

29th November 2024

Wildlife Rehabilitation Review Team
Attention: Ms Trish Doyle MP
Parliamentary Secretary for the Environment
E: review.wildliferehab@environment.nsw.gov.au

RE: Wildlife Rehabilitation Sector Review 2024

Thank you for the opportunity to comment on this Review.

Animal Care Australia Inc. represents the interests of all hobbyist and pet animal keepers nationally. Our members are comprised of most major animal keeping representative bodies including those representing dogs, cats, birds, horses, small mammals, reptiles, fish and exhibited animals. Some individual members work in the rescue, care, and rehabilitation sectors.

Animal Care Australia Committee members have personal experience having worked within the relevant sectors and have direct interactions with carers in NSW. Accordingly, some of our responses within this submission are based around that lived experience and the strongly expressed views of those carers who have voiced their reluctance to provide personal submissions through fear of retribution.

While there is a set of Terms of Reference for this Review, we believe the carers and the wildlife rehabilitation organisations are better placed to respond directly. Instead, Animal Care Australia is providing a broader overview as a response.

Animal Care Australia’s feedback:

Animal Care Australia notes the ‘*Messages that have been heard*’ responses within the Discussion Paper appear to be focused on creating one big sector.

Having recently sighted the new constitution for WIRES it is clear that is the goal of the WIRES Directors and this is not supported by a good proportion of the carers on the ground or by Animal Care Australia. It is almost as if WIRES not only drafted the Discussion Paper but the Terms of Reference as well.

In fact Animal Care Australia supports the exact opposite. It is our strong recommendation that more organisations and individuals should be permitted to be established. Competition is healthy – exclusivity is not.

This apparent objective by WIRES to be the peak body overseeing the rescue and rehabilitation of native wildlife is in our opinion fraught with danger.

Again we find the scenario where government is turning to charitable organisations in order to carry out the ‘hard’ work that is rightly the governments’ responsibility.

In the same way as the government keeps its hands clean from the criticism and ugliness of animal cruelty issues by ‘contracting’ animal welfare enforcement to charitable organisations it is again foregoing its responsibility to native wildlife.

A government that doesn’t want to be seen as responsible for euthanising thousands of pet dogs and cats each year is equally happy to let volunteer carers euthanise the cuddly, furry, scaly and feathered native wildlife, through a process of permitting charitable organisations to be responsible.

What is the most concerning aspect of this scenario (which has been allowed to exist for decades) is the lack of direct accountability and transparency by the said charitable organisations – particularly the RSPCA and WIRES. Two charitable organisations that work with native wildlife, and collude in order to advance their own agendas.

While the carers are held accountable for every action and it seems even for every expense – despite the majority of those coming out of their own pockets - the executive of these two organisations is not. It is time that is stopped.

It is time the government accepted its responsibilities and introduced the appropriate measures to oversee all aspects of wildlife rehabilitation, and in this case, there needs to be a broadening of the concept of the NSW Wildlife Council rather than the acceptance of whatever WIRES wants – WIRES should get.

The continued exclusivity of not being able to be a carer in an area where WIRES is active without mandatory membership of WIRES is simply ludicrous. This is especially true of recent times where a good proportion of WIRES carers have either left or have been pushed out because they do not agree with the directions of that organisation. The treatment of those carers is abhorrent.

The government needs to take far greater notice of the feedback from those on the ground than those sitting in the executive and director roles pocketing from the generosity of the funds donated by the public.

Lack of funding – albeit money is there just not adequately distributed:

It has been 5 years since the devastating 2019-2020 bushfires where tens of millions of dollars were donated for the specific purpose of providing rescue and care for native wildlife.

Carers were not provided with this funding unless they applied via a rigorous application process. That funding was minimal and went nowhere near covering the yearly expenses of the carers. Five years later and there is still more than two-thirds of the money donated being held by WIRES.

The new constitution of WIRES implies there will be no guarantee that funding will make its way out to the sector where it is needed. The stronger likelihood is it will be used to expand the organisation into a national based ‘enforcement’ agency. Enforcement of animal cruelty is not and should not be the responsibility of a rescue, care and rehabilitation of native wildlife organisation. Enforcement of the carers equally should not be handed over to one single entity that is a charitable organisation.

A more cohesive voice and balanced sector:

To this end, Animal Care Australia not only supports the establishment of the NSW Wildlife Council but would welcome it having a greater role within the consultation processes of the department and the government. Far too much reliance on the agenda and opinions of WIRES is being afforded.

Training and greater carer coverage:

Animal Care Australia would like to see the components of training of all carers to be overseen by the government and regularly reviewed by not only the government and the carer sector but other animal welfare stakeholders. The training should continue to be run by the primary organisations – but these organisations should be listed as supported/approved by the department.

To address the inequity between training of carers, distribution of carers, and coverage of wildlife specific carers, Animal Care Australia makes the following recommendations:

1. The exclusivity of WIRES only zones should cease immediately.
2. License condition 1a for the requirement for carers to be a member of a wildlife rehabilitation group should cease. This should not be mandatory but encouraged.
3. The training and continued updating of training of all carers should be accessible via any ‘approved’ by the department. This should be modelled in the same way as the current ‘reptile catcher’ and ‘venomous handling’ sector.
4. All wildlife rehabilitation licenses should be issued to the individuals AND not to the wildlife rehabilitation groups. License holders would then be free to join any wildlife rehabilitation groups of their choosing and subject to approval by that group.

5. The regular reporting and overseeing of license holders should be directly with the department and not via the wildlife rehabilitation groups.
6. A regular training requirement should be included within the 'renewal of license' criteria for all license holders – no matter their experience.
7. The Government must provide improved direct access and support for carers needing assistance with mental health strain, particularly during and following natural disasters.
8. The Government and department must provide greater education to the public of the roles of the wildlife rehabilitation groups in an equal and inclusive manner.
9. Funds raised by any wildlife rehabilitation groups must be utilised for the purpose they were donated for and where this is not the case that expense should be made public by the NSW Government and not reliant solely on the public needing to access ASIC, ACNC reports or to search for financial reports on wildlife rehabilitation group websites.

Animal Care Australia strongly believes Recommendations 3 through 5 will reduce the incredible ability of certain executive and organisations to hold power and intimidation over the sector, making for a more inclusive, friendly sector.

Gaps in the sector can be more easily filled by allowing individuals to operate in those zones. Whether they be general or a species specific wildlife rehabilitation license holder. This has been done most recently with the issuing of a flying fox and bat license in the upper north coast.

Rather than having large organisations trying to cover great expanses (footprint) such as the closure of the Broken Hill Rescue & Rehab Group which saw several carers no longer able to continue and WIRES eventually stating they would find a way to cover the area, the ability for individual carers to continue on without needing to be a part of an existing organisation is vital. More smaller groups should be encouraged by the department and not limited. Individuals could still attach themselves to other Groups that are 1000s kilometres away in order to gain support without the need to join them. Ultimately these current breakaway carers from WIRES who want to simply continue to care for the wildlife should have the availability of establishing a new group with the support from the department and not the ridicule, intimidation and shame they are currently experiencing.

Individual carers would be incentivised to join a wildlife rehabilitation group to access support and some funding.

Veterinary workload:

The Inquiry into the veterinary workforce shortage highlighted far too many native animals are being handed off directly to vets under current programs being run by WIRES. Unless an animal is injured the animals should make their way directly to an experienced carer who can ascertain whether further veterinary care is required or whether the animal is simply an escaped pet or disorientated and the appropriate steps then taken.

We train the carers for a reason and we have vets for a reason – both should not be used as baby-sitters. The current WIRES system, appropriately referred to by others as 'uber for wildlife' is simply ridiculous, and is creating a greater and unnecessary workload for our veterinary sector.

Administrative strain and record keeping:

It is our understanding there is a burdensome reporting requirement by the department. This not only ties up volunteering hours but adds major expenses to the organisations, especially where development of programs and applications has become necessary in order to meet that requirement. It is our belief that this would be reduced if each individual carer was required to report directly to the department – in the same manner as those holding other licenses such as snake-catchers, native wildlife keepers etc.

The burden of the cost in ensuring the responsibility and accountability of the sector should sit directly with the department and not the volunteers or the rehabilitation sector organisations. This would not necessitate any requirement by the sector who may want their members to report to them but it would

centralise the reporting process and most likely result in a reduction of unnecessary red-tape and bureaucracy when the department are held responsible. After all if they have to do the heavy lifting they will want to do less of it.

Funding and fundraising:

WIRES should be made handover the remaining \$60m (approx.) they received from the public in 2019/2020. This should be transferred into a trust overseen by representatives of all the main wildlife rehabilitation groups. This money should be equally distributed to the carers on the ground and accessible by the veterinary practitioners who treat native wildlife. It is simply unfathomable that this money is still being withheld 5 years down the track, especially when we have a cost of living crisis and the volunteers are struggling far more than before.

No future without significant change:

This is a sector that is falling apart and it is doing so because of the monopoly and autonomy of certain organisations that has until now continued to go unchecked, where intimidation and subsequent fear of retribution is prevalent.

This paints a disheartening picture of the level of influence WIRES has and draws us to a conclusion that a Review into the Sector is less warranted than a Review (such as a Parliamentary Inquiry) into the Executive and Management of WIRES, which is far more important – particularly given the strong indication the Government is believed to be considering making WIRES the over-arching organisation responsible for the management of the entire sector.

Should you require further details please do not hesitate to reach out as we would be happy to meet with you, and discuss this matter.

Kind regards,

A handwritten signature in black ink that reads "M Donnelly". The signature is written in a cursive, slightly slanted style.

Michael Donnelly
President and Native Mammals Representative
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About Animal Care Australia

As a nationally recognised animal welfare organisation, Animal Care Australia encourages continued development of animal welfare standards and Codes of Practice for animal husbandry, breeding, training, sale, and sporting exhibitions for a wide range of animal species, including pets, animals used for educational or entertainment purposes or kept for conservation, and in particular native birds, reptiles, and mammals.

Animal Care Australia was founded in early 2018 to establish an organisation run solely by volunteers to lobby for real animal welfare. With extreme animal rights and animal liberationist ideologies influencing government legislation, regulation, and policy at our expense and to the detriment of our animals and pets, it has become necessary to provide government with a balancing voice.

By uniting the broad spectrum of animal groups, collectively we offer an experienced, sensible approach to animal welfare.

By educating our members and the public about the importance of treating animals with kindness and respect for their needs and promoting the humane treatment of animals to improve animal welfare outcomes, Animal Care Australia is in the unique position of lobbying and advocating for all animals within our care.

Animal Care Australia provides priority to the following:

- advocating for stronger welfare outcomes
- advocating to increase education of the public in animal welfare and best care techniques
- educate the public on handling their animals with kindness & respect and the importance of their needs
- educate the public in the differences between animal welfare and animal rights