



Ku-ring-gai Bat Conservation Society Inc.

Post Office Box 607, Gordon NSW 2072 Australia

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Submission on NSW Biodiversity Legislation Review

Ku-ring-gai Bat Conservation Society Inc. (KBCS) is a community organisation which promotes conservation of bats, particularly flying-foxes and has been involved with management of Ku-ring-gai Flying-fox Reserve in the northern Sydney suburb of Gordon, since 1985.

KBCS supports the retention of the principles of ecologically sustainable development as the foundation for all legislation in NSW. Without a healthy, functioning environment society and its economy cannot be sustainable.

Conservation Action

Strong community and local government support led to a Conservation Agreement over Ku-ring-gai Flying-fox Reserve, Gordon. This agreement has been highly beneficial. The security of the Conservation Agreement has enabled KBCS to obtain a series of grants for habitat restoration and its members have contributed financially as well. The Conservation Agreement has ensured that Ku-ring-gai Council invests in the reserve's conservation and in 2013 updated the Management Plan for the reserve.

KBCS strongly supports retaining covenants which legally protect biodiversity. It would also support incentive-based conservation agreements for roosting habitat or for high quality flying-fox foraging on private land. Although landowners should have a duty of care to retain their land in a biologically healthy state, where there is a clear biodiversity benefit beyond their land, incentive payments to assist them would be beneficial to them and the wider community.

Conservation in land-use planning

Research has been undertaken to rank the feeding habitats of grey-headed flying foxes for conservation management (Eby & Law 2008). Although this research is publicly available on the website of the Office of Environment and Heritage, it appears that it is not effectively considered in land-use planning. Loss of spotted gum forest in the Newcastle region is continuing as development fragments this periodically rich source of nectar.

Private Native Forestry allows removal of timber for profit with little oversight. The ecosystem services provided by mature eucalypts on private land are not considered. It is very likely that the shift of flying-foxes into urban areas is partly caused by the loss of foraging habitat on private land, due to the uncontrolled harvesting of their diet species across large rural areas.

The shift of flying-foxes to urban areas can only be managed on a whole-of-landscape level. Solutions would include removal of exotic species(eg. palms, privets, celtis) which provide additional diet species in urban areas and replacement with native foraging habitat in rural areas. Cumulative impacts must be calculated and limits put in place. If all the mines, logging in State Forests and on private land and clearing for agriculture and urban development were accounted for in terms of the foraging habitat of the suite of nectar-feeding migratory fauna, then it would become

clear why species are in decline. All land-uses which cause loss of habitat must be treated equally. In the end, offsets will become impossible because there is no suitable habitat left.

Information provision

Attitudes to flying-foxes have polarised in recent years. People who know their biology and ecology appreciate them. People whose knowledge is limited to media reports on the latest virus outbreak have very negative attitudes. Despite clear information on www.environment.nsw.gov.au, lobbying by people afraid of flying-foxes is taking up huge amounts of time for state and local government. NSW Health provides sensible information on the risk of disease from flying-foxes which is in fact extremely low and manageable.

Nomadic species such as flying-foxes need over-arching monitoring and conservation action across their range. Cumulative impacts need to be assessed and monitored throughout their range as well as regionally.

Retain independent Threatened Species Scientific Committee

Retain assessment of threats to biodiversity and assessment of threatened status of species and ecological communities by an independent committee of scientists which bases its advice on scientific research .

Flying-foxes and other nomadic fauna (Swift Parrot, Regent Honeyeater, other honeyeaters), depend on foraging habitat which varies in time and space. Australian flora is adapted to highly variable climates which switch from droughts to flooding rains and a suite of fauna species depends on flowering pulses which vary in time and space. Radio and satellite tracking of individual grey-headed flying-foxes has identified movements of many hundreds of kilometres. Tracking research has highlighted the dependence on foraging habitat, especially many Myrtaceae species. Population estimates of flying-foxes at their camps have shown there are substantial latitudinal shifts in their population.

Ku-ring-gai Bat Conservation Society provides these examples to illustrate aspects of where NSW legislation works for a threatened species such as the grey-headed flying-fox but does not ensure their future or the future of the ecosystems with which they interact. One of the biggest problems is that the legislation is not effectively implemented. Below we list several documents related to the matters raised.

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Nelson, J. and Lumsden, L. (2007). Satellite-tracking Grey-headed Flying-foxes. A final report to the Department of the Environment and Water Resources. Arthur Rylah Institute for Environmental Research, Department of Sustainability and Environment, Heidelberg, Victoria.

Eby P and Law B (2008). Ranking the feeding habitats of Grey-headed flying foxes for conservation management A report for The Department of Environment and Climate Change (NSW) & The Department of Environment, Water, Heritage and the Arts

National Count of Grey-headed Flying-foxes April 3 & 4, 2004

A report by Dr. Peggy Eby to: Dept. Environment and Heritage, Queensland Parks and Wildlife Service, NSW Dept. Environment and Conservation, Victoria Dept. Sustainability and Environment

Eby, P., Collins, L., Richards, G. and Parry-Jones, K. 1999. The distribution, abundance and vulnerability to population reduction of a nomadic nectarivore, *Pteropus poliocephalus* during a period of resource concentration. *Australian Zoologist* **31**: 240-253.