



**Attention EPBC referrals team**

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19 August 2014

**Title of Referral: BRCP Oasis Land Pty Ltd/Natural resources management/Cairns/QLD/Tree removal including roost trees for Spectacled Flying Fox**

**Reference Number: 2014/7296**

The Cairns and Far North Environment Centre (CAFNEC) is the peak regional non-government environment organisation for Far North Queensland. CAFNEC was established in 1981 by concerned local and regional community members with an interest in nature conservation and environmental protection. We engage with stakeholders across community and industry to enhance conservation and protection outcomes, and to promote issues of sustainability. Our work relates to advocacy and awareness-raising, whilst collaborating with other organisations focusing on issues of local, state, national, and international importance.

CAFNEC provides the following as comment with relation to the proposed removal of trees that include spectacled flying fox roost trees (ref: 2014/7296).

**The proposed removal of trees must be deemed a controlled action**

The proposed action involves the removal of approximately 11 trees including several that provide the roost and breeding site (together with the adjacent Cairns City Library site), for a long established spectacled flying fox (SFF) colony.

Several claims in the referral document that the proposed action will have an insignificant impact are incorrect, contradictory and/or misleading, as outlined in the following points.

- It is stated that SFF have recently only been identified in two trees, but at the same time noted that *“spats and noise from SFF that have used some of the mango trees as a roost”*, was part of a management problem. The trees to be cleared are predominantly mango trees and first hand observation and photos have shown SFF roosting in several of these during this year.

- The claim that trimming of trees in May this year, by the Cairns Regional Council (CRC) at this site and the adjacent library site (as an attempt to disperse the colony) was deemed successful, is incorrect. Photographs taken following this action clearly show large numbers of individuals in trimmed trees at both sites (refer below photos). It is understood CRC are seeking to take further action to disperse the colony.



Abbott Street, Novotel May 2014 (post trimming)



Aplin Street, Library May 2014 (post trimming)

- The statements that there will be no significant impact to the SFF colony because they are currently present in low numbers and/or have moved on are misleading at the least. A CSIRO research project currently underway, has found considerable seasonal fluctuations in the number of animals utilising particular roost sites, with a large decrease in winter (current season).
- The claim in the referral that there will be no impacts to Matters of National Environmental Significance 3.1 (a) World Heritage Properties (Wet Tropics World Heritage Area), is in contradiction with the following statement - *"In May 2002, the species was classed as Vulnerable under the Environmental Protection and Biodiversity Conservation Act 1999 due to threats such as habitat loss and persecution, as well on the basis of detrimental impact upon the Wet Tropics world heritage landscape if the species were to be further reduced, or lost entirely."* (CSIRO web site – SFF ecology research project).

Removal of the trees on this site should be deemed a controlled action as it is likely to have a significant impact on SFF and the region for the following reasons.

- The largest camps in the Wet Tropics typically have no more than 25,000 to 40,000 SFF individuals. The estimated number of SFF occupying this combined site has ranged from just a few thousand in some months to 10,000 individuals (CSIRO, 2013) or even 15,000 (CRC fact sheet). These estimates alone demonstrate that this is a significant SFF roost and breeding colony, which has been established at this location for over 30 years. It is also one of only two 'permanent' camps in the Wet Tropics, with year-round occupation apart from occasional periods of a few days or a few weeks (CAFNEC 2013).

- Flying foxes including SFF are the main pollinators of many native Australian trees and are “*vital to the continued survival of many rainforest trees*” (Dr Martin Cohen, CRC fact sheet) and any reduction in habitat/roost sites will therefore have a direct impact on the Wet Tropics World Heritage Area.
- The species is listed as Vulnerable under the *Environment Protection and Biodiversity Conservation Act 1999*. The fact that “*flying fox numbers have significantly decreased over the past 50 years*” and the SFF is listed as vulnerable (CRC fact sheet), means that any negative impact on existing colonies should not be considered.

Thank you for the opportunity to comment and please feel free to contact me if you require clarification or further information.

Sincerely



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