

## **Inquiry into flying-fox management in the eastern states**

Submission by email, November 17<sup>th</sup>, 2016

The Minister has not allowed much time but I would like to provide brief comment on some of the ToR for this inquiry. I will use the abbreviations FF for flying-foxes, and SFF for Spectacled flying-foxes.

*\* - the circumstances and process by which flying-foxes are listed and delisted as threatened species at both the state and Commonwealth levels;*

I understand that there are standard guidelines which are used to determine the status of any species and these should be applied evenly across the board for any species – although I would act in the species benefit when it comes to pollinators in particular. I don't really understand what the intent of this term is or why it is included, unless the govt is looking to reduce the standards for protection when it comes to FF and treat them differently to other species - and I wouldn't agree with that.

*\* the interaction between the state and Commonwealth regulatory frameworks;*

Well, there is a state level of govt and unless the Commonwealth plans to remove the state level, then states have the right to make their own legislation for all subject areas including the environment. However, when it comes to a species status, species might be better served by a singular classification which is nationally applied.

*\* opportunities to streamline the regulation of flying-fox management;*

Should I suspect that the Commonwealth has grown tired of hearing it from both sides of the argument – one segment screaming that the “flying cane toads” should be wiped out and the other side demanding that the govt “uphold the terms of protection”? I still believe that you as a regulator would have an easier job of it if you supported the funding for proper toxicological research into how chemicals are impacting FF biology and leading to increasingly urbanised roosting habits. As it is now, the public blames the bats for something they are not guilty of and tries to push govt's buttons to get rid of them while the conservation community demands better protections and ENFORCEMENT for when the laws are ignored. You can diffuse a lot of the steam in this pressure cooker once the chemical impacts are identified and communicated to the public.

I understand that local councils are getting squeezed by red tape when it comes to approvals from state and commonwealth levels of govt for FF removals but, when it comes to the SFF, a species which deserves and has been nominated for Endangered status, those approvals are necessary. We have already witnessed plenty of incidences in Cairns where parties (including local govt) have thumbed their nose at permits and done what they like which is of detriment to the declining SFF. For the time being, I don't believe that regulations for FF management should be

reduced. To the contrary, what you consider the definition of "cumulative impact" is flawed and needs redefinition. There has been cumulative damage to the nationally significant nursery colony of the SFF in the Cairns CBD but it was allowed by your dept because the roosting tree removals were more than a few weeks apart. That is not an acceptable definition and it allows environmental damage that should not have occurred.

As for state govt, I believe that the knowledge of SFF by certain staff who hold decision making positions is deficient when it comes to FF biology and needs to be addressed but that is not your jurisdiction unless you plan to override the states in this matter.

*\* the success or otherwise of management actions, such as dispersal of problematic flying-fox camps.*

I'm sure there will be other submissions to confirm that dispersals don't work. The approval of FF dispersals shows a distinct lack of knowledge about the animals you want to disperse and the stress of dispersals exacerbates other threats already involved in their decline. And to mention it again – you would understand and could address the problem of increased urbanisation if you verified the chemical role in driving FF into human-occupied areas. Once you know that, you can remove that driver by banning aerial spraying (which should be banned anyway for human health considerations).

I will leave it to others to comment on the details of dispersals but Cairns council tried it and it certainly didn't work. Council has been forced to do an about-face regarding how they handle FF matters – they haven't done a complete 180 deg but they certainly won't attempt a dispersal from the library again.

Thank you for reading my comments. I believe the insufficient time allowed for this inquiry will prevent many experienced people from commenting – especially up here where it is the middle of SFF birthing season.

Sincerely,

Deborah Pergolotti

winner: Centenary Medal, Cassowary Award