

## **REASONS WHY THE PROPOSAL IS A CONTROLLED ACTION**

*'A 'controlled action' is an action that the minister decides has, will have, or is likely to have, a significant impact on a protected matter'.*

Protected matters in this proposal are the three species of black cockatoo - Carnaby's, Baudin's and Forest Red-tailed Black Cockatoo. Also the Critically Endangered Western Ringtail Possum.

The Urban Bushland Council is of the view that the loss of breeding habitat and the loss of part of a known night roosting site would result in a significant impact on three species of black cockatoo and may have a significant impact on Western Ringtail Possum.

The proponent should refer this proposal to the Minister for Environment.

### **Referral guideline for 3 WA threatened black cockatoo species... Australian Government**

1. 'The loss of breeding habitat is **likely to require a referral**' (p1 Referral document)
2. 'The loss of a known night roosting site is likely to require a referral'. (ibid) (UBC emphasis)

### **Breeding habitat.**

The proposed development site (Site) lies within a '*confirmed black cockatoo breeding site*' intersecting the 12 km boundary around the BUNGLER001 roost site. (Figure 15 Attachment A – Figures)

There is one mapped potential breeding tree - the Tuart tree. However, over the area within the 12 km radius, potential breeding trees must occur as the site is mapped as '*confirmed black cockatoo breeding site*'.

Maps 2, 3 and 4 Appendix C, Referral Guideline, also show the known breeding ranges of Baudins and Carnaby's Cockatoos breeding areas and Map 4 shows, the distribution of Forest Red-tailed Cockatoos.

### **Roosting site/s**

The three species of black cockatoo - Carnaby's, Baudin's and Forest Red-tailed - roost '*adjacent to and within the site*' and forage in the area. (p3 Fauna Survey August 2025)

The Australian Government Referral Guideline of night roosting habitat states that '*Removal of any part of a known night roosting site is likely to require referral to the Minister*' (page 17)

The roost site BUNGLER001 is a known roost site for Carnaby's and for Baudin's cockatoos. (2.0 Basic Fauna and Targeted Cockatoo and WRP Assessment August 2025)

*'The large trees on site are considered part of the BUNGLER001 roost'* (5.3.2 Basic Fauna Survey)

The fact that there are 11 known Carnaby's and/or Baudin's roost sites within 12 km of the proposed development site, and 8 known Red-tail roost sites, is an indication that the area is significant for foraging and roosting for the three species of black cockatoo.

Four of the recorded roost sites are '*within a 5 km radius of the Project Area*' – BUNGLER 002, BUNCOLR001, BUNCOLR002 and DAREATR001. Depending on differing factors, the black cockatoos would roost at the site which best suits them on the day. Factors deciding their

preference would include wind direction, availability of food, direction they would be flying the following morning, threats at one site to be avoided...

A similar situation exists at 'my' site in Floreat, twinned with the Nedlands site. Both are suburbs of Perth. Carnaby's roost between two sites. Both sites are monitored by two individuals and the total from each site's count is considered the total number of Carnaby's existing in the area. Observers are P.F. Berry and Margaret Owen. Margaret Owen may be contacted at [goffmarg@bigpond.net.au](mailto:goffmarg@bigpond.net.au) or 0409 927 810 if further information of roost site sharing has interest. (Margaret Owen)

UBC's understanding of night roosting trees is that Black Cockatoos usually roost in tall non-native trees - usually eucalypts. (pers comm Dr Christine Groom and personal observation- Margaret Owen). So large trees (>8m and 1.02 ha) on the Site are significant. The Project area is therefore considered to comprise 1.02 ha of the total 4.53 ha BUNGLER001 known roosting site.

### **Baudin's Black Cockatoo**

*'Baudin's Cockatoo numbers are in catastrophic decline, being 3,250 or less, they have suffered a 90% decline in roost sites. They should be listed as 'critically endangered'. (Sean Dooley Birdlife Australia. (Conservation Council WA seminar 12 February 2025 'Birds of a Feather - saving the black cockatoo)*  
Every effort should be made to protect Baudin's habitat.

### **Cockatoo Crisis Continues - Black Cockatoo Foraging Habitat**

For the first time in 2023, black cockatoos which have been picked up starving have been sent into the Kaarrakin Conservation Centre and to the Perth Zoo for recovery. There has been a lack of moisture leading to a lack of pollination and thus lack of seeds in Marri trees. In addition, the Kaarakin Conservation Centre received 15 young Black Cockatoos which were too young to be out of their nests because it was too hot. This risk has resulted in a decline in new birds. Key threats are the ongoing loss of native vegetation from clearing, and lack of protection of habitat, as well as climate change. (Glenn Dewhurst: Kaarakin Black Cockatoo Conservation Centre at Conservation Council of WA seminar 'Birds of a Feather - saving the Black Cockatoo' held 12 February 2025)

This crisis was reported by journalist Emma Young of *WAtoday*. *'Perth Zoo and suburban rehab centres were flooded with emaciated birds after Perth's hottest-ever summer and delayed winter rainfall decimated food sources and stopped them breeding'. (WAtoday October 7, 2024)*

Also:

*Lifeline for Perth Zoo vets dealing with starving black cockatoo influx. (WAtoday December 19, 2024)*

### **Western Ringtail Possum**

Two or three WRP were discovered across two nights and one day in a 'previous survey' (2.1.12 *Basic Fauna and Targeted Black Cockatoo Assessment – August 2025*). Therefore, the site provides some habitat for this Critically Endangered species.

The aim of the Recovery Plan for the WRP over the next ten years, is to slow the decline in population size. (p vi)

Page 8 of the WRP's management zones shows (Figure 2) the extent of the zone for WRP from north of Bunbury to Augusta. The text states the *'The extent of fragmentation between remnant patches and continued loss or degradation has important implications on the long-term viability of the populations that depend on them.'* [WRP habitats]

### **Cumulative Impacts and additional information requested**

UBC disagrees with the proponent's claim that "*The potential impacts of the Proposed Action on the species are unlikely to result in a significant impact.*" UBC says this statement is not substantiated due in part because of the lack of information provided by the proponent.

The proposal is missing vital contextual information regarding the cumulative impacts of the loss of habitat in the region upon the black cockatoos and the Western Ringtail Possum.

Further information should be provided on the amount of black cockatoo and possum habitat that has been lost over the past 10 -20 years (or longer) in the region. This information is necessary so that the experts can conduct a proper Environmental Impact Assessment and inform the public and the government about the trajectory of the loss of habitat for these MNES species.

This information is vital so that the Minister for Environment can make the best possible decisions and achieve the best outcomes for nature and the community. This means a net positive outcome where habitat is conserved, enhanced and expanded – particularly for endangered and critically endangered species. Otherwise, our black cockatoos and possums will continue to slide into extinction.

The Samuel Review of the EPBC Act identified that the Act should be amended to support more effective planning that accounts for cumulative impacts, past and future key threats and build environmental resilience. But the Act does not have to be amended to achieve better planning outcomes and to ensure a net positive outcome for nature. The mechanisms are already in place. A thorough EIA considers the cumulative impacts on MNES and does not deal with each project in isolation.

In conclusion, the UBC considers this proposal a controlled action and more information should be provided by the proponent so that the cumulative impacts on the identified MNES can be assessed.

The goal should be to halt and reverse the decline of the population of the black cockatoos and other endangered species and threatened ecological communities in southwest of WA.