



Neerabup Resource Recovery Precinct (Stage 1).

Western Australia

EPBC 2026/10566

Referral open for public comment Until 21/08/2026

The Urban Bushland Council opposes this proposal by the City of Wanneroo.

The UBC submitted comments to the EPA WA requesting that the EPA assess the proposal at the level of a Public Environmental Review, due to its potential significant impacts on threatened species and their habitat - namely Carnaby's Cockatoo (endangered), Forest Red-tailed Black Cockatoo (vulnerable), Quenda (Priority 4) and Western Brush Wallaby (Priority 4). The UBC also had concerns that the proposal is over the Gnangara Groundwater System – significant for drinking water and supporting our wetlands, bushlands and trees.

Controlled Action

The Urban Bushland Council considers that this proposal should be deemed a controlled action

Preamble

- The project area is 47.36 hectares and disturbance is variously cited as 'clearing 10.4 ha' and 'disturbance 9.09 ha' (p 14 Referral document)
- Stage 2 is not included in this referral.

1.) Black cockatoos - Carnaby's and Forest Red-tailed black cockatoos

'The area falls between distribution and breeding range of Carnaby's Cockatoo and Forest Red-tailed Cockatoo'. (Western Environment Basic Fauna and Targeted Black Cockatoo Habitat Assessment.)

UPDATE FROM BIRDLIFE AUSTRALIA ON THE 2026 GREAT COCKY COUNT (email 14 August 2026: Merryn Pryor and the WA Black Cockatoo Conservation Team)

'...many of our count areas, particularly in the PPCP [Perth and Peel Coastal Plain] and NDSP [Northern Darling Scarp and Plateau] have strong consistent survey coverage. The subsequent decline, despite increased survey effort, is extremely worrying as it likely reflects a genuine drop in black-cockatoo populations (Figure 3).'

'...having a consistent body of rigorous evidence, collected over many years, demonstrates a clear pattern that calls for action. Here the link is clear – these charismatic but adaptable birds need this habitat – where we push them too far we will lose them.'

ROOSTING: There are seven mapped and confirmed roost sites within 6kms of the survey area (Western Environment Targeted black cockatoo habitat assessment) so all foraging trees are important

'In the absence of such information most habitat that provides for feeding, regular roosting and potential for breeding is considered important. Identified breeding and nearby feeding habitat, former breeding habitat that has hollows intact and vegetation that provides habitat for feeding, watering and regular night roosting is considered

habitat critical for recovery of the species.’ (p12 and 13 DCCEEW Carnaby’s Cockatoo Recovery Plan 2013)

FORAGING: Two areas are within the precinct - 0.06ha rated as 8/10 and 1.93ha rated at 6/10. DEE scoring tool of 6 is considered high-quality foraging habitat and from 8-10 as very high-foraging habitat over 1 ha. (pers comm A. Kirkby 3 September 2024). These areas, amounting to 1.99ha, are significant foraging areas for black cockatoos.

According to ‘Environmental Assessments Portion 2’, the final score for Carnaby’s Cockatoo is 10 - indicating very high-quality foraging habitat and for Red-tails the final score is 7 - indicating high-quality foraging habitat.

Map on ‘Attachment 1 Figures REDACTED’ (page 6) describes the vegetation of the proposed area as *‘Banksia spp woodland with Euc. tottiana and depauperate E. marginata and a dense shrub layer.’ All these species are important foraging areas.* Tuart trees to the SW corner of the site are an important Carnaby’s food resource for Carnaby’s through the larvae within the Tuart branches.

At 4.5.5 (Ecoscape: Attachment Environmental Assessment – Portion 2.) Habitat contains *‘a diversity of species including proteaceous shrubs and trees, which is foraging habitat for all three Black Cockatoos species.’*

BREEDING: 22 trees with a DCH of > 50cm were recorded in the subsequent study after Ecoscape recorded 3 potential breeding trees and Western Environment recorded 34 potential breeding trees. 16 potential breeding trees are planned for removal and only 6 retained.

GREAT COCKY COUNT 2025

Of the 2025 Great Cocky Count (6 April 2025), the figure of 15,786 White-tailed Black-Cockatoos recorded (with 6,298 individuals recorded on the Swan Coastal Plain), *‘was the lowest recorded total number of white tails since 2015, as well as the lowest recorded count for the Perth-Peel Coastal Plain....since 2015. (Birdlife WA Cocky Notes Issue 38: Spring 2025.)*

‘...the low numbers recorded this year, [2025] particularly for the White-tailed Black-cockatoos, is concerning.’

‘The lower numbers are likely in part a direct measure of real population decline, following both a widely acknowledged poor breeding season (so fewer birds joining the population) and an unknown amount of adult mortality due to starvation, as evidenced by Carnaby’s admitted to Perth Zoo in poor bod condition between July and October.’ (p2 ibid)

This analysis has also been reported by Professor Kris Warren and team, School of Veterinary Medicine, Murdoch University:

‘The lower numbers are likely in part a direct measure of real population decline, following both a widely acknowledged poor breeding season, and an unknown amount of adult mortality due to starvation, as evidenced by Carnaby’s admitted to Perth Zoo in poor body condition between July and October.’

Professor Warren’s Research on Carnaby’s Cockatoo shows *‘a marked decline in population numbers. The result corresponds with the decline in foraging food, water, and roosting*

sources, as well as the increase in urbanisation’. (Long May They Grace Our Skies: Black Cockatoo Research and Conservation. Talk at Naturalists Club 30 September 2025)

‘A key message is that we must not lose any more Carnaby’s habitat, and we must increase habitat trees in urban areas and in the south west region’.

‘Even when Carnaby’s are feeding on pine seeds or canola, they never use only these foods. They need to feed on native vegetation for the protein.

As Carnaby’s Cockatoo Recovery Plan October 2013 states (p36): the Recovery Objective is:

‘To stop further decline in the distribution and abundance of Carnaby’s cockatoo by protecting the birds throughout their life stages and enhancing habitat critical for survival throughout their breeding and non-breeding range, ensuring that the reproductive capacity of the species remains stable or increases’.

2.) **Western Brush Wallaby** (Macropus Irma)

This absolutely beautiful animal’s other common names are Black-gloved Wallaby and Kwara. The Western Brush Wallaby was very common in the early days of settlement. *‘Their range has been seriously reduced and fragmented due to clearing for agriculture and there is a significant decline in abundance within most remaining habitat.’* (DBCA library)

‘Threatening processes

A dramatic increase in the number of foxes in the early 1970s in south-western Australia appears to have led to a decline in the numbers of western brush wallaby. It is thought that juveniles not long out of the pouch may fall prey to this predator. The western brush wallaby is now uncommon throughout its range but its numbers increase in response to fox baiting. It is thought that foxes may take young wallabies and there is also evidence that illegal hunting may affect their abundance in some areas’. (ibid)

The Western Brush Wallaby *‘has experienced an unparalleled rate of extinction.’*

(en.wikipedia.org)

‘Although red fox control measures have helped the population stabilise considerably, due to habitat clearing for farming the population is still fragmented and their range greatly reduced’. (en.wikipedia.org).

I am a Friend of the City of Wanneroo’s Landsdale Bushland and in this fenced bushland there used to be perhaps two Western Brush Wallabies but they died.

This animal only lives in SW Western Australia and its habitat needs protection for it to persist into the future. Protection of Western Swamp Wallaby habitat will enable other plants and animals to persist.

‘Carnaby’s and Forest Red-tailed Black Cockatoos, Quenda and Western Brush Wallaby, based on the desktop assessment, were considered to have a High likelihood of occurring in the survey area’ (p21 Ecoscape Attachment Environmental Assessment – Portion 2.)

3.) **Indirect impact on threatened species** – namely Caladenia huegelii, Calectasia elegans (Elegant Tinsel Lily), Chuditch, Mallee Fowl, Thelymitra variegata (Queen of Sheeba Orchid), Forest Red-tailed Black Cockatoo, Carnaby’s Cockatoo (p28 Referral)

The primary indirect impact on threatened species applicable to this proposal is of habitat fragmentation and the degradation of ecological corridors. Professor Kris Warren has demonstrated that Carnaby’s Cockatoo traverses the landscape over vegetated areas and avoids cleared areas. Light and noise pollution are other factors relating to this proposal.