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?

The Wombat Protection Society of Australia in N.S.W., attempt to work within the confines of the geographic group licensing preferred by NPWS and as such recruits licensed members from other groups and provides them with support, education, facilities and information to better inform their practices. This however puts an extra burden on these members of having to belong to two organisations. This dual membership often creates a conflict of interest in these members when the goals of the two Societies come into conflict. We however, work in conjunction with those groups using our members to provide training and advice and as you would be aware, run major educational events like the National Wombat Conference to benefit those people.

We are concerned however that "all of species" groups lack the time and personnel to properly address adult wombat issues, particularly maintaining their health on private properties, managing and dealing with injuries to adult wombats and developing and maintaining appropriate rehabilitation and release facilities.

A large majority of our members have a specific interest and thereby expertise in wombats and do not wish to belong to groups that by necessity, require their members to be trained in general fauna rehabilitation. This is severely affecting the wellbeing of wombats in NSW. .NSW would benefit from a specialist group which from an influx of people interested in and capable of working with wombats alone and who would then then pass knowledge on to other groups, organisations and research bodies..

Our members are regularly confronted with the problem of being asked to give assistance by members of the public who are asking for help with sick or injured adult animals and are turned down by the local rescue group who do not have the training, expertise or equipment to assist or are unable to contact one of their members who does. Our members are unlicensed and therefore uninsured (however we have gained volunteers insurance via the Nature Conservation Councils group insurance as we were unable to join the NSW Wildlife Council as an unlicensed group).

The restriction on the Society's NSW activities produces a range of problems, including having to go outside the NSW Wildlife Council for volunteer insurance, not being able to allow our members who often have greater experience, better facilities and most certainly better access to professional advice and assistance specific to wombats to undertake work with wombats on their own in NSW. We have to match them with people licensed in a particular area which, while assisting increase the expertise of those local groups, often leads to doubling up of resources unnecessarily and often we have been contacted because the local group cannot manage the situation in any case and has not been able to supply personnel.

The Society's NSW members are more than willing to work in partnership with local groups and indeed, would want those local groups to continue to benefit from the greater expertise available to a species specific group as is the case with a number of other species in NSW so we feel a precedent exists.

Wombats have, by their nature and size, special needs, and are far more difficult animal to properly manage in the rehabilitation arena and deserve to be treated as such. In that sense they are similar to other highly specialised needs animals such as Koalas and sea mammals. Many of your local groups report to us that accessing veterinary care from vets who have no experience with wombats, often leads to inappropriate care and advice. Rarely are there members of "all of species groups" trained in issues affecting adult wombats, and a brief look at group training shows this to be self evident with the majority of the groups only having training on raising joeys, with scant information on developing health programs for or managing adult wombats. The Society does its best to follow through and assist in the education but were the Society able to operate under license in NSW, a more streamlined service would be available. We do not have this problem in Victoria where wombats in the majority of parishes aren't protected or in South Australia where different rules regarding wombats exist.

In States other than NSW including Tasmania, Victoria and South Australia we are able to directly advise and assist people who have wombats on private freeholds manage the health and welfare of their wombat populations and where care and rehabilitation is needed a network of groups, sanctuaries and members can be accessed.

One of the major problems for all the rehabilitation groups that you currently license is a lack of appropriate pre-release facilities and release sites. Once again, we have members willing to put in facilities and offer release sites but they do not want to be members of "all of species groups", many of whom have requirements that ongoing training in a range of species and activities be conditional on membership. As a result the wombat caring field is dramatically short of facilities and expertise and personnel in NSW. We believe that were we able to license species specific personnel we could dramatically increase the available volunteer pool, resolve the release site shortage, manage mange treatment programs on properties and provide a better service to the general public when they have problems with adult wombats on their properties.

In recent times we have had reported a number of incidents where other groups have delegated their responsibilities to check wombats, advise homeowners or rehabilitate wombats to people outside the system. We do not think this is an appropriate way of managing wombats and leads to incidents which are distressing and disturbing and force people to avoid the registered system as a result. We do not think this was an intentional outcome of the "all of species policy" but it is clearly a major problem at this time. It includes delegation to non licensed people to shoot wombats that have not been seen or assessed by licensed carers and delegation of inspection of properties or provision of advice to property owners concerning wombats back to the Society.

In addition, much of the work of our members is not recorded by NSW as we have no requirements or ability under the current system to refer our statistics to you. Given these statistics are used to update

wildlife atlas's and often are used by local councils to develop policies, once again, their lack of recognition impacts wombat populations negatively.

The mandate of the society is to assist existing groups develop their expertise and it would not be the intention of the society to take over where groups can clearly manage and have facilities and expertise in place, however there are many areas where local groups do not have the facilities, expertise or ability to provide support and training to those within their communities interested in and wanting to work with wombats

