



COMMENTS – GLOSSY BLACK COCKATOO DRAFT ACTION STATEMENT

General

Thank you for the limited opportunity to comment on this plan, however we strongly object to the 10 day consultation process targeting a small handful of people/groups invited to read, digest and make meaningful comment on a hastily drawn up plan.

Normally this is a 4-5 week period. The fact that this threatened bird has been listed for almost two decades without having any legislated protection is a damning indictment on the commitment of this government to take threatened species protection seriously.

The delay in producing a workable Action Statement while continuing clearfelling and burning of the Glossy Black Cockatoos habitat (since it was first listed in 1995) has almost certainly meant its Victorian population has diminished to an even more precarious state. Due to lack of funding and monitoring, its population could in fact now be critically endangered in this state. Its belated Action Statement will need to be very unambiguous and solid as to what CLEAR actions MUST be taken to protect the habitat of those which are remaining, and HOW it is intended to do this with WHAT resources.

A senate inquiry into the effectiveness of threatened species and ecological communities' protection in Australia released its final report recently. The inquiry concluded that:

- *“recovery plans are not implemented and/or are not given sufficient funding to effectively implement them (by both Commonwealth and state and territory governments)”;*
- *“both conservation advices and recovery plans (should be) funded, implemented, monitored and reviewed”;* and
- *“there needs to be a clear avenue for funding of activities under recovery plans and conservation advices.”*

A well resourced, identified and understood funding stream for threatened species recovery is what DEPI must commit to.

FFGA

Section 19 (1) of the act requires the secretary to draw up an Action Statement 'as soon as possible' after a species or community is listed. We hope that the other 373 species are also now in line for being fast-tracked for an Action Statement.

The FFG Act exists to:

guarantee that all taxa of Victoria's flora and fauna other than the taxa listed in the Excluded List can survive, flourish and retain their potential for evolutionary development in the wild.

The Glossy Black was put on the list because it was and still is:

in a demonstrable state of decline which is likely to result in extinction or if it is significantly prone to future threats which are likely to result in extinction.

The suggested actions included in the draft Action Statement fall far short of those needed to ensure protection of this species and its habitat.

Action statements are to be written so as to give clear and specific guidance to protection of a species or community. This objective would be extremely difficult to achieve if there is no funding allocated for research to determine what effective actions are needed to protect a species.

DRAFT ACTIONS

There is still more to be understood about the habits of the Glossy Black, such as which feed trees they prefer, how far they range, what the impacts of fire are on them and so on. Without decent research and knowledge of the species, DEPI is unable to write an effective protection plan unless it fully incorporates the Precautionary Principle.

The loose terms such as 'significant' stands of feed trees need to be more clearly defined. It also needs to be made clear who determines these areas that are to be protected from burning and logging and what qualifications they should have. Without this being stipulated, the actions are wide open for abuse and convenient misinterpretation.

Under 'targets':

All confirmed nest sites are protected from planned burning activities, timber harvesting and new roading.

This target sounds effective but is similar to stating that all confirmed kindergartens and schools will be protected from bombing raids – but of course there is never

anyone asked to identify these sites in a war zone. Therefore the bombing of unconfirmed kindergartens and schools is perfectly acceptable.

Funding and resources must be provided to search for nest sites in the appropriate season – with a priority being on areas planned for logging and burning.

Damage to stands of Black Sheoak by planned burning activities, timber harvesting and new roading is avoided entirely or minimised.

This is a nonsense target. "...*avoided or minimised*". Which is it? And what is considered minimal? Less than total destruction or 90% destruction could be considered minimising damage. Even 30% minimisation of destruction is unacceptable for a species which has been shown to be "*in a demonstrable state of decline which is likely to result in extinction*".

All sites with records of Glossy Black-Cockatoo have been highlighted during planning processes and advice provided to mitigate potential threats arising from land management practices in these areas

Again, this is a nonsense action as there are very few records, and no funds committed to identifying where Glossy Blacks occur.

No habitat elements identified for protection from fire are lost due to planned burning.

The acknowledgment that planned burns are a threat to this bird is welcome. However with Sheoaks being extremely vulnerable to fire, with the lack of evidence that burning is necessary or effective in these forests, and the recent questioning by Neil Comrie of the 5% target, planned burns must be totally excluded from the potential and known habitat. Vast areas of Black Sheoak in Far East Gippsland have already been destroyed due to planned burns and logging. More planned burns, clearfelling and thinning operations where Sheoak is regenerating must be immediately halted.

PRECAUTIONARY PRINCIPLE

Given the lack of reliable scientific knowledge regarding the parrot and its habitat, burn plans should be prohibited in areas of Sheoak or mature and old growth forests where Sheoak exists. This should be the case at least until further research is carried out and the Action Statement reviewed in five years time.

Logging operations, thinnings and roading must also be prohibited in all areas which are potentially important habitat sites – at least until it can be proven otherwise after adequate (multiple) surveys are carried out by qualified biologists.

CONCLUSION

After years of guidelines, laws and prescriptions being weakly enforced and misinterpreted for financial gain above environmental protection, the public has lost trust in the government's commitment to threatened wildlife. Vague statements and prescriptions try to reassure us but have been shown to be ineffective. Australia's rare wildlife continues to spiral downwards with contemptible disregard by our elected governments and land managers.

It is timely that this very subject was aired on the ABC's [Radio National Breakfast show](#) today (Friday 30 August 2013 8:41AM)

It is deplorable that protection measures are almost tailor made to guarantee no effective change. They allow loose or ambiguous prescriptions to be disregarded. As a result, under our only threatened species legislation, the state's responsibility to ensure wildlife '*can survive, flourish and retain their potential for evolutionary development in the wild*' has been ignored or applied with faint-hearted duty.

It is also tragically ironic or sardonic that this tokenistic consultation period is just a week short of National Threatened Species Day, and has only surfaced after threat of court action.

The tragic finality of the extinction of a whole species overshadows the loss of an insignificant manufactured empire in the tiny timeframe of a human lifespan in one small pin point on the map of Australia.

EEG strongly suggests that the Draft Action Statement for the Glossy Black Cockatoo be strengthened to ensure it is an effective tool under the law, rather than another glaringly feeble failure at protecting our state's remarkable environmental values.

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