

1st December 2014

Flying-fox Camp Management Policy Review
PO Box A290
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Dear Sir/Madam,

Submission on the Draft Flying-fox Camp Management Policy 2014 (NSW)

I am writing to express my concerns in relation to aspects of this draft policy.

Some specific concerns are as follows:

1. It is stated in the draft policy that “The overriding purpose of this policy is to minimise health impacts of flying-fox camps on people”. Given that flying-foxes and their camps are known to pose a very low health risk (as indicated by both the Office of the Environment & Heritage (OEH) and NSW Health) using this as the main purpose for this policy revision is clearly erroneous. While the presence of camps, or sudden large temporary influxes of flying-foxes into camps, can cause distress and potential other health concerns to residents (eg. mental health impacts), I think it is vital to properly assess such concerns and determine that they are genuine and not unsubstantiated claims.
2. The draft policy also says that one of the objectives is to “provide a balance between conservation of flying-foxes and their impacts on human settlements”.
 - Given that this new policy is biased mostly towards the needs of people it will likely contribute little towards flying-fox conservation.
 - Many of the actions proposed in Levels 1-3 of the camp management approach will have/likely have negative impacts on flying-foxes.
 - Even though it is suggested that the policy will “enable long-term conservation of flying-foxes in appropriate locations by encouraging land managers to establish and protect sufficient supplies and roosting habitat” I fail to see how this will be properly achieved. Given that flying-foxes are highly mobile animals, do not observe state boundaries and follow food sources as they appear in the landscape, such an approach ultimately needs to be implemented, managed and enforced at a national level, not just a state level. Even though the state level objective presented in this draft policy is a step in the right direction, I fail to see how ‘encouraging’ land managers to establish and protect habitats will ultimately produce results. Ultimately, flying-foxes and their habitats need to be managed across a greater scale than that of local governments or states in order to ensure their long-term conservation.

- Greater use needs to be made of public education programs and events. When people are better informed they make better choices, and increased knowledge can greatly mitigate conflicts between people and wildlife such as flying-foxes. As with most flying-fox management plans this draft policy is almost completely lacking in regard to public education and engagement initiatives. This should be rectified.

3. I am concerned about a number of aspects of **Section 3 – Managing flying-foxes**.

- The proposal to issue five year licenses is a concern. Such an action will no doubt be problematic without clearly defining the conditions of these licenses, and will be further complicated by the fact that flying-foxes and their camps are notoriously unpredictable.
- I am also concerned with respect to how much monitoring of camp management actions will be undertaken by OEH, and whether there will be any real consequences for those failing to follow the conditions of their licenses. In particular, I am concerned that Level 1 and 2 actions may be used covertly to disperse flying-foxes, and that there will be no consequences for those taking this approach and circumventing the proper process of obtaining approval from OEH.
- I am unsure how land managers can realistically be expected to “consider the behaviours, habitat and food requirements of flying-foxes when developing and implementing camp management plans”, without having extensive up-to-date knowledge of current local flying-fox populations, habitats, flowering/fruiting patterns, weather conditions etc both within and well outside their own boundaries.
- The inclusion of the following statement is also a concern: “Note that a land manager may apply for a licence under section 91 of the *Threatened Species Conservation Act 1995* to disturb or disperse a flying fox camp before a camp management plan has been completed if there is an immediate and significant issue.” I believe there needs to be greater clarification of what this statement actually means, and the kind of situations/camps that could fall into this category.

Overall, I feel that this draft policy needs a greater focus on the long-term conservation of flying-foxes. As a flying-fox researcher, I believe that dispersals are mostly a reactionary management approach that will in no real way solve the long-term issues associated with flying-foxes residing in close proximity to people. Flying-foxes ultimately need to be managed cooperatively at national, state and local scales, with a coordinated approach with respect to flying-fox monitoring, camp management actions and the provision and maintenance of flying-fox habitats.

Yours Sincerely,

Joanne Towsey