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Jeanette Muirhead  
Director - Species Listing Section  
Wildlife Branch  
Department of Sustainability, Environment, Water, Population and Communities  
PO Box 787  
Canberra ACT 2601

Re: Key Threatening Process "Aggressive exclusion of birds from potential woodland and forest habitat by over-abundant Noisy Miners *Manorina melanocephala*"

Dear Ms Muirhead,

The South East Queensland Fire and Biodiversity Consortium (SEQFBC), established in 1998, is a network of stakeholders devoted to providing best-practice recommendations for fire management, fire ecology and the conservation of biodiversity in the South East Queensland (SEQ) region through education, community engagement and applied research. The SEQFBC is now in its fourteenth year and is being hosted by SEQ Catchments, the regional natural resource management (NRM) body for the SEQ region. This newest phase of the SEQFBC is generously supported by Brisbane City, Gold Coast City, Ipswich City, Lockyer Valley Regional, Logan City, Moreton Bay Regional, Redland City, Scenic Rim Regional, Somerset Regional, Sunshine Coast Regional and Toowoomba Regional councils, Powerlink, the Queensland Fire and Rescue Service, the Department of National Parks, Recreation, Sports and Racing, the Department of Transport and Main Roads and SEQ Catchments.

The SEQFBC Steering Committee cautiously support the recognition of overly abundant Noisy Miner (*Manorina melanocephala*) populations that exclude other native birds from woodland and forest habitat, as a Key Threatening Process (KTP) under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). However, the SEQFBC also have significant concerns regarding:

- the consequences of such a listing with respect to operational fire management practices and Endangered native grassland communities;
- a KTP listing that is focussed upon a problem that is a result of broad landscape management and does not, as such, deal with the real conservation issues; and
- the need for specific trial culling target areas to be included in the Threat Abatement Plan to ensure non-target native species are not impacted by the listing.

Not being directly involved with Noisy Miner management or ecology, the SEQFBC have chosen to submit this letter in response to the nomination, rather than complete the suggested questions. I have been in contact with Dr Ivan Lawler, who confirmed that a letter would be acceptable.

**The SEQFBC is proudly sponsored by:** Brisbane City Council, Gold Coast City Council, Ipswich City Council, Lockyer Valley Regional Council, Logan City Council, Moreton Bay Regional Council, Redland City Council, Scenic Rim Regional Council, Somerset Regional Council, Sunshine Coast Regional Council, Toowoomba Regional Council, Powerlink, Queensland Fire & Rescue Service, SEQ Catchments, the Department of National Parks, Recreation, Sports and Racing and the Department of Transport and Main Roads.

### *Fire Management*

Section 10.4, "*Fire regimes which encourage structural complexity*" describes how too hot or too frequent fire may result in habitat structure and complexity "*suitable for Noisy Miners*". It goes on to suggest that reduced fire frequency or intensity may decrease the suitability of such habitats. The SEQFBC have serious concerns with the current wording of this section. Importantly, the two native grassland communities in Table 1 (White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland and Grey Box Grassy Woodlands and Derived Native Grasslands of South-eastern Australia) are listed as Critically Endangered and Endangered under the EPBC Act. Preservation of these grasslands is associated with frequent fire in high soil moisture conditions. Any KTP listing suggesting deliberate changes to current fire regimes to alter open grasslands to shrubby forest, to reduce Noisy Miners, would be in direct opposition to current management recommendations to protect these Endangered communities and is not encouraged or endorsed by the SEQFBC. Moreover, often open eucalypt woodland and forest with a native grassy understorey are threatened due to inadequate burning, which results in the development of dense understorey species such as cypress and casuarina. Such understorey changes often exclude other native plants and result in reduced floristic diversity. Rather, a recommendation to review current fire regimes for any target areas included in the TAP would be more appropriate and ensure one conservation value (i.e. native open grasslands) is not sacrificed for another conservation value (i.e. reducing Noisy Miner populations).

### *Noisy Miner Culling*

Section 10.1, "*Direct Culls*" suggests the use of direct culling to control Noisy Miner populations and of the list of six threat abatement measures in Section 10, culling would likely be the most effective and cost/resource efficient measure. The SEQFBC recognises that woodland birds are under significant threat in Australia due to many issues, including habitat loss and modification (e.g. grazing) and that direct culling may indeed be the most efficient way of reducing Noisy Miner numbers and allowing other native woodland bird populations to increase. Although, it does appear that this is treating a symptom of current land management practices, rather than the real issue and of course, there is always concern regarding the culling of native species. However, the SEQFBC also recognises that many native woodland birds are disappearing faster than changes to policy and legislation that might better conserve them can occur. Therefore, the SEQFBC cautiously supports the proposal to trial direct culling of Noisy Miners, provided it is managed under strict guidelines and with the use of trial areas (as suggested below).

### *Threat Abatement Plan*

Section 12 includes information on "*what elements could a threat abatement plan include?*" The SEQFBC are concerned that there is no mention of the identification of trial areas for culling (or other threat abatement measures) in this section. BirdLife Australia would very likely have adequate information that would allow for the nomination of trial areas across the country and provide the opportunity to test the efficiency and effectiveness of direct culling, ethics approval processes and also to ensure other native, non target species are not the unintended victims of overly enthusiastic participants. Whilst the SEQFBC recognises the success of direct culling in Victoria, trial locations in other parts of Australia would appear a sensible approach to a controversial threat abatement measure.

The SEQFBC hope that this submission has been of assistance to the assessment of this nomination and would be happy to be of further assistance if required.

Yours sincerely,



Dr Samantha Lloyd  
Manager

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