

With regard to the draft policy, I would like to make the following comments:

1. the dot points on pages 1. and 5. need to contain reference to animal welfare: it must be a consideration in all aspects of management
2. disturbing/ dispersing should be considered to be a last resort, as it often doesn't have the desired effect for humans or animals (also see 8. below)
3. shooting contravenes animal welfare and should never be allowed; netting for orchardists needs to be strongly promoted and assisted instead
4. all of the measures in the policy to control Flying-fox camps should require management plans
5. management plans should include how to avoid negative impacts such as moving conflict/ problems from one place to another, loss of vegetation, cruelty to animals, damage to an endangered species
6. management plans should be done in three documented stages:
 - a) study the camp
 - b) consult stakeholders
 - c) draw up plan
7. more attention and study needs to be given to avoiding conflict/ problems by keeping any new construction, infrastructure etc. away from camps in the first place, rather than building too close to a camp and then having to address issues later
8. the inclusion of the second case study in Appendix C, Relocation of Grey-headed Flying Foxes from Albury Botanic Gardens, especially given its prominent position at the very end of the draft document, is highly questionable for the following reasons:
 - a) it presents dispersals as a viable option, when in fact they are very often expensive, ineffective or counter-productive, and cruel
 - b) it lacks important information about what makes the new site is more 'suitable' for humans and animals,
 - c) it does not discuss how it was assessed that the animals would go to the 'suitable' site and not to somewhere unsuitable
 - d) it does not discuss whether the 'relocation' techniques used consistent with the welfare of an endangered species