



05/09/2014

Good afternoon,

This submission to the biodiversity legislation review addresses the following point.

## Theme 5: Wildlife management

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*Is the current framework for wildlife licensing, offences and defences, including those applying to threatened species, easily understood? Is the current licensing system too complex? How can it be improved and simplified to focus on conservation outcomes?*

I submit our comments on behalf of the Native Animal Rescue Group (NSW) Inc. a wildlife rescue and rehabilitation volunteer charity operating in and around the wildlife rich area surrounding Braidwood.

To understand our situation, it is important to note our area has a small human population but has abundant wildlife and is intersected by the killing ground called the Kings Highway. This is a notoriously dangerous road because of its actual nature, as well as the fact that huge numbers of wildlife get killed on it on a daily basis (and too many people for that matter). Our membership numbers are quite small but the number of native animals coming into our care is large and so any restriction to memberships makes our volunteer work even harder.

This is the case with the current licencing arrangements through the licencing section of NPWS. In fact this is restrictive trade practice at its worst. Unlike ANY other community based volunteer activity (such as Rural Fire Service brigades for instance) volunteers are restricted in their choice of wildlife care groups. They are only allowed to operate under the group where they live. The only exceptions to this are in a handful of cases where there is an

MOU between two neighbouring groups but this only works if the neighbouring group is cooperative. NARG has one MOU in place with Wildcare Queanbeyan Inc. and it seems to operate satisfactorily but two of our other neighbouring groups- WIRES Southern Tablelands (which seems to have no authority so has to work through its head office) and Wildlife Rescue South Coast (WRSC). Both refuse to engage even in a conversation about this let alone work in a cooperative manner. Because of our small population base, NARG can only exist and operate effectively with the support of authorised carers who live out of area and if they are in an area other than NARG or Wildcare they are not allowed to operate under our licence. This is not the case in Sydney for instance where any carer can choose between WIRES or Sydney Wildlife which seem to exist over the top of each other. Across the whole state WIRES seems to lay claim to vast tracts of land which they then are unable or unwilling to actually service. I believe there are exceptions right across the state, so it is not exactly fair. The area to the South of NARG area which we and LAOKO actually service is supposedly a part of WRSC territory and they have no one at all in that whole area and it is we who do all the wildlife work in that area. At the very least, LAOKO and NARG's zones of operations should be extended to include the area of Krawarree, Snowball, Jinden and the road to Numeralla through the Badja NP. Those two groups would then have adjoining areas and could then get an MOU sanctioned by licencing who refused to allow us to have one up until now.

So the boundaries are both unfair and somewhat illogical- a carer can only join one group as an authorised carer, but large areas are not being effectively covered by groups like WIRES and WRSC because they claim the area as theirs but then don't do anything there. The MOUs aren't working because some groups refuse to engage in the process.

Related to these notions of course is that some boundaries are far too large and the organisations can't look after them. (for instance WRSC stretches from Wollongong to the Victorian boarder) no wildlife care group can be expected to administer such a large area. At least some of these areas should be offered to groups that have connecting boundaries and the group should be split into more workable sizes and a new licences be issued.

As with any volunteer organisation with passionate members, wildlife groups have often seen a lot of infighting within and between the membership. This infighting This can be alleviated almost immediately if rehabbers are given the choice of joining nearby groups. NARG has established sound processes of supervision for its outlying carers who a licenced under NARG but who live in the Wildcare area) We have a number of other members who wish to be licenced and supervised by NARG but are not allowed because their local group has this 'dog in a manger' attitude and will not sign an MOU I assume because they don't want members of other groups living in their area. Just this one change alone would immediately stop a lot of ill feeling and infighting and complaints to NPWS. Most importantly, if groups had to "compete" a little to gather and hold their membership they might just have to lift their game somewhat and develop better attitudes towards members. To put it bluntly it would make groups lift their game as they would be competing for Rehabbers.

Caring members are becoming harder to find due to the large amounts of time it takes up, the hard work and high expense of being a wildlife carer. NPSW regional offices sometimes and in some places give modest yearly grants to some groups but sadly some groups do not receive any money. This is somewhat inequitable. Any group doing a fair share of the wildlife rehabilitation needed across the state should be supported specifically and financially by NPWS. This could occur at licencing time for instance when a group's yearly

grant is issued after they have supplied their annual data information by the due date as a small thank you and to recognise all the work wildlife carer groups do.

The work done by volunteers really does save the government vast sums of money (many Millions a year would be a modest estimate). The actual amounts of these grants should be the same amount to each group regardless of size and membership numbers but is perhaps best based on the amount of work done by the groups as can be seen in their annual returns- number of rescues undertaken, animals in care, kilometres travelled etc- a formula could be negotiated based around the amount of work compared to the size of the membership for instance. Just because a group has less members does not indicate that the group is not working hard. In fact, I suspect the reverse is more likely true. Large amounts of volunteer time is spent on fundraising activities. It is the major hurdle to most groups as it puts a very real burden on the members.

NARG believes that licences should still be available to groups of carers but with less restrictive policies of membership and areas. We are firmly committed to the principle that licences be available, like in Victoria, to individual “shelters” as they are called there or indeed available to individual who can provide evidence they can do what is needed. We also call on the Department to allow well established species- specific groups to be granted rehabilitation licences. The most needed of these would probably be koalas, wombats, reptiles and raptors. Some of these species already have very well established “interest groups” whereas others, like raptors would need time to have the groups for and set up their support networks. NARG firmly believes there is an urgent need to have a rehabilitation licence for wombats in particular probably through the Wombat Protection Society. The precedence is already in place with the Seabird rescue group which seems to be allowed to work in any coastal groups area and the North Coast Koala specialist group similarly.

NARG has an ongoing concern with how easy it is to get a licence to kill native wildlife compared to how hard it is to get a licence to care for them. This really does need to be addressed. At best, some NPWS staff do monitor the killing permits quite closely but others quite obviously do not. Sadly, however, this only addresses the honest members of the public. This group has a huge concern with the amount of illegal killing of wildlife right across NSW but in particular in our area of operation. There is a very real sense of being at the “frontier” in this aspect of our volunteering. We are subject to regular abuse from others as a result of our caring for wildlife. We have a good working relationship with the local police but there are only a couple of them. We believe fines and other “means of persuasion” need to be very greatly increased to try to enhance the power of the law and indeed the rule of law regarding protected species.

Thanks for the opportunity to make a submission. NARG would be pleased to contribute to the development of an improved system to focus on the twin goals of rational and caring conservation as well as the welfare needs of specific individual animals through direct contact or through any brokered situation where our expertise and knowledge can be of benefit.

Wishing you well and hope you are able to come up with a better, more effective system of licencing and legislation to improve the outcomes for our native species and indeed, the people who care for them.

Bill Waterhouse

President

Native Animal Rescue Group.



24/7 hotline



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