



# Nature Conservation Council

The voice for nature in NSW

Flying-fox Camp Management Policy Review  
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1 December 2014

## Submission on the Flying-fox Camp Management Policy 2014: Consultation Draft

Dear Sir/Madam,

The Nature Conservation Council of NSW (NCC) is the peak environment organisation for New South Wales, representing 130 member societies across the state. Together we are committed to protecting and conserving the wildlife, landscapes and natural resources of NSW.

NCC welcomes the opportunity to provide comment on the draft *Flying-fox Camp Management Policy 2014 (the draft Policy)*. In our view, the draft Policy is too focused on managing the impacts of flying-foxes on human health and communities, rather than addressing the underpinning causes of increased interaction between humans and flying foxes or managing flying-fox camps in order to achieve the best possible conservation outcomes. We are concerned that the draft Policy will not achieve the necessary balance between conservation of flying-foxes and their impacts on human settlements.

### Nature Conservation Council Flying-Fox Policy

In 2010, NCC revised its Flying-Foxes Policy (see **enclosed**). The NCC Policy covers key issues such as:

- The conservation, status, monitoring and recovery of the flying-fox population;
- The conservation of flying-fox camps;
- The interaction of flying-foxes with commercial and private horticulture;
- Education of the community;
- Reducing other causes of flying-fox mortality.

The NCC Flying-Fox Policy sets out our key recommendations for the conservation and management of flying-foxes in NSW and should be considered as part of our submission to the draft *Flying-fox Camp Management Policy 2014*.

Additionally, some of our specific concerns with the draft Policy are outlined below.

### **Conservation of Flying-Foxes**

There are three species of flying-fox in NSW - the Grey-headed Flying Fox, Black Flying-Fox, and Little-red Flying Fox). All three species are protected under the *National Parks and Wildlife Act 1974*. Further, the Grey-headed Flying-fox is listed as vulnerable under the New South Wales *Threatened Species Conservation Act 1995* (TSC Act) and the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*.

Increasing human population, development and urbanisation of rural areas has resulted in the loss of flying-fox habitat and subsequently increased human-bat conflict. While we recognise the need to address concerns relating to human health and disturbance, flying-fox management must recognise the important ecological services that flying-foxes provide and adopt stringent conservation practices to ensure the population integrity of these native species into the future.

We recommend that the 2014 policy include the following paragraph from the NSW Department of Environment and Climate Change *Flying-fox camp management policy* (2007):

*“It is critical that the network of camps used by flying-foxes be maintained across the landscape, allowing the animals to move across their range in response to food availability. Individual camps must therefore be managed from the perspective that they are an integral part of a larger network of camps. Many camps are located in endangered ecological communities (as per the Threatened Species Conservation Act 1995) – appropriate site-specific management options must consider this.”<sup>1</sup>*

### **Risks to human health**

NCC understands the potential risks to human health that may arise from flying-foxes. However we consider that public concern can be misplaced or inaccurate. We are concerned that the strong emphasis on managing the potential risks to human health in the draft Policy does not correspond to the actual risk presented by flying-foxes.

NCC considers that one of the most important aspects of managing risks to human health from flying foxes is education. Information available to people must reach across the broad spectrum of communities affected by and concerned about flying foxes. It should explain the low level of risk of infection and provide information on the practical steps to avoid infection or to treat potential infection. Land managers and local government should be encouraged to develop educational materials that

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<sup>1</sup> See specifically, section 1.1, page 1, available at [www.environment.nsw.gov.au/resources/threatenedspecies/ffcmp07281.pdf](http://www.environment.nsw.gov.au/resources/threatenedspecies/ffcmp07281.pdf)

inform the public about flying foxes and the potential risks to human health. Information, such as links to Fact Sheets provided by NSW Health<sup>2</sup>, should be included in the draft Policy.

It should also be noted that scientists have expressed concerns that stressing flying-foxes may further advance the dispersal of viruses from flying-foxes. Consideration must therefore be given as to whether actions identified in Level 1, Level 2 and Level 3 of the draft Policy may inadvertently increase the chance of human infection.

In regards to loss of health that can be brought about by noise pollution from flying-fox camps, the draft Policy fails to identify potential alternative solutions to the relocation of camps, to reduce noise and smell impacts.

### **Management of flying fox camps**

The Nature Conservation Council Flying-Fox Policy outlines 15 key recommendations for the management flying fox camps.

In particular it is noted that NCC:

- supports requirements to develop Camp Management Plans;
- supports the retention of adequate buffer zones;
- opposes proposals to move flying-fox camps and instead recommends that resources be directed through Camp Management Plans to establish additional roosting habitat on adjoining land to encourage flying-foxes to roost away from sensitive sites such as residential areas;
- agrees that flying foxes must not be disturbed during breeding season, especially while females are in the later stages of pregnancy or feeding young. For the Grey-headed Flying-Fox this is generally between August 1 and April 30. While this is proposed for Level 3 actions, NCC strongly urges that any Level 1 or Level 2 actions undertaken in conjunction with a Camp Management Plan that may inhibit or affect habitat in anyway be subject to the same regulation.

Further, NCC strongly recommends that if Level 3 action (dispersal) is approved, it should be monitored and publicly reported. Monitoring and documentation should follow Step 9 in Section 6 of the Department of Environment and Climate Change NSW 2007, *Flying-fox camp management policy*<sup>3</sup>.

### **Shooting of Flying-foxes**

NCC does not support shooting or other lethal methods of flying fox control. The inclusion of shooting in the draft policy as a potential option for rural or peri-urban areas is in contradiction to the conservation of flying-foxes, and in particular, the vulnerable grey-headed flying fox. NCC strongly urges that this be removed from the policy as an option for any Camp Management Plan. We note that the NSW Licensing Review Panel concluded (in part) in 2009 that the animal welfare issues that result from shooting as a method of mitigating crop damage caused by flying-foxes are unacceptable ethically and legally.

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<sup>2</sup> See [www.health.nsw.gov.au/environment/factsheets/Pages/flying-foxes.aspx](http://www.health.nsw.gov.au/environment/factsheets/Pages/flying-foxes.aspx)

<sup>3</sup> Above No. 1.

## Restoration and conservation of flying-fox habitat

The draft Policy acknowledges that loss of foraging and roosting habitat has meant that flying-foxes increasingly occur in camps in urban centres. This has led to increased interaction between humans and flying foxes. NCC is supportive of restoring and conserving both roosting and foraging habitat, with responsibility allocated to land managers/ local councils. We also acknowledge the draft Policy's long-term objective to support habitat creation and recommendation that research into appropriate site and species selection to establish alternative habitat should be undertaken as soon as possible.

We note that NCC's Flying-Fox Policy provides a number of recommendations for restoration and conservation of flying-fox habitat including:

- the conservation on both public and private lands of native vegetation communities which provide foraging habitat for flying-foxes, especially the grey-headed flying-fox;
- the incorporation of locally native flying-fox diet species into regeneration and replanting plans / programs for restoring native vegetation on rural lands especially in the coastal zone and western slopes;
- the conservation of locally native flying-fox diet species in urban areas in Local Environment Plans (LEPs) and other mechanisms.

## Conclusion

As outlined above, NCC considers the draft Policy to be too focused on managing the impacts of flying-foxes on human health and communities. We are concerned that the draft Policy will not achieve the necessary balance between conservation of flying-foxes and their impacts on human settlements.

NCC believes the identification and protection of important flying-fox habitat, better public education, and implementation of stronger legislation and camp management policies are integral to the recovery of these species and the maintenance of the vital ecological services they provide.

The NCC Flying-Fox Policy sets out our key recommendations for the conservation and management of flying-foxes in NSW and should be considered as part of our submission to the draft *Flying-fox Camp Management Policy 2014*.

Yours sincerely,



Kate Smolski  
Chief Executive Officer