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Flying-fox Camp Management Policy Review
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By email flyingfox.policyreview@environment.nsw.gov.au

29.11.14

To whom it may concern

Re: Flying-fox Camp Management Policy: 2014 Consultation Draft.

Wildlife SOS is an independent, not-for-profit organisation founded in the Clarence Valley, in northern NSW. We work with individuals, community groups and government to achieve positive outcomes for native wildlife.

Our main strategy is providing education to raise community awareness of our native animals and the habitat in which they live. We have also been involved in wildlife monitoring programs and scientific research.

Flying-foxes are a particular focus and some members of Wildlife SOS have been actively involved with flying-fox issues for over two decades.

Since 2010 Wildlife SOS has been a member of the Maclean Flying-fox Working Group [FFWG]. The FFWG is comprised of representatives from government and the community, and has overseen the development and implementation of the Maclean Flying-fox Management Strategy.

The Strategy aims to reduce conflict between affected landholders and flying-foxes in an ecologically sustainable way using best management practices and sound scientific knowledge while maintaining compliance with relevant legislation and planning provisions.

With input from a wide range of stakeholders the FFWG identified a comprehensive list of issues and possible solutions, a management regime and desired outcomes. This was followed with an extensive public consultation phase. The Maclean Flying-fox Management Strategy was then formally adopted and implementation continues to the present time.

Our experience, and involvement in both the 'before' and 'after' phases of the process of developing a Flying-fox Camp Management Plan, forms the basis of this submission.

1. The Consultation Draft aims to be '*clear and concise*' and to provide '*advice and guidance to assist the community, land managers and government to work together to manage Flying-fox camps*', but there are parts that are neither clear nor concise.

The Consultation Draft details the preparation of a Camp Management Plan however, the statement, p1, that 'the policy will *strongly encourage* the local council land managers to prepare camp management plans for the site', allows for a Camp Management Plan to be discretionary.

For over two decades, and prior to the formation of the FFWG, actions were taken in Maclean with little or no planning, minimal documentation and scant regard to flying-fox behaviour and ecology. The very significant and negative repercussions of that approach are still in evidence today.

Recommendation: The preparation of a camp management plan should be deemed compulsory, and formally developed, before any action is taken, at any level.

2. The Policy presents a hierarchy of actions for incorporation into a management plan, but fails to define responsibility.

Creation of buffer zones can involve quite extensive clearing depending on the size and location of the FF colony, and incremental buffer zones over the five year life of a management plan may have an effect exceeding a Level 1 or Level 2 action.

- a) It is unclear in the draft policy whether the creation, and maintenance, of the buffer zones, and the monitoring of their effect, is the responsibility of the land owner or a relevant government agency
- b) To prevent extensive buffer zones having a negative impact on the flying-foxes, offset areas should be included in a camp management plan. Flying-fox ecology and behaviour should form the basis for the type and location of the offset area.

Vegetation management is a significant portion of both Level 1 and Level 2 actions in the draft policy. Vegetation management also forms part of the Maclean Strategy and has been complex due to the camp covering multiple land tenure.

It has been our experience that the requirement for vegetation management has not been matched with the responsibility for such action by some land owners, and has resulted in delays in implementation.

In addition, in Maclean some land owners have acted outside the Strategy.

Poor vegetation management presents a risk of unregulated clearing, impacts on animal welfare and provides for unplanned consequences.

Recommendation: That the Policy a) defines and regulates how, and by whom all land clearing and offsets are managed within a camp management plan and b) confirms that actions outside a management plan are not supported.

3. The draft policy is not clear on the extent to which a camp management plan will be put into effect.

The option of disturbance or dispersal as a level 3 action 'is an action that aims to intentionally move entire camps from one location to another'.

The policy does not recognise that the new location may itself be problematic, nor does the policy state whether the original camp management plan will be applicable to the new location.

Prior to the formation of the FFWG, a dispersal was carried out from the area in and around the school in Maclean, and subsequent to that 2 new satellite camps formed in the nearby towns of Iluka and Yamba. These sites comprised a different group of landholders not involved in the decision to disperse, but were affected by the results.

After a period of time, flying-foxes also returned to Maclean but to a different site closer to the residential area of Maclean. Being residential, this site has different issues such as interruption to sleeping patterns, which were not an issue at the original site at the school.

The draft policy recognises dispersal can have uncertain outcomes - but does not offer a solution for managing them.

Recommendation: That the draft policy carefully considers the possible results of the recommended actions, and what plan/s will address those results.

4. The draft policy recognises the three different species of flying-foxes but does not appear to recognise that one species [Little-red flying-fox] has markedly different behaviour and ecology from the other two species.

The policy also does not appear to recognise that ephemeral camps are different from maternity camps.

In Maclean, the presence, or absence, of particular species has led to conflicting claims regarding the earlier management of the camp, and erroneous claims regarding the success of previous management strategies.

In the Clarence area, the predominant flying-fox species is the Grey-headed flying-fox, which has 'vulnerable' status both state wide and nationally. As Grey-headed flying-foxes move across NSW, they require a network of camps, which have a history of use, and need to be maintained approximately every 50 km.

Some camps [such as the one in Maclean] are maternity camps vital to the existence of the species.

Recommendation1: That the policy recognises the clear distinction between species, and the importance of the different camps they occupy.

Recommendation 2: A strategy is included for the oversight of the state-wide effect of the policy, supported by a framework of conservation indicators as set out in the National Draft Recovery Plan for Grey-headed Flying-foxes.

5. As the policy will cover the range of 3 species of flying-fox throughout NSW, and the proposed permit/licensing time frame is to be in place for at least a 5 year period, it is important that clear and concise documentation be made, and that documentation should be collated and regularly monitored through a centralised process.

If not monitored over a 5 year period the total effect of the proposed actions could have significant negative impact with the worst case scenario being widespread disruption to flying-fox feeding and maternity habitat and commensurate loss of future offspring.

It should be noted the National Flying-fox Monitoring Program cited in the draft policy does not record nor collate the extent and frequency of vegetation modification across the state.

A comprehensive state-wide record should allow for the evaluation of this policy and also inform the decisions of a state-wide policy of the future.

Recommendation: The establishment of a public register which contains copies of all local Camp Management Plans produced, and which includes the amount of vegetation lost by Level 1 and 2 activities; offsets established; a record of camps disturbed and the sites of newly established camps within a 50km radius. The register should be readily available and user-friendly for the community.

Thank you for the opportunity to comment on the draft policy.

Yours sincerely,

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