



15 August 2009

Referral Section EPBC Act  
Approvals and Wildlife Section  
Department of Environment, Water, Heritage & the Arts  
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Dear Sir/Madam

**Re EPBC ref no 2009/5027 Department of Agriculture and Food (WA) Natural resources management/Perth metropolitan area/WA/ Eradication of the European House Borer, PMA WA.**

The Urban Bushland Council WA wishes to comment on the proposal named above and referred to the DEWHA under the EPBC Act. We are most concerned about the proposed removal of tens of thousands of hectares of pine trees as proposed by the Department of Agriculture, and Food. The pine trees provide food for the endangered Carnaby's Cockatoos and possibly for other species of cockatoo. We now add additional comments and thank you for the opportunity to do so.

The European House Borer Emergency Pest Response Plan was initiated by the Department of Agriculture and Food, in 2004. We would suggest that it would have been helpful if the matter of food sources and survival of cockatoos had been considered. The feeding habits of Carnaby's Cockatoo have been known for many years.

**A.) Program of replacement of food resources for Carnaby's Cockatoo.**

Carnaby's Cockatoos (listed under the EPBC Act as endangered or are a Perth icon species and their numbers are in serious decline due to loss of habitat. Now pine removal is a disaster for them as it will eliminate a significant feeding habitat which has become necessary for their survival because of the extensive clearing of natural feeding habitat especially Banksia woodlands and Eucalypt forests. Apart from the removal of pines to control and eliminate the EHB, the pines are also proposed for destruction because of the overdraw of water on the Gnangara Mound. Under the Gnangara Sustainability Strategy alone, 22 000 hectares of pines are proposed for removal. [Gnangara Sustainability Strategy, Bulletin 14. August 2009]

We support the maintenance of buffer zones around areas of infestation of the EHB, rather than the blanket removal of plantations.

Over the last ten years thousands of hectares of feeding habitat has been cleared and the statistics of how much clearing has occurred and is occurring are not available. This is critical information

which should be used before any decision or conditions are made for this proposal. This information should be forthcoming from the state government.

The clearing of pine trees as proposed is a further assault on top of the clearing of native bushlands. We have been informed [Glenn Dewhurst pers comm.2009] and from our observations have seen that Carnaby's Cockatoos are hungry and are increasingly moving into gardens and different species, seeking food.

The GSS Bulletin 14, states that; **“the presence of plantation pine in Perth has influenced the distribution patterns and abundance of Carnaby's black-cockatoos for almost eight decades. This period has also seen the population size of the species decline by more than one-half.”**

### **B.) Examples of the effect of removal of pine trees on Carnaby's Cockatoos**

The effects of removal of pines from areas used by Carnaby's Cockatoos are indicated by two examples as cited by Geoff Barrett. Mr Barrett is the Regional Ecologist, Swan Region, DEC, and has designed and is co-ordinating the Carnaby's cockatoo roost surveys in WA in collaboration with Birds Australia. Surveys started in March 2009. Counts of cockatoos at roosting sites show the decline in numbers of cockatoos roosting at those sites after removal of pine trees.

- 1.) Roost site HF 25 was being used by 600 birds [Carnaby's Cockatoo] in October 2008 and has since had around 5ha of pines removed for the construction of a pipeline. In 2009, only a small number of birds now remain at this site.
- 2.) Roost site R2 was being used by over 2000 birds in 2006. An area of pine trees was cleared following fire damage adjacent to the roost site. In 2009 birds were no longer recorded at this roost. [pers comm; Geoff Barrett., 28.7.09. For site identification contact Geoff Barrett, DEC, 9423 2907 [Geoff.Barrett@dec.wa.gov.au](mailto:Geoff.Barrett@dec.wa.gov.au)]

Some key conclusions from the study *Pines and the ecology of Carnaby's black-cockatoos.....in the Gngangara sustainability strategy study area* on behalf of the Forest Products Commission by Hugh Finn, Murdoch University, William Stock, Edith Cowan University, and Leonie Valentine, DEC, are that;

- “There is uncertainty about whether the remnant native vegetation in the GSS will provide an adequate food source following the removal of pine plantations.”
- The pine is the main food source for Carnaby's black-cockatoos within the GSS area during the non-breeding season (January to June)
- The importance of tall mature pine stands for roosting habitat. Carnaby's black-cockatoo requires tall trees over 15 metres with large crowns for roosting. A requirement that had been previously performed by the native Marri and Tuart forest prior to their clearing and fragmentation as Perth developed over the last century.
- Given the lack of information on the seasonal availability of food for this species, a precautionary conservation step would be the retention of some form of pine.”

### **C.) Remove dead trees, logs and branches to control the EHB. Monitor live trees for any EHB presence, legislation required to use only treated pine in buildings.**

The EHB Response document states that; “The surveillance data suggests that the incursion in WA has been detected before the borer has made the transition from the ‘external’ dead tree environment to the ‘internal’ structural timber environment”. This is very fortunate. As “More than 90% of infestations in WA have been found in dead pine trees, logs and branches,” we suggest that

the eradication program targets dead trees, logs and branches' and live trees (which may contain dead incursions) be monitored. We realise that millions of trees are involved. If this is not possible then we again suggest the use of buffer zones. We are not being flippant in making this suggestion, but the alternative of eradication of large areas of pine does not allow for factors seemingly not considered. Such factors include as stated, loss of food for Carnaby's Cockatoos and loss of carbon from trees into the atmosphere. The argument by the Water Corporation that the water table will rise after the removal of pines is treating the symptom, not the disease. The disease is over utilisation of water from the Gngangara mound in a drying climate.

Builders are not required to use treated pine in buildings. This should be a requirement by law.

## CONCLUSION

### *The UBC recommends that:*

1. No further clearing of Banksia woodland, and forest communities that provide feeding or roosting habitat for Carnaby's Cockatoos be permitted. In other words that there be a moratorium on clearing on the Swan Coastal Plain. This is a crisis for Carnaby's Cockatoos
2. An education program be designed and implemented to educate the public on the importance of maintaining and enriching the environment so that Carnaby's Cockatoos can survive into the future
3. Twice the equivalent replacement feeding habitat be planted **ahead of clearing pines** - how much will depend on the species planted. A variety of species is necessary.
4. Local Government Authorities and home gardeners and others be encouraged to plant food species such as *Banksia prionotes* if they are on Karrakatta landform; *B. menziesii* on Karrakatta, Bassendean, Cottesloe, Beehmullah, Yanga, Forrestfield landforms (refer plant sp list p 82 - in *Growing Locals* by Robert Powell & Jane Emberson 1996.) Also some Hakeas and of course Jarrah, Marri etc  
Perhaps thousands of these seedlings could be grown with a government incentive – within a creative public campaign. Fore example Local Government Authorities could plant *Banksia prionotes* as street trees and in parks.
5. These recommendations be integrated into the Recovery Plan for Carnabys Cockatoo

The UBC appreciates the opportunity to comment on this matter.

Yours faithfully

C Mary Gray  
President

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