

Draft Tweed Flying-fox Camp Management Plan 2018  
 Submissions analysis  
 Exhibition period: 3 October – 14 November 2017

Sub #	ECM #	Issue/s	Response
1	4888183	1. Commends Council on thorough approach to the issue of flying-fox camps in the Shire	1. Noted and acknowledged.
2	4876029	<ol style="list-style-type: none"> <li>1. Identifies a range of issues facing flying-foxes including habitat destruction, land use planning, education and awareness, alternate habitat creation, climate change and working with wildlife groups</li> <li>2. Recommends the use of white electric fence tape on barbed wire to prevent entanglement and injury</li> <li>3. Identifies the need to work with electricity suppliers to address any electrocution hotspots</li> <li>4. Urges Council to only consider dispersal of camps as a very last resort</li> <li>5. Promotes the importance of predicting future problem areas and opportunities for revegetation of habitat in suitable locations</li> <li>6. Promotes the value of education in addressing negative perceptions of flying-foxes</li> <li>7. Draft plan is well put together</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted.</li> <li>2. Action included in amended plan at Section 8.</li> <li>3. Action included in amended plan at Section 8.</li> <li>4. Noted – this approach is considered to be consistent with the plan.</li> <li>5. Noted – this approach is considered to be consistent with the plan.</li> <li>6. Noted – this approach is considered to be consistent with the plan.</li> <li>7. Noted and acknowledged.</li> </ol>
3	4880910	<ol style="list-style-type: none"> <li>1. Commends Council on initiative shown to develop a shire-wide camp management plan</li> <li>2. Recommends including a section in the plan, or as a management action for each camp, to consider known or potential Aboriginal cultural heritage values, including consultation with relevant Local Aboriginal Land Council.</li> <li>3. Identifies the specific amendments required to update the plan to be consistent with the new <i>Biodiversity Conservation Act 2016</i>.</li> <li>4. Recommends including a section in the plan, or as a</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted and acknowledged</li> <li>2. Action included in Section 9, Table 4, local policy updated Section 5.</li> <li>3. Section 5 Legislation and Policy updated.</li> <li>4. Section 6.1.8 Protocols to manage incidents updated in version for adoption by Council.</li> <li>5. Updates included in management options tables for each camp and Section 10.3.</li> </ol>

		<p>management action overall camp management, to draft an independent document or internal council process to address emergency, or arising or escalating camp issues, with supporting contingency planning</p> <p>5. Recommends including as part of the management options for each camp the requirement for any vegetation management to be in accordance with an approved vegetation management plan or similar. Also noted the requirement to ensure that any such works have all appropriate consent or licences.</p>	
4	4867807	<p>1. Submission in relation to Tyalgum Creek camp only</p> <p>2. Mixed response from Trustees to the proposed management action involving the establishment of additional camp habitat further away from the showground</p> <p>3. Identifies detrimental impact on showground / campground income resulting from presence of camp</p> <p>4. Offers qualified support for the plan subject to complete removal of she-oaks from along waterway.</p>	<p>1. Noted.</p> <p>2. Noted.</p> <p>3. Noted and camp background information in amended version changed accordingly</p> <p>4. Noted.</p>
5	4886054	<p>1. Identifies concern that the draft plan prioritises the conservation of flying-foxes before addressing impact to affected community members</p> <p>2. Identifies the creation of buffer zones as the obvious way to stop harm to the community from the adverse effects caused by flying-fox camps</p> <p>3. States that the plan does not demonstrate an appropriate level of empathy for people affected by flying-fox camps nor provide a balanced pathway to solve the critical needs of the community.</p> <p>4. Identifies concern that the plan does not extend its application beyond those residences immediately impacted by flying-foxes</p> <p>5. Concern with the sensitive receptor distance thresholds, corresponding risk levels and impact management actions, including with specific reference to the Tyalgum</p>	<p>1. The plan's key objectives are to respond to community concern regarding flying-foxes and to ensure positive conservation outcomes for flying-foxes. In accordance with the NSW Flying-fox Camp Management Policy, the plan aims to provide a balance between conservation of flying-foxes and their impacts on human settlements.</p> <p>2. Noted – the use of buffers is identified in the plan as a management option.</p> <p>3. Noted.</p> <p>4. The plan is for the management of flying-fox camps in accordance with a risk assessment framework. At some camps, this results in a focus on nearby</p>

	<p>Creek camp's proximity to the showgrounds</p> <ol style="list-style-type: none"> <li>6. Concern that the plan does not adequately specify triggers for transition from Level 1 action to higher level actions.</li> <li>7. Concern that the plan does not adequately address stress to humans resulting from flying-fox camps</li> <li>8. States that the plan has a bias towards maintaining flying-fox camps in-situ and requiring the community to tolerate them</li> <li>9. Claims that the draft plan fails to disclose the full definition of 'harm' with reference to the <i>National Parks and Wildlife Act 1974</i></li> <li>10. Identifies the potential significance of urban lighting on determining establishment of flying-fox camps in close proximity to human settlements and expresses concern that this is not addressed in the draft plan, including as a further research option</li> <li>11. Notes an incorrect reference to section 4.3.1</li> <li>12. States that the plan does not adequately address the requirement to protect the community and manage their concerns about adverse impact.</li> <li>13. Identifies concern that the plans stated intent to focus on education and engagement does not adequately address impacts</li> <li>14. Identifies concern that buffer zones are not adequately addressed as a useful management action</li> <li>15. Recommends that the potential period for buffer zone or dispersal work could extend into breeding season</li> <li>16. Recommends that wherever any person is at personal risk of physical or psychological harm due to the proximity of their residence to a flying-fox camp that a buffer zone must be established.</li> <li>17. Recommends that no flying-fox camp be retained where within 100 m of any building, public area, business,</li> </ol>	<p>residences. At others, consideration is given to a range of potential sensitive receptors including air-fields within a 13 km radius.</p> <ol style="list-style-type: none"> <li>5. The sensitive receptor distances and corresponding risk categories are derived from the following key references: NSW Flying-fox Camp Management Plan template, <i>Management and Restoration of flying-fox camps: Guidelines and Recommendations</i> (SEQ Catchments, 2012) and the National Airports Safeguarding Framework.</li> <li>6. The triggers for management actions are specified in Part 7 Table 2 and are aligned with the relevant risk level.</li> <li>7. Noted - In accordance with the NSW Flying-fox Camp Management Policy, the plan aims to provide a balance between conservation of flying-foxes and their impacts on human settlements.</li> <li>8. Level 3 actions (including disturbance or dispersal) can be considered in high risk situations. However, both the plan and the NSW Flying-fox Camp Management Policy acknowledge the challenges, expense, increased risk of adverse outcomes and cumulative impacts associated with camp dispersal.</li> <li>9. The relevant sections of the <i>NPW Act 1974</i> have been repealed and replaced with the <i>Biodiversity Conservation Act 2016</i>. Regardless, in addition to the</li> </ol>
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		<p>industry.</p> <p>18. Recommends that buffer zones be extended to 300 m where required</p> <p>19. Recommends that no person be compelled to use any advise provided under penalty of losing any right to the establishment of a buffer zone</p> <p>20. Recommends that any notification to Council of a flying-fox camp within 100 m of any residence, public place, building or place of commerce or industry automatically generate action to establish buffer zones</p> <p>21. Recommends research into the relationship between urban lighting and flying-fox camp establishment.</p>	<p>provisions that prevent direct harm to individual animals, the area used by flying-foxes as a camp is addressed through the legislative provisions in relation to habitat.</p> <p>10. The potential significance of this issue is noted. As identified in the plan, Council will support and participate in relevant research that improves knowledge of flying-fox ecology.</p> <p>11. Addressed in version for adoption by Council</p> <p>12. Noted.</p> <p>13. Noted.</p> <p>14. Noted – the use of buffers is identified in the plan as a management option.</p> <p>15. This is not consistent with the NSW Flying-fox Camp Management Policy or best practice.</p> <p>16. Noted.</p> <p>17. This is not feasible or realistic as it would require all camps (apart from Terranora Broadwater) to be dispersed, with the requirement to remove all vegetation from every site as the only guaranteed way to prevent re-establishment of camps.</p> <p>18. 300 m buffers are identified in the plan as the ideal to fully mitigate amenity impacts. Any new buffers, or improvement of existing buffers, will aim to achieve the greatest distance practicable.</p> <p>19. Noted – the plan does not propose any</p>
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			<p>such penalty</p> <p>20. As noted at (17) above, all but one of the existing camps are within 100 m of human settlement. Provisions identifying the process and options for new camps are included to the plan.</p> <p>21. As identified in the plan, Council will support and participate in relevant research that improves knowledge of flying-fox ecology.</p>
6	4913015	<ol style="list-style-type: none"> <li>1. Submission received after closing date for comments (21 November 2017)</li> <li>2. Refers to 'Critique of Draft Flying Fox Camp Management Plan' (ECM# 4886054) to be considered as submission by the TDCA</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted</li> <li>2. Response to issues identified by Peter Bennett provided above.</li> </ol>
7	4897575	<ol style="list-style-type: none"> <li>1. Primary care group for flying-foxes in Tweed Shire attending to around 130 flying-fox rescues per year. Most rescues involve entanglement and injury/death from barbed wire or netting</li> <li>2. Support offered for the objectives of the plan (to the extent that there is no weakening of protection for flying-foxes or their habitat)</li> <li>3. Reiterates that bats do not present a risk to human health where the vaccination schedule is followed</li> <li>4. Notes change to biodiversity legislation since preparation of the draft plan</li> <li>5. Proposes that the Uki (Rowlands Creek) camp may qualify as a nationally important camp if currently available data was more comprehensive</li> <li>6. Strong support for the standard measures to avoid impacts associated with management activities</li> <li>7. Identifies the categorisation of risk categories as vague</li> </ol>	<ol style="list-style-type: none"> <li>1. Noted.</li> <li>2. Noted and acknowledged.</li> <li>3. Noted. This issue is a key component of the plan's education and engagement strategy.</li> <li>4. Addressed in version for adoption by Council – see response to OEH submission above.</li> <li>5. Noted – opportunities to update existing data set are limited as timing and methods as per the National Flying-fox Monitoring Programme.</li> <li>6. Noted and acknowledged.</li> <li>7. The sensitive receptor distances and corresponding risk categories are derived from the following key references: NSW Flying-fox Camp</li> </ol>

	<p>and unscientific.</p> <ol style="list-style-type: none"> <li>8. Strongly support the conservation and education strategies of the plan.</li> <li>9. Appreciative of the comprehensive camp information compiled and presented. Note that TVWC can assist through providing additional information received through their operations</li> <li>10. Note that there is no commitment to notify TVWC of any proposed camp management activities</li> <li>11. Discuss issue associated with proposed disturbance activities at Bray Park</li> <li>12. Identify a need for further information on any future decisions to disperse camps including in relation to delegation and specific triggers such as numbers of complaints or reported loss of income</li> <li>13. Identify a need for further and more detailed information of the submissions received during the targeted consultation phase of the plan development</li> <li>14. Notes a concern that the NSW Flying-fox Camp Management Policy does not require adequate environmental assessment of proposed dispersal actions.</li> <li>15. Requests access to any list of noise and smell mitigation measures that Council develops to enable consistent provision of this information to the community through the wildlife hotline.</li> <li>16. Seeks a coordinated approach and support from council to manage heat stress events. Also recommends the installation of a sprinkler system at Tyalgum Creek camp for use in extreme weather events.</li> <li>17. Notes that the plan does not specify the requirement to have a bat that has bitten or scratched a person be autopsied to confirm disease status. Seeking advice from Council on confirmation of procedure to do so.</li> <li>18. Identifies the significant impact of barbed wire and fruit</li> </ol>	<p>Management Plan template, Management and Restoration of flying-fox camps: Guidelines and Recommendations (SEQ Catchments, 2012) and the National Airports Safeguarding Framework.</p> <ol style="list-style-type: none"> <li>8. Noted and acknowledged.</li> <li>9. Noted and acknowledged. Camp histories have been revised and updated where information is available.</li> <li>10. Requirement to notify licensed wildlife carer prior to beginning any level 2 and 3 actions is stated in Section 10.3.2.</li> <li>11. Management options at Bray Park camp revised for clarity.</li> <li>12. Level 3 actions (including disturbance or dispersal) can be considered in high risk situations. No high risk situations are currently identified in the plan. Risk assessment criteria are detailed at Section 7, Table 2.</li> <li>13. The outcomes of the targeted consultation are detailed at Section 2.3 of the plan.</li> <li>14. Noted.</li> <li>15. Noted. Information to be shared with wildlife care groups as identified in Section 8 Conservation Strategy.</li> <li>16. Noted. Commitment to communication and Council support in relation to heat stress events is identified at Section 8. Council support will be provided with regard to industry-recognised best practice.</li> </ol>
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	<p>netting entanglement. Notes that this occurs not only in rural settings but also on security fences, including at TSC facilities.</p> <p>19. Recommends an online portal for sharing data and information regarding flying-fox conservation and camp management.</p> <p>20. Identifies overall support for the aims and methods of the plan, including with regard to habitat protection and the critical requirement for land use planning to prevent future conflict.</p> <p>21. Requests inclusion of TVWC logo and contact information on any interpretive material prepared by Council.</p> <p>22. Requests that flying-foxes be removed from the list of environmental health section of council's webpage.</p> <p>23. Requests that council ensure that TVWC is provided all relevant interpretive and educational material so that consistent information can be provided to the community.</p> <p>24. Identifies a range of information exchange requests including:</p> <ul style="list-style-type: none"> <li>a. Online portal as per (19) above</li> <li>b. Research project details</li> <li>c. Proposed camp management actions, including specifically for the Toolona Avenue camp and any Level 3 actions.</li> </ul> <p>25. The following items in relation to heat stress events are requested:</p> <ul style="list-style-type: none"> <li>a. Supply of bins for counting and disposal of dead flying-foxes</li> <li>b. Closer liaison with council leading into summer, including an annual planning meeting with relevant council staff</li> <li>c. Installation of a sprinkler system at Tyalgum Creek camp as per (16) above</li> </ul> <p>26. Recommends the following risk management actions be</p>	<p>17. Direction is provided in Appendix 1 of the plan regarding the appropriate response to flying-fox bite or scratch.</p> <p>18. Noted. Included in plan at Section 8.</p> <p>19. Noted. Ongoing communication between Council and wildlife groups is an action in Section 8.</p> <p>20. Noted.</p> <p>21. Noted. Contact details will be included on relevant signage and education materials, as detailed at Section 9 Education and engagement strategy.</p> <p>22. Noted.</p> <p>23. Noted. Will be addressed through ongoing communication between Council and wildlife groups as identified in Section 8 Conservation Strategy.</p> <p>24. Noted. Will be addressed through ongoing communication between Council and wildlife groups as identified in Section 8 Conservation Strategy.</p> <p>25. Noted. Operational requests will be considered outside of the Management Plan. See response to 16 above regarding heat stress support.</p> <p>26. Amendment made to Section 8 as an action to reduce urban mortality.</p>
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		<p>implemented:</p> <ol style="list-style-type: none"> <li>a. Actions taken to reduce mortalities resulting from barbed wire and fruit netting entanglement</li> <li>b. Actions to reduce mortalities in any specific hotspots</li> <li>c. Wildlife friendly fencing at Council-managed facilities</li> </ol>	
8		<ol style="list-style-type: none"> <li>1. Add specific recognition of funding support from NSW Office of Environment and Heritage and Local Government NSW to final document.</li> <li>2. Early dispersal is a level 3 action, but no pathway currently exists in the plan for using this action unless new camp is within 5m of residential (level 3 in extreme cases) or &lt;3km of aerodrome</li> <li>3. Update camp summary data to include results of NFFMP census to end 2017 for all camps</li> <li>4. Update background information to include actions completed since preparation of draft plan including public exhibition and council resolutions</li> <li>5. Expand on land use planning section to identify appropriate separation distances between flying-fox camps and new development</li> <li>6. Amend legislation section to address all relevant <i>Biodiversity Conservation Act 2016</i> provisions</li> </ol>	<ol style="list-style-type: none"> <li>1. Addressed in version for adoption by Council.</li> <li>2. This is consistent with NSW Flying-fox Camp Management Policy. Categorisation of risk in this scenario should consider potential proximity and risk.</li> <li>3. Updates have been included into the plan.</li> <li>4. Updates have been included into the plan at Section 1.3.</li> <li>5. Updates have been included into plan at Section 6.1.</li> <li>6. Legislation section (5.2.3) has been amended to incorporate relevant BC Act detail, including BC Act provision for licensing of harm and definition of habitat.</li> </ol>