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Proposed delisting of the Superb Parrot (*Polytelis swainsoni*) under the EPBC Act

The Canberra Ornithologists Group wishes to make comments in relation to the eligibility of the Superb Parrot for continued inclusion as a threatened species under the Environment Protection and Biodiversity Conservation (EPBC) Act.

The Canberra Ornithologists Group (COG) is a volunteer-based community group with around 300 members whose mission includes the conservation of native birds and their habitats. COG plays an active role in advocating for the protection of native vegetation/bird habitats and for the mitigation of threats to and impacts on native birds.

After the publication of *The Action Plan for Australian Birds 2010* (Garnett et al, 2011) produced by Birds Australia (now Birdlife Australia), the Canberra Ornithologists Group provided comments on the recommendation to delisting the Superb Parrot on the IUCN Red List Status of Extinct, Threatened and Near Threatened Australian bird taxa. Our comments were subsequently published and formed part of an article in June 2012 titled 'A Superb Outcome?' (Australian Birdlife Vol. 1 No.2, pp34-37) in which we outlined our concerns about the recommended delisting. We wrote, in part, due to our concerns that the delisting from 'Threatened' to 'Least Concern' would lead to a reduction in status by Commonwealth, State and Territory authorities. **The proposed delisting has confirmed our concerns.**

COG does not agree with the conclusion in *The Action Plan for Australian Birds 2010* relating to the status of the Superb Parrot. COG has undertaken surveys of the Superb Parrot in the ACT at particular sites for a substantial period of time and has published several reports, so we feel we are in a position to provide an informed view generally in relation to the occurrence of the Superb Parrot in the ACT area.

- The basis of our concern is that the recommendation of the Birds Australia Research and Conservation Committee (BARCC) was not based on any new information, but rather based

on a change of the rules governing nomination. This does not warrant a delisting unless there is supporting evidence to indicate a change in abundance or rate of survival.

- The BARCC decision was not based on any rigorous survey data but on the Delphi technique in which a group of experts arrive at a consensus on the perceived status of a species. To our knowledge, none of the individuals on BARCC had personally been involved in any research on the Superb Parrot.
- The Consultation Document makes a point about the increase in numbers of the parrots in the ACT since 2005, apparently with the underlying assumption by some that this reflects an actual increase in abundance. To date there are no published data to indicate an increase in abundance or survival rate; in fact quite the opposite, see Ellis and Taylor (2014) who indicate that the Superb Parrot has not increased over the 2010-13 period since the 2005-09 drought.
 - Some bird species have increased in number in the ACT, for instance Pied Currawong, Eastern Koel, Australian King-Parrot. In those cases the increase appears to be a change in distribution rather than an increase in abundance.
 - The fact that the distribution of Superb Parrots appears to have changed could be related to climate related factors or factors occurring outside the ACT such as displacement from other areas or where habitat has been lost; the Canberra area is on the edge of the species' woodlands range.
- The Superb Parrot is an uncommon species in the ACT. In three reports analysing the Canberra Ornithologists Group's Woodland Bird Monitoring Program data, Superb Parrot occurrence was too low to determine a long-term trend pattern (Cunningham and Rowell, 2006; Bounds, Taws and Cunningham, 2007; Taws, Bounds, Rowell and Cunningham, 2011). Any changes in Superb Parrot abundance in the ACT cannot be used to infer changes in the whole Superb Parrot population.
- It seems surprising to COG that a recommended two-tier reduction to the IUCN listing from 'Vulnerable' to 'Least Concern' in the Action Plan for Australian Birds, which has led to the present recommendation to remove the species from listing in the EPBC Act, should be based on such a short entry (less than 50 words) in the Action Plan (see Appendix 2, p429). **This level of evidence is not an acceptable basis for a delisting.** In the main, the recommendation is based on 'New Knowledge' which we understand is rejected by those experienced with the study that acquired the information (Manning et al., 2006) and on the lack of correlation between hollow availability and parrot abundance, (Davey and Purchase, 2004) which we believe has also been rejected by the authors of the study and does not support the assertion that hollows are limiting.
- To our knowledge there has been no rigorous research to determine that nesting hollows are a limiting resource for the breeding of the Superb Parrot. However, it is well recognised (Gibbons and Lindenmayer, 2002) that tree hollows in general are a scarce resource and becoming more so.



- One of the best ways to protect this limited resource on fertile agricultural land has been the 'Vulnerable' status of the Superb Parrot in Commonwealth, State and Territory legislation. To delist the species or remove its listing from the EPBC Act will greatly reduce our ability to protect the diminishing nesting resource not only for the Superb Parrot, but also for the many other hollow nesting species, especially on land in private hands.
- As an example, recently within the ACT a known nesting site of *Eucalyptus rossi*/*E. blakelyi*/*E. melliodora* was excluded from the development of the suburb of Throsby. Due in no small part to the EPBC Act and the listing of the Superb Parrot, this area has now been saved from development.
- In relation to the two known breeding locations of Superb Parrots in the ACT (Throsby Ridge in northern Gungahlin and the Central Molonglo on the western side of Canberra), both areas abut the urban edge of Canberra and are by no means secure as ongoing nesting areas.
 - Throsby Ridge will, in the couple of years, have a new suburb within 100 metres from the nest trees, and although the nest trees will be in a reserve, there are likely to be increased nest hole competitors, including the introduced Common Myna drawn in by the urbanisation, and indirect impacts of close urban settlement. There is a requirement under the Gungahlin Strategic Assessment Biodiversity Plan (June 2013) for offsets monies for a research program on the parrots nesting on Throsby Ridge, however, that has not yet been put in place or commenced. We do not know if the parrots will successfully breed and endure at that site.
 - The Central Molonglo is currently rural, leasehold land which the ACT Government has agreed not to develop, however, there remains much pressure for more developable land for housing in the ACT, and that area has no formal (legal) protection.
 - It is of note that the breeding areas preferred by the parrots have scattered mature trees with a grassy (grazed) understorey; this suitable habitat is scarce in the ACT, and although there are large woodland areas in ACT reserves, they are not preferred as nesting habitat by the parrots.

Conclusion

COG appreciates that where adequate data on abundance or survival rates are available, species can be removed or downgraded from listings such as in the EPBC Act, **but in the case of the Superb Parrot such information does not exist.** The Superb Parrot is a umbrella species for the protection of isolated paddock trees in private hands in the agricultural matrix and the removal of the species from the 'Vulnerable' listing, will greatly reduce the ability to protect this diminishing nesting resource in the ACT and in NSW for this and other species. **In the future, potential loss of mature eucalypts across the landscape is a highly significant issue which has not been given adequate weight in considering the long-term survival prospects for the Superb Parrot.**

Removal of the Superb Parrot from the list of threatened species will impact on conservation management programs for the species, in particular the protection of tree hollows. If removed it is most likely that nesting resources will decline through increased clearing, impacting further on the

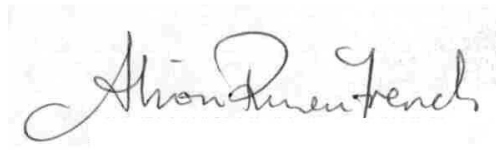


decline of the species **and leading to the Superb Parrot becoming eligible for relisting in the foreseeable future.**

Given the lack of science-based information to support delisting, COG is of the view that delisting of the Superb Parrot would be inimical to the future long-term prospects of the bird. Further, the Precautionary Principle should apply, consideration of delisting should only occur once adequate information is available to demonstrate a sustained increase in population numbers or an increase in survival rate. The minor entry in the Action Plan does not meet the necessary standards to support delisting.

COG notes the Consultation Document indicates (p7) that the Commonwealth's national recovery plan for the Superb Parrot is due for review in 2016 and that 'it is unknown what impact the recovery plan is having on the survival of the superb parrot'. This is further reason for not considering any downgrading until a comprehensive review is undertaken, including reference to survey data and field-based studies on the Superb Parrot.

Yours sincerely



Alison Russell-French

President

19 December 2014

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