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Comments on initial draft national recovery plan for the South-eastern Glossy Black-cockatoo (*Calyptorhynchus lathami*).

The Canberra Ornithologists Group (COG) wishes to provide comments on the initial draft national recovery plan for the South-eastern Glossy Black-cockatoo (*Calyptorhynchus lathami lathami*), as circulated on 22 November 2022.

COG is a volunteer-based community group with around 350 members, with a mission that includes the conservation of native birds and their habitats in Canberra and the surrounding region. COG plays an active role in advocating for protection of native vegetation, and for the mitigation of threats to and impacts on native birds. COG undertakes surveys of birds, including long-term monitoring projects that can usefully inform land use and land management actions, and has undertaken comprehensive bird surveys in ACT woodlands over several decades.

Overall, COG welcomes progress with the national recovery plan for the South-eastern Glossy Black-cockatoo, following listing of this sub-species as Vulnerable under the EPBC Act on 10 August 2022. COG recognises that this national recovery plan is an overarching document, with greater emphasis on strategic planning than specific conservation management actions.

COG supports the focus of the draft plan on habitat conservation and restoration, and diminution of threats from inappropriate fire regimes. This focus is reflected in Action 1b) of the draft plan:

*Restore existing and future Glossy Black-cockatoo habitat in strategic locations close to, and within key sites and known movement corridors.

However, the draft plan does not distinguish the different needs for *restoration of foraging habitat* and for *restoration of nesting habitat*. This is especially important for a species such as the Glossy Black-cockatoo which (as for another endangered species, the Swift Parrot) has different and specialised foraging and nesting habitat requirements.

Moreover, the draft plan omits any acknowledgement of the range of approaches to habitat restoration. The draft plan should clearly state that habitat restoration can involve any or all of the following:

- promoting natural regeneration of habitat
- restoration planting in low-quality habitat patches, and
- active creation by planting of new habitat patches.

Each of these activities can increase connectivity as well as increasing habitat quality, and the last activity also increases habitat extent.

This latter omission is reflected in the draft plan containing no mention of conservation actions currently underway, and not attempting to integrate these into the actions it proposes. The draft plan does contain a section on current threats, but curiously contains no corresponding section on current conservation actions. This lack of recognition of current conservation actions risks disenfranchising community groups on whom so much conservation work depends, and could undermine the role of Strategy 6 on stakeholder participation.

Specifically, the major conservation action that has been undertaken by numerous community groups – and is ongoing – is the planting of stands of casuarinas as a foraging resource. However, the actions or their performance criteria in the draft plan are not written or framed in a way that support this work. The relevant action would likely be Action 1b, but only one of its performance criteria is even marginally relevant, namely "Connectivity between, and quality of habitat patches have improved with appropriate tree species" – and this performance criteria might not be interpreted as referring to restoration planting.

If there is some doubt on the value of restoration planting, then this can be covered in an additional action under Strategy 5 for increasing knowledge of the species to inform recovery planning.

In summary, COG suggests that the draft national recovery plan be amended to note:

- the different types of habitat that need protection and restoration (foraging habitat and nesting habitat)
- the different types of restoration approaches that can be used (natural regeneration, restoration planting, and planting new habitat patches), and
- the existing programs for planting casuarinas as feed trees for Glossy Black-cockatoo.

These conservation strategies and actions would best be developed and encouraged on a regional basis, including both strategic habitat restoration and planting at significant sites, as well as establishing additional significant feeding sites in key areas.

COG would be grateful for the opportunity to comment more fully during the statutory 3-month public consultation period, when this occurs. COG can be contacted on cogoffice@canberrabirds.org.au.

Yours sincerely

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