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Dear Mr Dutkiewicz

Non-compliance with Recovery Plan for Carnaby's Cockatoo: removal of critical roost and foraging habitat at Gngangara Pine Plantation, WA.

Summary

The current loss of critical habitat by clearing 1,000 ha/year of the Gngangara pines contravenes the federal Recovery Plan for Carnaby's Cockatoos.

With less than 7,000 ha of pines now remaining, and with 1,000 hectares being cleared each year, the potential loss of some 5,000 Carnaby's Cockatoos over six years is totally unacceptable and must be stopped under the EPBC Act.

Will you please investigate and act on this matter of the continuing clearing of Gngangara pine plantations as a matter of urgency?

Notably the state government has failed to act and still refuses to act on this matter and thus is failing to protect our iconic and endangered species *Calyptorhynchus latirostris*.

The State Forrest Products Commission has harvesting rights to the land for the period that commercial pine is present.

'The original extent of the Gngangara, Pinjar and Yanchep pine plantations was 23,000 ha, planted between 1932 and 1994, and by 1 January 2017 there will be approximately 8,000 to 8,500 ha remaining, at the rate of 1,400 -1,800 ha of clear-felling per year, most of which is scheduled to be harvested by the State prior to 2020'. (p3 Perth and Peel Green Growth Plan for 3.5 million Draft Action Plan E – Pine Harvesting December 2015)

The plantation currently stands at approximately 7,000ha. (p vii The 2017 Great Cocky Count Report)

2017 Great Cocky Count (GCC) Report

On the Perth-Peel Coastal Plain, the majority of Carnaby's Black-Cockatoos are restricted to few roost sites, many of which are associated with pines. Protection of these sites and associated native feeding habitat is crucial to arrest the decline of Carnaby's Black-Cockatoo and ensure its persistence in this region.

Based on an analysis of GCC data, there is strong, consistent evidence that the population of Carnaby's Black-Cockatoo inhabiting the Perth-Peel Coastal Plain is experiencing an ongoing decline. (2017 Great Cocky Count Report Summary of Key Findings)

A total of 7,450 birds was recorded at six sites in the pine plantations. This was 70% of the total count in the Perth-Peel Coastal Plain (p iv 2017 The Great Cocky Count Report) and at least 19% of the total estimated population of 40,000 birds.

Within seven years all this habitat will have been destroyed and this will be a catastrophic removal of critical habitat.

Abundance and distribution of Carnaby's Black-Cockatoo on the Perth-Peel Coastal Plain

The number of birds associated with the Gngangara pine plantation is substantial at a species-scale. A species population of 40,000 birds means that at least 19% of the species occurred within the remaining portions of the Gngangara pine plantation in early April 2017.

'Population of Carnaby's Black-Cockatoo is declining in the Perth-Peel Coastal Plain

Despite the high count this year, there are strong indications that Carnaby's Black-Cockatoo in the Perth-Peel Coastal Plain is experiencing ongoing decline. Trend analysis of roost counts over the last eight GCCs found a current rate of decline of an estimated 11% per year. When restricted to the larger, more stable roosts, the decline was still estimated at 0-5%. From these results, we conclude that the population of Carnaby's Black-Cockatoo on the Perth-Peel Coastal Plain continues to decline at a rate of around 5-11% per annum, slightly lower than trends estimated in previous years (e.g. Byrne et al. 2015; Peck et al. 2016). Should this trend continue, it is of serious concern for the future viability of Carnaby's Black-Cockatoo in the Perth-Peel Coastal Plain'. (p 39 ibid)

'Harvesting without replacement of the remaining pines in the Gngangara plantation will remove a food source that currently supports a substantial portion (at least 19%) of the Carnaby's Black-Cockatoo population between January-April each year'. (p 40 ibid)

The 'Conclusion' of the 2017 Great Cocky Count (p45):

'The 2017 GCC and the trend analyses of the eight GCCs 2010 – 2017 identified several issues that have important implications for black-cockatoo conservation efforts.

Firstly, there are indications that the population of Carnaby's Black-Cockatoo inhabiting the Perth-Peel Coastal Plain continues to decline.

Secondly, as noted in previous GCC reports, the Gngangara pine plantation sustains a large proportion (up to 73%) of the population of Carnaby's Black-Cockatoo on the Perth-Peel Coastal Plain during the non-breeding season. As such, the decline in numbers of roosting Carnaby's Black-Cockatoo will be partly due to the removal of these pine plantations'.

Notably BirdLife reports have consistently been stating that the total Carnaby's Cockatoo population has been in decline.

Carnaby's Cockatoo (*Calyptorhynchus latirostris*) Recovery Plan: WA Wildlife Management Program No 52 Department of Parks and Wildlife, October 2013: The Government of Western Australia and the Australian Government.

This Plan states that Action 1 of the Recovery Actions is:

'Action 1. Protect and Manage Important Habitat

Identify, protect and manage habitat critical for survival (nesting, foraging and roosting) for Carnaby's cockatoos across their breeding and non-breeding range.'

Current pine harvesting contravenes and is thus in breach of this Recovery Action.

The Plan continues under '**2.5 Biology and Ecology**,' stating that:

'In particular, the pine plantations immediately north of Perth have been recognized as an important food resource for Carnaby's cockatoo for over 60 years'(Perry 1948; Saunders 1980; Johnstone et al. 2011). (pp 11,12)

'HABITAT CRITICAL TO SURVIVAL'

Under the heading '*Habitat critical to survival*' in the Recovery Plan, it states that one factor for the long-term survival of a robust population of Carnaby's cockatoos depends on '*foraging habitat capable of providing enough food to sustain the population.*'(p12)

4.2 'Loss of Non-Breeding Foraging and Night Roosting Habitat

'A further significant threat is the clearing, fragmentation and degradation of foraging and night roosting habitat in the non-breeding parts of Carnaby's cockatoo range in the south-west of Western Australia. In particular, the clearing of feeding habitat on the Swan Coastal Plain (e.g. Banksia woodlands and commercial pine plantations which provide a significant food resource (Perry 1948; Saunders 1974, 1980, 1990; Shah 2006; Valentine and Stock 2008; Finn et al. 2009; Johnstone et al. 2011))'. (pp 15,16)

FAILURE TO PROVIDE ALTERNATIVE FOOD SOURCE

The pines have been under staged removal since 2004 with no stated plan to re-establish pines nor to provide an alternative food resource for Carnaby's Cockatoos. Indeed, most of the areas harvested have simply been left and are mostly covered in (non-native) grassland. This has not provided any mitigation or habitat replacement whatsoever. This failure has now reached a critical stage whereby the 7,000 plus Carnaby's Cockatoos risk starvation to death. The context of clearing Banksia Woodland habitat in the region is also a net loss of extent every year.

Wildfires in the state exacerbate the situation. In 2016, fire burnt 69,000ha in and around Waroona, in the State's south west, and it will be at least six years before good habitat is restored.

These threats are collectively catastrophic for the species. The Urban Bushland Council therefore calls on the EPBC Act to provide federal action to stop the loss as a matter of urgency.

Notably the State Agreement Act providing for harvesting for the pines, does not include any provisions for revegetation. This was and is a failure of governance by the State of Western Australia.

The continuing loss of critical habitat for Carnaby's Cockatoos is clearly unacceptable and is in breach of the federally approved Recovery Plan for habitat critical to survival. We seek your urgent action to stop this non-compliance.

Yours sincerely

President, Urban Bushland Council WA Inc.

cc BirdLife Australia WA
WWF

WA Naturalists' Club
WA Gould League

References

1. Carnaby's Cockatoo (*Calyptorhynchus latirostris*) Recovery Plan

WA Wildlife Management Program No 52 Department of Parks and Wildlife Oct 2013
Department of Parks and Wildlife: Australian Government.

2. The 2017 Great Cocky Count Report

Birdlife Western Australia, Department of Biodiversity, Conservation and Attractions.

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