



International Environmental Weed Foundation

ABN 96 105 174 678

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Submission - Flying fox Camp Management Policy - 2014

We believe this proposed policy should be scrapped and flying fox populations should continue to be managed under current applicable legislation. This Policy is fraught with danger of misuse, may send flying fox populations into decline, may extend the loss of urban vegetation and put Councils under greater pressure to act against important local flying fox populations. Please see specific comments below.

Regards

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IEWF & Habitat Network

Expectation of removal of camps from a Council area

Once a Council is provided with a licence the community will have an expectation that all flying fox camps are to be removed from a Council area. Will a license apply to 1 flying fox camp or all current and future flying fox camps within the Council area for the period of 5 years? This policy and licensing will potentially add even more pressure on Councils. People who dislike flying fox for whatever reason are far more vocal than the majority of people who support conservation or do not care either way.

Science, research and monitoring before an application for a licence

How do Councils validly assess the impact on people of a flying fox camp?

There is no valid measurement for assessing the degree of impact on people and to help guide as to whether the level of disturbance to people is sufficient to warrant a Council applying for a licence.

Councils, I am sure, would appreciate having sound data and justification available to NOT apply for a license and to leave a flying fox colony un-disturbed. The proposed levels of camp management plans will ALL disturb flying fox camps, potentially cause distress to the flying fox and also potentially cause more upset to people.



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There should be some scientific basis and monitoring to justify any actions – long before applying for a license and before writing a management plan which through this policy will disturb the camp.

Monitoring and reporting on any actions taken should be rigorous and commence several years before applying for a license. Even all the small decisions taken re management options need to be under an all-over statewide continual monitoring program.

Research and habitat creation BEFORE this Policy is implemented

“Longer-term strategies are needed to reduce the dependency of flying-foxes on resources in urban areas and orchards by conserving and establishing flying-fox habitat elsewhere. Research into appropriate site and species selection to establish alternative habitat for flying-foxes will commence in early 2015 and will include a map to identify priority areas for habitat creation. Increasing habitat in these locations will enhance the conservation of flying foxes while avoiding undesirable interactions with the community.” This research and habitat creation needs to be done BEFORE allowing a policy such as this one to be adopted. Sites and corridors need to be in place BEFORE displacing flying fox camps.

Approval of a license

“OEH considers licence application to determine whether the action is likely to have a significant impact on the species (2 weeks)”

Each individual camp being disturbed or relocated will not have a significant impact on the species therefore every licence application MUST be accepted. This is NOT a good measure for allowing a camp to be disturbed and moved on.

Health impacts on urban populations?

“The overriding purpose of this policy is to minimise health impacts of flying-fox camps on people. The policy will empower land managers, primarily local councils, to work with their communities to manage flying-fox camps effectively.” I have not heard of any health impacts on people in urban areas. Is this a justification for disturbing and or moving a camp?

“Camp management plans will outline a set of camp management actions from low-impact Activities - such as tree lopping to the creation and maintenance of buffers. Camp dispersal can be a successful way to remove impacts on local communities. Camp dispersal will be allowed in accordance with this policy and as part of an approved camp management plan.” Camp dispersal should be a very last action and only if people – are severely affected by the



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camp. This disturbance of a camp will move the potential problem to somewhere else possibly with a greater impact on a large community of people.

“Where flying-fox camps are in close proximity to urban settlements and are causing issues through noise, odour, prevalence of flying-fox droppings, or health impacts (including mental health), proactive management of camps is recommended.” This statement allows EVERY fly fox camp to be classified as being eligible to Proactive management. There are no levels of severity of inconvenience – no noise level testing as when measuring human produced noise disturbance.

Removal of flying fox from threatened species register – keystone pollinator

“National results from the census are available on the Australian Government’s Environment website. These results will also inform future decisions on the continued listing of Grey-headed Flying-foxes under the TSC Act.” This leaves open the opportunity to remove protection and in league with this Policy may leave extermination of camps as an unwanted outcome. From talking to an apple farmers and others at the Royal Easter Show and other events I know that farmers already shoot flying foxes and bury them around their orchards. Only when numbers reach critical limits may they then be protected again.

Bee pollinators are under threat and now we are planning to undertake actions to impact on our flying fox keystone pollinators - which is more important producing food and timber for use by people or protecting people from perceived inconvenience.

All flying fox camps under this policy MUST undergo disturbance

All camps MUST - under this policy - undergo disturbance. There is NO option to allow a camp to remain undisturbed. Councils may be forced to apply for a license but many camps I am sure are well located in their current locations even if some more vocal people find them noisy. Perhaps planting native plant buffers between camps and residences and reducing disturbance would be the best way to manage flying fox camps.

We need to help Councils avoid unnecessary and unscientific management actions.

Level 1 requires ongoing disturbance sawing, mowing, maintenance activities which may relocate the camp to a less suitable location. Chain sawing and removing branches and trees, mowing, clearing understorey etc all create noise and disturbance which will wake flying foxes and make them noisier or more mobile during daylight hours. If the camp is in better bushland this plan may allow removal of understorey which is needed for other native fauna habitat.



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Level 2 encourages the further removal of trees and vegetation and noise disturbance around a flying fox camp. Planting buffers of native vegetation around the camp may be far more beneficial to keep people away from the flying fox camps than any of the level 1 or level 2 actions.

Level 3 is just an extension of level 1 and level 2 – all are designed to disturb and potentially move the camp. The flying fox will relocate and probably relocate to somewhere far less suitable – potentially to some of our rare core urban bushland or into someone's back garden. This level encourages the removal of yet more vegetation. The RFS 10/50 Rule has already had a big impact in some areas of Sydney with unnecessary tree and native vegetation removal. This plan adds to the ease of removal of our urban vegetation (especially trees). Once the flying fox camp moves then a new plan will be drawn up for the new location and then even more vegetation ultimately removed – this is the start of a never ending cycle of harassment of flying fox and tree removal.

“Identifying camp management actions - identifies available camp management actions and categorises them as Level 1 (routine camp management actions), 2 (creation of buffers) or 3 (camp disturbance or dispersal)” – again there is no option to not disturb the camp or to plant a natural vegetation buffer or move a path away from a camp, etc.

Shooting

“Shooting may however be approved in rural and peri-urban areas in some circumstances for use by orchardists to scare or kill animals.” Farmers already shoot flying foxes without licenses. Allowing shooting will accelerate the rate of shooting of flying foxes. Who will monitor and manage how many are shot?

Protect camps through extension of habitat

Councils should be looking to protect and expand bushland around the colonies through use of bush regeneration and revegetation.