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13<sup>th</sup> August 2008

Dear Paul

### **Draft Flora and Fauna Guarantee Action Statements**

Bird Observation and Conservation Australia (BOCA) welcomes the opportunity to comment on DSE's draft Action Statements (see below). BOCA believes that the provision of adequate funding to implement intended management actions is critical to ensuring the future of these threatened species.

#### **Regent Parrot**

BOCA believes that throughout the document the expression 'trapping of Regent Parrots for the avicultural trade' should be altered to read the '**illegal** trapping of Regent Parrots for the avicultural trade' to emphasise the protected status of the species.

Within the tables, there are a few awkward sentences, particularly under 'Habitat loss, fire intensity' and 'Loss of important habitat features, timber harvesting'. The latter needs to be changed as indicated below.

*'Over many decades there has been successive removal of large old trees which were (our addition) approaching a size where they would be suitable for nesting ~~has been taking place over many decades.~~*

Under 'Intended Management Actions', one of the standard objectives is to increase the extent of habitat, yet the explanation emphasises protection and restoration of existing habitat rather than any direct action to increase the area of available habitat.

Given that feral honey bees are known to compete with Regent Parrots for nesting hollows, the action plan should list 'removal of honey bee hives' along with 'undertake threat monitoring'. There is little point in monitoring a threat if there is no clear commitment to reducing it.

#### **Fairy Tern**

Given that Fairy Terns nest on beaches, changes in sea level or increased storm activity may be major threats to their long term survival. This should be mentioned in the section on 'Threats' (as per the draft Action Statement for Hooded Plover).

The Action Statement details the potential for Fairy Terns to abandon nesting sites when disturbed by foxes, dogs or humans. While the Action Statement lists the action 'control/reduce human disturbance' (including dog control), there is no mention of monitoring or controlling the impact of foxes on Fairy Tern colonies.

A major gap in our knowledge of Fairy Tern biology/ ecology is the relationship between breeding and non-breeding colonies and their distribution. Increased knowledge of the movement of Fairy Terns in the non-breeding season would allow us to identify whether there are any threats occurring over this period.

### **Malleefowl**

Under 'Past management actions' and 'involve community groups and volunteers in recovery activities', more detail is required on how the 'result' fits in with the 'action'. Was the action primarily aimed at increasing the area of private land managed for Malleefowl conservation or were other community activities undertaken?

Have attempts been made to monitor the success of corridor revegetation in allowing Malleefowl to move between remnants? If this action is to be considered in other areas, it would be useful to understand the extent to which Malleefowl actually use these corridors and whether they increase the risk of fox predation through their high edge/area ratio.

Under 'Intended management actions' and 'Liaise with private landholders' there is potential to involve Trust for Nature in liaisons with private landholders, particularly those with voluntary conservation covenants on areas that may contain suitable Malleefowl habitat.

### **Black-eared Miner**

Under 'Threats, General Overview', the meaning of the third sentence in the third paragraph, 'In addition, ...', is unclear. This may need re-wording to clarify the linkage between fire suppression and the risk of wildfire.

Given the potential for feral herbivores, particularly Goats, to contribute to habitat loss (as acknowledged in the 'Intended management actions'), should grazing by feral herbivores be listed under 'standard threats'?

Under 'Intended management actions' and 'control introduced animals': Is there any information on the extent to which Black-eared Miners would use linkages between larger habitat blocks given that Black-eared Miners like continuous tracts of old-growth mallee? Is this likely to be a useful action for Black-eared Miners? Should this be investigated? Any information to support protection of 'linkages' would then become the basis of community education and awareness programs, particularly aimed at landholders/ government agencies responsible for these remnant linkages.

### **Major Mitchell's Cockatoo**

Under 'Past management actions', 'Undertake detailed population monitoring and collect demographic information': it is a bit misleading to state that the number of occupied nests fell from 64 to 11 or 17 when elsewhere in the document it is stated that ~half of the 64 nest sites were lost through loss of nest trees rather than 'abandonment' of nest sites.

Under 'Past management actions', 'assess threats': which 10 year period does the document refer to? Under 'conduct enforcement activities' it states that nest robbing was a major activity up until 1991, clearly not in the last 10 years. This needs clarification.

A major threat to the survival of Major Mitchell's Cockatoo is the declining number of and/or increased competition for suitable nesting hollows. Given the long period of time required for formation of suitable hollows (more than 100 years for *Callitris* spp.), will DSE be involved in further attempts to develop artificial nest sites; in particular, to develop artificial nests with thermal properties that more closely match those of preferred natural hollows?

The Action Statement details the potential for feral honey bees to reduce the number of nesting hollows, however there are no 'Intended management actions' aimed at monitoring or reducing this threat.

### **Plains-wanderer**

Under 'Threats', 'Competition': the meaning of the phrase 'Weed invasion is dominating habitat and affects the structure required by the birds and compete with preferred seed plants' is unclear. This needs clarification.

Under 'Past management actions', 'Involve community groups and volunteers in recovery activities': it is not clear whether community spotlighting events are purely aimed at raising community awareness or part of organized surveys. How do these activities relate to recovery?

Given the high cost of acquiring land for addition to the public conservation reserve system, the importance of achieving sympathetic management of habitat on private land cannot be overstated.

Under 'Intended management actions', 'Negotiate voluntary manage

nt agreements with private landholders': the role of organisations such as Trust for Nature in achieving this objective should be acknowledged.

### **Regent Honeyeater**

No specific comments.

### **Hooded Plover**

Under 'Intended management actions', 'to increase community support' the role of birding groups such as BOCA and Birds Australia in producing educational materials and promoting community awareness of the threats to Hooded Plovers should be acknowledged.

BOCA hopes that the above comments are useful and look forward to the final release of the Action Statements. If you wish to have clarification or further information please contact BOCA's Conservation Officer, Dr. Jenny Lau on 9877 5342 or email [conservationprojects@birdobservers.org.au](mailto:conservationprojects@birdobservers.org.au).

Yours sincerely

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