

28 June, 2016

## Biodiversity Reforms – Have Your Say

### Online Submission

#### **BACKGROUND**

##### **New South Wales Wildlife Council**

<sup>1</sup>*The New South Wales Wildlife Council (NWC) is the peak representative body for licensed fauna rehabilitators. All licensed groups are offered membership of the NWC. Individual licence holders have one representative on the NWC.*

**Rehabilitation of injured, sick or orphaned native fauna** in NSW is provided by an active network of volunteer groups who rescue injured, sick or orphaned native fauna. These groups have an important role in:

- relieving the suffering of individual animals by providing appropriate medical treatment and care
- fostering an understanding of native animals and the natural environment within the wider community
- broadening the knowledge of wildlife biology and the threats facing particular species
- conserving wildlife populations by successfully returning healthy animals to their natural habitat.

<sup>2</sup>*Under the National Parks and Wildlife Act 1974, the Office of Environment and Heritage (OEH) licenses 28 groups, 27 Wildlife Information, Rescue and Education Service (WIRES) branches and 29 individuals to rehabilitate native animals. Some groups specialise in particular species such as koalas, flying-foxes or marine turtles, whereas others cover a wide range of species.*

NWC represent over 3000 volunteer wildlife rehabilitators through its network of 25 licensed groups or entities that rescue and rehabilitate protected fauna.

#### **SUBMISSION**

While recognising the importance of climate change and preservation and enhancement of wildlife habitat and the dangers presented to these by the Draft Bill's proposed risks-based approach, the New South Wales Wildlife Council is limiting its submission to matters directly affecting the licensing and operation of the wildlife rehabilitation sector in NSW.

<sup>1</sup> Rehabilitation of Protected Fauna Policy 2010 (Office of Environment & Heritage (OEH)

<sup>2</sup> [www.environment.nsw.gov.au](http://www.environment.nsw.gov.au)

In a letter to the Chair of the NSW Wildlife Council from Senior Manager Nature Conservation, NSW National Parks and Wildlife Service division of Office of Environment and Heritage it is stated

*"One of the purposes of the draft Bill is to replace the wildlife provisions currently contained in the National Parks and Wildlife Act 1974 (NPW Act) with a new, risk based framework for managing wildlife activities. Under this approach, it is anticipated that some low risk activities may be exempt from licences, codes of practice may be developed for medium risk activities, and high risk activities will continue to be licensed or prohibited. The draft Bill also proposes an accreditation system for fauna rehabilitation providers".*

The Draft Bill contains no legislative proposals that cover managing wildlife activities on which the Council can base its submission. Recommendation 29 states "facilitate effective local wildlife care through strategic partnerships with wildlife rehabilitation providers".

Until Government incorporates into the Draft Bill legislative proposals for the management of wildlife activities and development of any strategic partnerships it is the NWC's submission that the Draft Bill is defective and should not proceed in its current form.

#### **ACCREDITATION SYSTEM FOR FAUNA REHABILITATION PROVIDERS**

Before any accreditation system for volunteer wildlife rehabilitators is legislated, it is the NWC's view that the NSW Government must accept its obligation to provide licensed wildlife rehabilitation groups with the training and other resources required to make any such system equitable and workable. The licensed rehabilitation groups that authorise their volunteers for the rescue and rehabilitation of fauna need to provide their volunteer rehabilitators an equal opportunity to become compliant with the Code of Practice for Injured Sick and Orphaned Protected Fauna. In addition, resources need to be provided for compliance with the subsequent species Codes that have been developed by OEH in partnership with NWC and its constituent groups – Flying-foxes, Koalas, Wombats, Birds of Prey (in draft form) and those planned in the future.

The OEH Rehabilitation of Protected Fauna Policy (Rev. 2010) mandates (Clause 42) that a triennial assessment of fauna rehabilitation services will be undertaken by Regional Managers. This Policy has been in place since the original Policy was endorsed in October 2001 and it has taken almost 6 years from the current policy revision for a state-wide compliance audit of licensed rehabilitation groups to take place. No state-wide audit has ever taken place.

There is currently no evidence that groups do not meet Code Standards and it is the NWC's belief that is why the Office of Environment and Heritage is undertaking a sudden and short time frame Compliance Audit process of all licensed groups in NSW in the June to August 2016 period.

It is only when all licensed groups are able to afford their members the opportunity to be working off a common playing field that any thought should be given to development of an accreditation system – and is this an accreditation system for individual wildlife rehabilitators, or of wildlife rehabilitation groups, or a body that might be given licensing responsibility?

There are fears within the rehabilitation sector than any accreditation system could have negative impacts on what is currently an effective and robust system of volunteering by

skilled and dedicated volunteers for the benefit of injured, sick and orphaned protected fauna in NSW. An NWC Survey conducted among its member groups in 2008 identified a little-recognised value to the NSW Government of an over \$50 million annual input by the volunteer wildlife rehabilitation sector derived from, but not limited to, the value of:

- volunteer hours
- provision of 24 hour rescue telephone services
- provision of swift rescue
- provision of humane euthanasia of unreleasable or suffering fauna
- provision of training courses, mentoring, counselling, support and supervision
- provision of rehabilitation housing
- provision of personal protection equipment
- vaccinations (mandatory) for handling certain fauna species
- provision of veterinary services and medications
- provision of rehabilitation equipment to feed, house, medicate, temperature control, enhance fauna and prepare it for release
- provision of training resource materials, e.g. libraries, training manuals, Powerpoint presentations
- running costs of vehicles for rescues, deliveries, vet visits, training, meetings
- cost of telephone and internet services
- volunteer response to wildlife disasters
- compliance with Federal and State legislative requirements
- provisions of licences e.g. Animal Welfare category on Firearms Licences including tranquilizer devices
- provision of compliant wildlife rescue and rehabilitation data in common format
- community education in person and by print, electronic and social media

It is the Council's belief that an accreditation system could bring with it a cost to the individual rehabilitator that is unaffordable and below we quote from a representative of a northern NSW member group expressing concern at the accreditation proposal as it might relate to training:

"I have heard that the cost of doing these accredited courses (\$175 for introductory training) is reducing the number of people who can afford to be involved in wildlife care. We keep our costs to the minimum to enable people to participate as generally the people with the most time have the least amount of money. There were a number of people who attended our recent course that commented that paying \$175 was not affordable for them, especially couples".

If the NSW Government wishes to abrogate its responsibilities for rehabilitation of protected fauna it should devolve them to an appropriate body such as the NSW Wildlife Council with such legislative recognition and funding that enables the continuation of the vibrant and robust rehabilitation sector NSW enjoys today. It must engage closely with relevant stakeholders as it continues to develop this part of the new reform package.

#### NATIVE ANIMAL KEEPING LICENSING

Licensed wildlife rehabilitation groups are in many respects the "Native Animal Welfare League" and receive into rehabilitation care many different species of wildlife that well-meaning but untrained members of the public have attempted to foster or hand rear. On

many occasions much harm and suffering has been caused that there is no alternative but to euthanase these under or wrongly-nourished and compromised animals. In many cases the original encounter location is unknown, or these animals have been translocated and would compromise genetic integrity if they were to be rehabilitated and released. There is a great potential for spread of disease and competition for habitat with endemic fauna. All these factors will have a significant deleterious effect on wildlife populations and Biodiversity – things the Bill is supposed to protect and enhance.

Relaxing licensing provisions as they exist today in our view will lead to an increase in harm to and illegal sales of native fauna. As a result more animals will be subject to abuse, cruelty and neglect and will end up abandoned or surrendered to wildlife groups, veterinary clinics or RSPCA depots. Wildlife rehabilitators deal with many stressful and distressing situations with great fortitude, skill and determination. Unintentional harm caused to wildlife by ignorant but well-meaning members of the public can be one of the most distressing things faced by a rehabilitator.

## **CONCLUSION**

The wildlife rehabilitation sector in NSW has been operating in a licensed environment for the better part of three decades with little financial support from Government in relation to the value to Government of the sector.

The rehabilitation sector has provided an effective wildlife rescue, rehabilitation and release service operating in a totally volunteer framework.

Codes of Practice were developed successively over the past five years without Government providing the necessary resources to the sector to adequately train and equip the over 5000 volunteers that are active in wildlife rehabilitation at mostly their own cost.

**Until Government incorporates into the Draft Bill legislative proposals for the management of wildlife activities and development of any strategic partnerships it is the NWC's conclusion that the Draft Bill is defective and should not proceed in its current form.**

**Meredith Ryan**  
**Vice Chair and**  
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**For**  
**NSW Wildlife Council**