposed approach. HSI considers that the policy would further benefit from a statement similar to that included in the 2007 policy that proactively encourages the conservation of flying-foxes and their habitat through the maintenance of a network of camps. This will likely need a strong oversight role by the Department due to the nature of flying-fox movements which do not remain within Council areas.

Camp disturbance or dispersal

The policy as currently drafted appears to suggest on page 7 that dispersal is not recommended at key times of the year or in certain conditions, but on page 17 it suggests for these same times and conditions that dispersal should not be undertaken. HSI considers that the advice on page 17 is the more appropriate – that at key times of the year and in certain conditions dispersals should not be undertaken and therefore recommends that language in this section on page 7 be updated to reflect this position. The 2007 policy also appears to be more stringent in its language and number of conditions and this should be reviewed and guidelines updated so that the 2014 policy is more in line with the current (2007) policy.

Other issues

Furthermore, we suggest that the policy would benefit from the inclusion of a definitions page (as in the 2007 policy), which should include definitions of a camp, land manager, Species Impact Statement (SIS) and any other acronyms used.

HSI also draws the Government's attention to the apparent inconsistencies between the Appendices and the text of the policy. These should be reviewed and minimised.

Thank you for the opportunity to provide comments on this important issue. HSI would be happy to discuss any further aspect of this submission further.

Yours sincerely



Alexia Wellbelove
Senior Program Manager