

Submission to the Biodiversity Legislation Review

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Please do not publish contact details.

Dear Sirs/Madam,

I would like to make some comments to the review panel on some of their Statements of Interest. I would also like to comment on changes I would suggest need to be made, particularly on gaps and inadequacies in the current framework, and the ways that the legislation works in practice.

I am an advocate on behalf of our native wildlife.

I am currently a Director on the Board of "The Wombat Foundation". The Wombat Foundation provides financial support in the quest to save a critically endangered species, once but no longer extant in NSW: *Lasiornis krefftii*, the Yaminon or Northern Hairy-nosed Wombat.

I am also a representative on the NSW Wildlife Council, the peak body for wildlife rescue and rehabilitation groups. I have been working hands-on with wildlife as a licensed wildlife rescuer and carer for 18 years.

I am the owner of 530 acres of land in South East NSW. I am a Conservation Partner with OEH. I am a part owner of property backing onto the proposed stabling facility of the SE Light Rail at Randwick Racecourse.

Theme 1: Objects and principles for biodiversity conservation.

Statement of interest 1.

Should there be an aspirational goal for biodiversity conservation?

1.

There should be no compromise in identifying "best practice". It doesn't matter what the context is, or the resources currently available.

In studying Australian wildlife, policy makers and scientists need to remember what it is that they are trying to achieve: the revival (not merely survival) at a sustainable level of Australia's complete biodiverse web of life.

These aspirations should be independent of politics. They are important to the people of today and tomorrow. They are important for intergenerational equity.

There should be no race to the bottom in environmental standards.

All this does is give governments an excuse to cut funding.

Saving a species is not necessarily costly. It is often the scientific research that goes on around saving a species that is costly. That is not to say that we should not be doing the scientific research.

Example:

Saving a critically endangered species.

It does not necessarily cost huge amounts of resources to save a species.

If a threatened species can be protected from human interference and from other calamitous interactions, to a large extent it will look after itself. The Queensland Government, with help from private partnerships, has already proved that security of land tenure and security from outside interference can make a huge difference to a critically threatened species. In the 1980s, numbers of the critically endangered Northern Hairy-nosed (NHN) wombat had dropped to between 20 and 30 animals. The NHN Wombat is still one of the most endangered mammals in the world. However, at the last census in 2013, the numbers had increased to between 170-200 individuals.

This increase in numbers has taken time but very, very little money. The area of habitat where they still reside has been set aside as a Scientific National Park with no public access. Parts of the National Park have been fenced by conservation volunteers and the wombats left to get on with breeding. There has been limited human interference (only by volunteer caretakers observing for threats, and by scientists to learn more about the species). There has been no human interference designed to increase wombat numbers apart from grass-cutting, fencing.

They are now at numbers where translocation to new sites is possible, to lower the risk from fire and flood. It is also possible that in the future, the numbers will be high enough to allow some minimal public interaction. Hopefully, the numbers will climb sufficiently that they are no longer endangered, and it would be really wonderful if at some point in the future, they could be reintroduced to NSW (where they are listed as extinct), under the Save Our Species Program.

This method is probably already being utilized for a number of NSW threatened species, particularly in conjunction with Conservation Partners.

2.

As we all realize, part of the problem under the current legislation is that there is in practice, a conflict between critical habitat preservation and human development. There is a constant balancing act at all levels of government that makes for great complexity and red tape. This constant conflict needs to be resolved, so that legislation and compliance can become far less complex.

There is no point in having this review and developing any new legislation or policies, if the basic parameters (things that should be called certainties or absolutes) that underpin assumptions are constantly changing.

Planning laws must be locked into place that provide absolute certainty as to where future human development will and will not be allowed: Development in certain areas, minimal development in others, none in others. I know forward planning has started to occur in NSW, but it needs to be on a much smaller scale than it has been previously, agreed on a bipartisan basis, and agreement put in place that will be binding on future governments, regardless of what future mining, residential or other schemes are suggested for jobs, income or any other “dangling carrots” that are held out to government as alternative uses for the areas designated as free of, or minimal, human development. The mapping needs to be performed at an ecological community level that protects critical habitat. Now we have GPS, there is no

technical reason why this could not be done, and I'm sure much has already been mapped.

Once this process of determining critical and endangered habitat has been performed and zoning to a micro level has occurred, development can go ahead without constant resort to Environmental Impact plans and reports.

This certainty would be good for all in the community.

It would considerably cut down on compliance costs of time and money for development in the long term. Residential and agricultural planning could take place without much of the red tape that currently exists and it would take much pressure off already over stretched wildlife groups who constantly have to fight to retain habitat.

I know the government has recently done some similar assessment along geological lines, so planning at this micro level should not be too difficult to achieve.

Once guaranteed planning spaces have been put in place, future habitat can and should be designed and planted in appropriate spaces to support threatened and other species under a long-term plan. This would be a good area for co-operation between Government/non-government partners.

Any council that then allows development (particularly residential) anywhere near critical habitat should be financially penalized, and that money spent on building future critical habitat capacity.

A great example of this is Maclean High School. Let us hope this never happens again. The school was built beside remnant rain forest. It wasn't a problem then, because they could just shoot the Flying Foxes.

Micro level planning goes against the whole concept of a wild Australia, but unless something like this happens, we will lose Wild Australia completely. This likelihood has already been demonstrated by the numbers of extinctions already on this continent since white settlement.

In the next forty years we are meant to have a population increase in Australia to approximately 42,000,000, almost double what we have today. As much as half of this increase could be in NSW. If NSW is to deal with this in a sustainable way, we will have to streamline the processes, take away the conflict and the red tape, and put a great deal of thought and effort into how we retain our wonderful environmental uniqueness, while integrating all these people.

Australia will look nowhere the same, and not be the same place. It will be more like Europe or America, with people located in many more places across the country. We have to have a basis for planning residential and industrial development, and infrastructure such as roads, airports and schools. If we don't have a very detailed plan for this, hence knowing "up-front" where we are not going to allow human development, we will lose our wildlife. Our wildlife is one of the things that makes Australia different from the rest of the world. It is what a lot of tourists come here to see.

My recommendation is that the aspiration should be the revival at a sustainable level of Australia's complete biodiverse web of life, in a manner that provides underlying certainty of land tenure.

3. To what extent are the current objects being met?

Threatened Species Conservation Act 1995

The Grey Headed Flying Fox (GHFF), which is one of the most problematic threatened species in NSW with its interaction with humans, lives basically within 200 kilometres of the coast. This is where the greatest pressure on development is located, but a 200 kilometre corridor right down the Eastern Coast of NSW, is a huge area of land. Some sizeable part of that huge area must be able to be designated as sacrosanct critical habitat for this necessary species.

In 2011, approval was given for the 22,000 strong Grey Headed Flying Fox colony to be dispersed from the Sydney Botanic Gardens, with the Minister for the Environment stating that there were alternative bat colonies at Parramatta, Kuringai and Cabramatta that the Flying Foxes could utilise.

<http://www.smh.com.au/environment/animals/huge-sydney-bat-colony-to-be-evicted-20110217-1axtm.html>

No monitoring was undertaken to see to where the Flying Foxes had dispersed.

Yesterday, however, it was announced by the State Government that Parramatta is to have 6,000 new homes. These are to be built right beside the Parramatta Flying Fox Colony.

<http://smh.domain.com.au/real-estate-news/6000-new-homes-planned-for-sydneys-west-20140828-109i27.html>

Where will the Flying Foxes be safe?

This is a species necessary to humans, but they are being abused by massive and widespread habitat destruction; (both roosting and foraging) as well as by climate change induced heat events. Any species hit on two fronts at once needs very little to tip it over the edge to extinction.

The treatment of the GHFF in Sydney is a classic example of “time inconsistency” in government policy. It would not have happened with the sort of planning recommended in the earlier part of this submission.

d) eliminate or manage certain processes that threaten the survival or evolutionary development of threatened species, populations and ecological communities.

Example

Widespread Habitat destruction

Substantial tracts of important winter flowering species, particularly *Melaleuca quinquenervia* and *E. robusta* have been zoned for urban and rural residential

development. Approximately 40% of the extant *M. quinquenervia* and 36% of the *E. robusta* within the City of Coffs Harbour, New South Wales are on land targeted for development by 2010 (Coffs Harbour City Council 1996). Seventy percent of the *M. quinquenervia* swamps between Noosa Heads and Tweed Heads have been lost to urban development (Hall unpublished).

<http://www.environment.gov.au/node/14622>

The S E Light Rail Project in Sydney will cut down 800 forage trees for GHFF.

NSW Councils and private landholders should be constantly encouraged to build foraging habitat capacity by planting strategically located copses of trees (particularly winter flowering trees) that provide food resources for all arboreal species such as Yellow Bellied gliders, Greater Gliders, Squirrel Gliders, Koalas and Flying Foxes.

Interim measures, until planning laws provide certainty of habitat tenure, should include current GHFF roosting areas being added to the NSW Critical Habitat Register.

However, here is a problem with the *Threatened Species Conservation Act 1995*

Grey-Headed Flying Fox

This species is listed as “vulnerable”. Both Roosting areas, and foraging areas are critical habitat for its survival.

S. 37(1) of the New South Wales Threatened Species Conservation Act 1995 states that ‘The whole or any part or parts of the area or areas of land comprising the habitat of an endangered species, population or ecological community or critically endangered species or ecological community that is critical to the survival of the species, population or ecological community is eligible to be declared under this Part to be the critical habitat of the species, population or ecological community.’

(Taken from Department of Environment, Climate Change and Water NSW. 2009. Draft National Recovery Plan for the Grey-headed Flying-fox *Pteropus poliocephalus*. Prepared by Dr Peggy Eby. Department of Environment, Climate Change and Water NSW, Sydney.)

That is, in New South Wales critical habitat cannot be declared for a species listed as “vulnerable” under the *Threatened Species Conservation Act 1995*.

Sydney has several permanent populations of Grey-Headed Flying Foxes. The Light Rail Project in the Eastern Suburbs of Sydney is just about to cut down 800 trees, most of which provide foraging habitat for Grey-headed Flying Foxes. This will put even greater pressure on other foraging areas. In the Light Rail EIS, none of the heritage listed massive old fig trees on the site for the Light Rail Stabling Yard have been listed, apart from one at one end of the site that is to be saved. All these trees will be cut down as part of the 800. This is of pertinence to Objective E below.

<http://www.sydneylightrail.transport.nsw.gov.au/information/resources?type=C>
[SELR-Environmental-Impact-Statement](#)

In conclusion, none of the objectives from Theme 1, Objects and Principles for Biodiversity Conservation, Appendix 2, Objectives A – E under the Threatened Species Conservation Act 1995 have been entirely successful. I cannot comment on F.

Native Vegetation Act 2003

The objectives stated under this act are not comprehensive. There is a major missing component to acknowledge the destruction done to native vegetation by feral grazers and browsers.

Arguably, the management of feral grazers and browsers could be assumed under the general objective A:

a) provide for, encourage and promote the management of native vegetation on a regional basis in the social, economic and environmental interests of the state.

But the destruction caused by feral animals is such a significant issue, that it needs addressing in a significant manner.

Please see my notes on feral animals below under Theme 5 – Wildlife Management.

1(b) Have the threats to biodiversity posed by (b) feral animals and weeds, been effectively managed?

National Parks and Wildlife Act 1974

NPWS is meeting these objectives as they stand, but there are major gaps in the objectives.

Please see my notes below under Theme 5.

Monitoring and enforcement

Monitoring and Evaluation

Theme 2: Conservation action

Statement of Interest 2

Are there elements of the current system for private land conservation that raise impediments (for example, the binding nature of agreements and potential loss of production) for individuals who want to manage their land for conservation? If so, what are they? What incentives might be effective, efficient and equitable in promoting biodiversity conservation on private land?

I am a conservation partner with OEH having put “wildlife refuge” status on two parcels of land that I have owned. One was recently sold and I have noticed the “wildlife refuge” sign has come down from the gate. As a wildlife carer, I have released a number of rehabilitated native animals on that land and it distresses me that the wildlife refuge title is not more secure. I would

like to suggest that there are two options for “wildlife refuge”. 1) non-binding for a new owner, or 2) can be made binding before sale. The seller then has the option of taking the risk of higher or lower value of the land as perceived by the ecological sensitivities of the new buyer.

Our other parcel of land currently also has only wildlife refuge status because the covenant option which could bind the land for conservation purposes is too restrictive. It pertains to landscape on a much grander scale. We have not yet built our house there, and once we have built, I will be releasing native animals back into the wild. I need the flexibility to decide when and where to place new release enclosures. Often it is necessary to build release enclosures in different areas, and at different times. It is impossible to see into the future and decide where I may wish to have these enclosures because the landscape is constantly changing, as are the types of animals I get into care. Under the current covenant rules, I have to decide now, where I will place paths through the bush, where I will place all the enclosures I may ever need out into the future. This is totally unrealistic for someone inhabiting the land and utilizing it as I do, and as others in the next hundred years and on may do.

However, at some stage in the future, I would like to be able to ensure the safety of the native animals that exist on all these 530 acres by a binding covenant on the land. There needs to be a middle way whereby the landholder can negotiate with NPWS to come up with a covenant that is more flexible, even if it is simply option 2 as described above where the land is bound as wildlife refuge, no matter the owner.

Theme 4: Conservation in development approval processes

Statement of Interest 4 & 7

4. Does the regulatory system adequately protect listed threatened species, populations and ecological communities? Is there utility in specifically protecting these entities through the regulatory system?

The government must maintain its role as guardians of the environment and its flora and fauna. The regulatory system is currently inadequate and if it stays, needs tightening. If the current regulatory system did adequately protect listed threatened species, there would be no culling or dispersal of Grey Headed Flying Foxes. Nor would local councils be able to pass approval of development near critical habitat. However, if the regulatory system did not protect them, they would be even more vulnerable than they are now. Given what has emerged in further evidence put to the recent ICAC Inquiry, I cannot see self-regulation by developers working.

The better alternative is habitat planning at a micro level, as recommended above in respect of Theme 1.

If the work has already been done by small scale zoning to habitat level, the regulations affecting development may not be needed. A decision would have already been made about whether development could go ahead on the land without the need for further ecological assessment.

7. Some impacts cannot be offset. What are they? Are these appropriately addressed in approval systems? What is the relevance of social and economic benefits of projects in considering these impacts?

There should be no off-sets applicable to critical habitat. The notion is nonsensical.

Theme 5: Wildlife management

Statement of Interest 1.

Have the threats to biodiversity posed by: (a) people taking animals and plants from the wild, (b) feral animals and weeds, and (c) illegally imported species, been effectively managed?

I wish to address (b) Feral Animals

1. Effect on vegetation.

There is a serious and increasing problem with feral herbivores, particularly browsers: Goats, pigs, rabbits, horses and to a lesser extent hares, donkeys, camels and deer.

In western NSW, between Cobar and Broken Hill, the goat problem is completely out of control. A blind eye has been turned this way, because farmers derive income from 'self-trapping' goats. What kind of implications does this have for animal welfare outcomes, and for our native vegetation? Goats eat everything. Goats have been unanimously blamed for the destruction of all the forests of the Mediterranean Basin.

<http://www.fao.org/docrep/50630e/50630e06.htm>

We are seeing the same thing happen in western NSW.

It is becoming so bad, that drivers on the highway might encounter as many as 100 goats on the road.

Until recently, we were very lucky on our property, with very little feral problem apart from rabbits and foxes. Recently however, one of our neighbours "lost" 17 pigs into our critically endangered box-gum grassy woodland. Since then, we have had a massive issue with the pigs digging over the endangered native temperate grassland areas to dig up remnant Murnong. We can do virtually nothing about this environmental destruction.

In the last 10 to 15 years or so, there has been an increase in wombat and kangaroo numbers. This has coincided almost exactly with the massive decline in rabbit numbers caused by the release of the Calicivirus. Rabbits have been kept under control with Myxamatox and Calicivirus, but the effectiveness of both is waning and there are no resources being put into developing a new method of control to take over when the above two no longer work. It is obvious in the bush that rabbits are already making a resurgence from the Calicivirus.

2. Effect on Native Wildlife

Apart from competing for food, feral animals such as cats and foxes carry serious diseases that they transmit to our native animals. Diseases such as toxoplasmosis and mange are very serious threats for all three wombat species, including the Southern Hairy-nosed Wombat (*Lasiorchinus latifrons*) which is endangered in NSW, and the Northern Hairy-nosed Wombat (*Lasiorchinus krefftii*) which is considered extinct in NSW. These diseases affect other native species as well.

Our landscape is so fragile, and these animals so destructive. Account must be taken of their impact in planning with integrated feral animal control measures. This is not a problem that “cannot be contained”. It needs willpower and resources and concurrent co-operative action.

Statement of Interest 2

Has the NPW Act and the supporting policy framework led to a positive change in the welfare of native animals (captive or free living)? What role if any should the government have in ensuring the welfare of individual native animals, particularly where there are stand alone welfare laws such as the Prevention of Cruelty to Animals Act 1979?

It is most important that the State be the guardians of both free-living and confined native animals.

The legislation in this area needs a complete overhaul.

At the current time, virtually no cases pertaining to the welfare of native animals are taken to court because:

1. The Prevention of Cruelty to Animals Act is not rigorous enough.
2. RSPCA is mainly interested in companion animals, and does not have the resources to spread itself further.
3. The NSW Animal Welfare League is interested but doesn't have the resources.
4. NPWS does not have the resources.
5. The Environmental Defenders Office is no longer financed by government and can now take a much more limited load.
6. There are not enough parties with appropriate standing in the courts.
7. Costs may be awarded against the RSPCA, AWL or NPWS if they don't win the case, providing a sufficient deterrence against undertaking prosecutions.
8. Police aren't interested or too hamstrung by ineffective legislation to do anything.
9. There is no wildlife monitoring or enforcement by any NPWS body.
10. Although Firearms and Hunting legislation is not in the review, it has significant impacts on ability to prosecute.

A Major gap.

Monitoring and Enforcement

NPWS needs a well-resourced, dedicated enforcement team.

This would be number 1 on the wish list for any wildlife worker in NSW. The implications of this gap are with us 24 hours a day/7 days a week.

NPWS needs to have a dedicated enforcement team that can work out of hours and has, at the very least, secondment of an inspector from a body that holds animal welfare standing in the courts, (such as NSW Animal Welfare League, or the RSPCA), and the police. (I do not know if NPWS rangers have standing in the court in their own right). A good outcome would be sufficient resources to give NPWS enforcement teeth. Another possibility is a dedicated Police Wildlife Unit, like they have in the UK, where every county has a Police Wildlife Unit and there is a National one as well. Currently in NSW, there is no monitoring and enforcement of compliance for anybody. None for farmers utilizing tags, or of commercial kangaroo shooters. There is no monitoring of compliance with the National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes. There is no team that works out of hours to control illegal shooting on private property or in National Parks.

There is no-one checking up on shooters of Bows and Arrows who are a particular nuisance for wildlife groups, often leaving animals mobile with arrows shot through them.

Even if there was random checking it would make a big difference. We have anecdotal evidence that farmers apply for 50 tags and then shoot as many as they like. From personal observation, both wombats and wallabies are sometimes shot as well as kangaroos. Wallabies, Wallaroos and Wombats do not receive tags in our area unless in very specialized circumstances. This was not one of those.

Implications for Wildlife Workers:

Less animals coming into care. Less counseling of distressed members of the public.

Ability to report instances of illegal activity being reported to us by members of the public.

Constant instances of monitoring by volunteer rescuers, volunteer licensed darters and/or volunteer shooters with wildlife euthanasia status (often for days at a time), to try to track down and follow still-mobile animals with arrows through them.

Psychic relief from knowing that sometimes perpetrators of inhumane acts are brought to justice.

Implications for Rural Residents:

I have experienced illegal shooting on my property in the SE of NSW, and I constantly hear anecdotal evidence of illegal shooting on private property (not by the owners, but by unknown shooters). I also often hear about illegal shooting in the National Parks.

On one Sunday afternoon, I had two lots of illegal shooters on my property at the same time and unknown to one another. I confronted one lot, but couldn't catch the other. Fortunately, I had three human males with me that day.

On another occasion I was home on my own and woken in the early hours of the morning by shooters on my property.

Anecdotally I hear that wallabies get shot and taken out of Deua NP most week-ends.

Locals complain all the time of their gates being cut, or if the hunters can't get through the gates, the property fences are just cut and left down, which when a farmer has stock, is much worse.

I ask why don't people call the police, and always I hear that the property owners were either too scared, or that the police take no interest.

I've heard anecdotal evidence from local property owners, of them walking on their own property and suddenly being confronted by hunters emerging out of the bush in combat fatigues carrying bows and arrows.

It is way too difficult with the legislation as it is at present, for anyone to try to get a conviction for illegal hunting of native animals. Even the trespassing laws are ineffective. It actually must be very dispiriting for the rural police and for NPWS staff. It is no wonder they take no interest.

I would ask the panel to talk to NPWS about their ability to take perpetrators to court, and how many have been taken to court in the last 10 years. How many of those have been convicted, and what were the sentences of those convicted? What are the legislative or judicial problems with securing a conviction?

There would be plenty of people in the rural areas who would call in illegal shooting if they knew who to call, and that their calling would do any good.

Statement of Interest 4.

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

I can only comment on two licences.

1) Group and Individual licensing for "Wildlife Rescue, Rehabilitation and Release". At the current time, this licensing needs to be more flexible, Perhaps to permit the licencing of two groups in the same region, or some further groups which are species specific. It would be useful for there to be flexibility for carers in their choice of group.

This is because of inter and intra group politics within wildlife groups which is a constant problem. The only way this will be resolved is by the development of a set of training standards, so a carer can be assessed as competent and have their competency recognized by all groups in NSW. This is in the pipeline, but will take time. At present, a carer has to undergo serious training before being allowed to rescue or care for native animals. However it is group-specific training, and while the training will be similar across all the groups, it has not been formalized, so moving from one regional group to another can be difficult.

I am not sure whether these licences should focus on conservation outcomes, or whether they should focus on animal welfare. However, there is no doubt that methods of care learnt on native animal species can have important consequences for the care of a threatened species on the rare occasions that they come into care.

2) Licences to cull.

Culling should be an absolute last resort

There are so many simple solutions to problems caused by humans living with wildlife. Licenses to shoot should be a last resort after a resident has “proved” that they have exhausted all other avenues. (Similar to the objectives of Off-sets, which are there as a last resort)

Example – One of the few reasons for giving out tags to kill wombats is where they are seen as a threat to livelihood, such as on a horse stud, where the animals may put their foot down a burrow and break a leg. This is easily remedied by two pallets leant together over a wombat burrow. The horses easily avoid the visible pallet obstacle in the paddock and the wombat has free egress to come and go.

Many people, including many farmers, do not understand that kangaroos do not compete with sheep except in times of drought. The sheep’s preference for food is 1) forbs, 2) legumes, 3) grass. This is the order they will eat in a paddock. The preference for kangaroos is 1) grass. Therefore they only compete when times are tough.

Statement of Interest 5.

Is there currently appropriate regulation for the sustainable use and trade of wildlife?

I do not know if the current regulations are appropriate or not. This is because there is a lack of evaluation in the system.

There is a voluntary code in the commercial kangaroo industry called “The National Code of Practice for the Humane Shooting of Kangaroos and Wallabies for Commercial Purposes”. Whenever questions are raised about the industry, the existence of this code is trotted out by government and the public service. However, this code is entirely voluntary, and there is **no monitoring and no enforcement**.

I know that outside the industry, the perception is that the licensing authority at Dubbo and the NSW Kangaroo Management Advisory Panel have been captured by a “boys club”. This is, of course, speculation, but it is the outside perception.

I will direct your attention to a current piece in the Western Advocate.

<http://www.westernadvocate.com.au/story/2525983/new-roo-cull-row/?cs=115>

I certainly object to the degrading ways the commercial industry finds to use animal parts, such as kangaroo scrotum purses, kangaroo paw back scratchers, and kangaroo heads on trophy boards, which are available at any tourist shop on Circular Quay.

I would like to suggest that these souvenirs have to be labeled to the effect that they do NOT come from farmed kangaroos but from wild shot kangaroos. On enquiring at one shop on Circular Quay, about a particularly objectionable piece, I was told by the proprietor that the kangaroo head on a trophy board was from a farmed animal. As there are no farmed kangaroos in Australia, and as The National Code of Practice for the Humane Shooting of Kangaroos

and Wallabies for Commercial Purposes states that animals have to be killed with a head shot, and this one obviously wasn't, I would suggest that the voluntary code does not always work.

I see no benefit, and can only see difficult animal welfare implications from allowing a further relaxation in the rules preventing the keeping of native animals as pets.

Monitoring and Evaluation

Statement of Interest 3 from Theme 3

I would like to answer this statement of interest in relation to Theme 5 rather than Theme 3.

How should the effectiveness of strategic planning approaches be monitored and evaluated?

I would suggest that NPWS be required to maintain better records keeping.

Suggestions:

1. Monitoring of the annual reduction or increase in applications for "culling tags" for various species, e.g Flying Foxes, Kangaroos and Wombats.
2. No hiding behind the words "this information is not recorded" as in the extract from a letter received from NPWS below.
This is information that MUST be recorded.

The NPWS response to the questions asked in your email appears below in italics.

- The number of S121 applications received each year?

NPWS response: It varies year to year. For example in respect of kangaroos 357 licenses were issued in 2011. In 2012/13 financial year 170 licenses were issued.

- How many visits are made by NPWS staff to a property to verify an applicant's claims?

NPWS response: The number of such visits is not recorded.

- How many follow up visits are made by NPWS staff to a property to ensure compliance on completion of a cull?

NPWS response: The number of such visits is not recorded. NPWS also relies on formal returns and the kangaroo tag system.

- How many times has a S121 application been refused by NPWS staff?

NPWS response: NPWS does refuse applications from time to time, which for kangaroos is often based on proximity to other residents or lack of demonstrated impact on a land occupiers premises. Numbers of refusals are not recorded.

3. No changes to statistical methodology unless all existing statistics can be assimilated into the new method. Collection of statistics is a waste of time if methodology is changed. It means we are trying to compare apples and oranges.

Example

The Federal Department of Environment changed the statistical methodology on the gathering of information on the commercial kangaroo kills, so that it is impossible to assess the long-term trend in meeting quota targets over time.

I appreciate the opportunity to offer you my thoughts.

Naomi Henry