

4th July 2013

Referral Business Entry Point, EIA Policy Section (EPBC Act)
Approvals and Wildlife Division
Department of the Environment, Water, Heritage and the Arts
GPO Box 787
Canberra ACT 2601

Via email: epbc.referrals@environment.gov.au

Dear Sir/Madam

**Re: Sunshine Coast Regional Council/Natural resources management/Cassia Wildlife Corridor,
Coolum Beach/QLD/Non-lethal dispersal of Flying Foxes in CWC
Reference Number: 2013/6909**

The Sunshine Coast Environment Council is the peak regional environmental advocacy group on the Sunshine Coast, Queensland. Established in 1980 it currently represents 50 community groups working on conservation and sustainability with a combined membership of over 15,000 individuals.

EXECUTIVE SUMMARY

The Sunshine Coast Environment Council (SCEC) is of the strong view that the described action represents significant and unacceptable impacts on the Grey-headed Flying-fox (*Pteropus poliocephalus*) listed as Vulnerable under the *EPBC Act 1999* and submit this action **should not** be approved.

SCEC feels it relevant to note we view the Sunshine Coast Regional Council (SCRC) resolution to undertake non-lethal dispersal as a poor decision based more on politics than science. Indeed, the sound recommendation and well-presented case by officers of the SCRC not to undertake dispersal actions primarily on ecological and financial grounds was disappointingly ignored.

The Officer recommendation presented in the report to the Ordinary Meeting on 23 May this year and supported by SCEC stated in part;¹

(a) receive and note the report titled "Flying-Fox Dispersal Feasibility Study"

(b) not proceed with the flying-fox dispersal in the Cassia Wildlife Corridor, Coolum Beach

(c) not proceed with the flying-fox dispersal in Tepequar Drive, Maroochydore and

(d) note that the reasons for not proceeding with the flying-fox dispersal action at these sites include:

(i) the demonstrated unpredictability associated with the movement of flying-fox colonies following dispersal intervention, and as a consequence;

¹ http://www.sunshinecoast.qld.gov.au/addfiles/documents/agendas/OM_23052013_AGN.pdf page 71



- (ii) the high social risk of transferring the conflict to other neighbourhoods, and as a consequence;*
- (iii) the high financial risk associated with the unknown flow-on costs for follow-up dispersal activities, as well as;*
- (iv) the high initial costs of flying-fox dispersal actions and*
- (v) the dispersal action is not budgeted for in the current financial year.*

(Council subsequently voted controversially to use almost \$250000 of non-aligned Environment Levy funds vital for conservation outcomes for the entire region)

Instead, it appears the lobbying of a small number of constituents (whose discomfort is recognised) overrode fundamental ecological and financial sustainability considerations. The officer report to Council on 23 May identifies

“Over the last eleven months, ten primarily affected residences have submitted complaints, with several residents submitting more than one complaint. This reflects approximately 10.75% of those living in this location, with the majority of complaints received since February 2013. There have been three complaints from individuals from the wider community

While it is understood ‘overriding public interest’ is not necessarily part of the applicable assessment criteria, it is clear that social considerations do not outweigh relevant environmental protections.

SCEC considers the direction to proceed with dispersal actions very likely to be detrimental to the welfare of the Grey-headed Flying-fox (GHFF) and other native species as well as a costly impost on all ratepayers (not just those identifying as being affected).

It also comes on the back of a concerning environmental policy agenda of the Queensland State government whereby crucial environmental protections and long term ecological sustainability are becoming increasingly disregarded. The recent *“A new approach to managing flying-fox roosts” Discussion Paper*² outlines an approach at odds with conservation management for the GHFF, a species recognised for protection under the *Nature Conservation Act 1992* and ranked as a critical priority under the Queensland Department of Environment and Heritage Protection Back on Track species prioritisation framework³. Compounding actions arising from state, and now, local government activities threatens the viability and recovery of this ecologically important species making Federal environmental protection crucial.

ECOLOGICAL AND GEOGRAPHICAL CONTEXT

The Sunshine Coast is recognised as a biodiversity hotspot and a region experiencing high levels of population growth⁴. Notably, it is the ecologically important coastal lowlands where much of the urbanisation has occurred. Continued clearing and modification of these complex systems is

² <http://www.ehp.qld.gov.au/wildlife/livingwithflyingfoxes/roost-management.html>

³ http://www.ehp.qld.gov.au/wildlife/animals-az/greyheaded_flyingfox.html

⁴ [Sunshine Coast Biodiversity Strategy pg 6](#)



exacerbating biodiversity decline and threats to native wildlife. Seventy percent of the *M. quinquenervia* swamps between Noosa Heads and Tweed Heads (Coolum Beach lies in-between) have been lost to urban development (Hall unpublished). The complexity of the habitat requirements of *P. poliocephalus*, particularly its requirement for multiple, geographically dispersed populations of food trees leaves the species vulnerable to population declines from land use decisions and management strategies in unreserved forests of various tenures (Parry-Jones 1993, Pressey 1994, Eby 1996, Tidemann and Vardon 1997).

UNACCEPTABLE IMPACTS

SCEC asserts that impacts to the Grey-headed flying-fox population from dispersal activity represents a threatening process and must be avoided

The potential direct and indirect impacts as described in the referral are;⁵

- Injury
- Disorientation
- Fatigue/Exhaustion
- Malnutrition
- Fragmentation of colony
- Cumulative sleep debt
- Disruption to breeding cycle
- Damage to hearing
- Abortion of young
- Dropping of young/abandonment of young
- Disruption of breeding cycle at alternative roost sites
- Overcrowding at alternative roost sites
- Increased stress / dehydration at alternative roost sites
- Increased pressure on food resources nearby to alternative roost sites

Critical breeding times for flying-foxes should also preclude dispersal activity of any description being attempted. Being;

1. Final Trimester of pregnancy (high risk of abortion) August / September for Black and Grey-headed Flying-foxes
2. Birthing: September/October/November
3. Dependant and independent creching young January – March/April
4. Conception: April/May (noting that Flying-foxes will mate from January–May, with male Black and Grey-headed Flying-foxes only fertile for two months of this)

SCEC would add emphasis to the reference that negative public attitudes and conflict with humans (and subsequent dispersal activities) has been identified as a Medium Priority Threat in the Draft National Recovery Plan for the Grey-headed Flying-fox. As such the dispersal of a significant population of GHFF could be considered a threatening process⁶.

5 EPBC 2013/6909 3.1 (d)

6 EPBC 2013/6909-Significant Impacts Criteria pg 15



It is evident that any initial and potentially ongoing dispersal actions represent a significant threatening process to a species experiencing compounding impacts and alarming rates of decline.

LOCAL IMPORTANCE

The Cassia Wildlife Corridor has been used by the Grey-headed Flying-fox for at least one breeding season (2012/2013) and as such, the location is determined to be habitat critical for survival of the species. At peak of size, the roost static count was 6500, with an estimated 80% composition of GHFF (approximately 5200 individuals). There is no data to confirm if flying-foxes used the site to rear young. However, records indicate that the site was occupied during the months that maternity camps are generally occupied.⁷

SCEC reiterates that this corridor forms part of an important landscape mosaic utilised by the GHFF and other flying-foxes and should be allowed to continue its functionality as a viable camp.

CONCLUSION

While mitigation measures identified by the SCRC in the referral document are acknowledged, they may not be sufficient to lessen the magnitude of impact to acceptable levels, particularly over time. There remains an absence of any study which shows the long term impacts of dispersal activities and disturbance on breeding success of dispersed animals. Long term impacts from overcrowded roost sites adjacent and the viability of other roosts being compromised are real risks. Only a study of this type would begin to indicate if dispersal as a management practice for Flying-foxes is sustainable.

Given the inherently supportive characteristics of the CWC roost for the GHFF, dispersal from this ecologically and socially strategic camp **should not** be undertaken. Flying-foxes are unparalleled in their critical role as pollinators and seed dispersers. Considering that all populations of the flying-fox are currently in decline and need to be stabilised, it would seem especially prudent not to undertake dispersal actions. Such actions, while intended to be non-lethal, could well prove otherwise and push the Grey-headed Flying-fox closer to a more dire conservation status.

The opportunity to provide comment is appreciated. Please contact me should further information or clarification be required.

Yours sincerely

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Other references:

<http://www.environment.gov.au/biodiversity/threatened/publications/action/bats/13.htm>
accessed 04 July 2013

<http://www.environment.gov.au/epbc/publications/pubs/grey-headed-flying-fox.pdf> accessed 04
July 2013

