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12 December 2019

Mr Christopher Manchon  
Wildlife Management  
Dept of Environment and Science  
GPO Box 2454  
Brisbane, QLD, 4001

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Dear Mr Manchon,

**Re: Flying Fox roost management codes of practice and management guideline**

Thank you for the opportunity comment to on the draft documents for the review of urban Flying Fox management. NQCC supports the valuable feedback provided by other conservation organisations on this review. In this submission, we would like to emphasise a few important points relating to Flying Fox roost management in Queensland. Within NQCC's range there are numerous Flying Fox roosts in Townsville, Ingham, Mount Isa and Charters Towers so this matter is of great concern to us. We ask that you give careful consideration to preventing further population losses of Flying Foxes so that we can avoid losing our wildlife to extinctions.

**Who we are**

North Queensland Conservation Council (NQCC) is a peak organisation for the region and is part of a network of statewide conservation councils. Established in 1974, NQCC is a not-for-profit incorporated association with a broad mandate to protect the "land, waters and atmosphere of the region" and since then has worked on a number of environmental issues of significance to North Queensland and beyond. NQCC covers an area along the coast from Bowen in the South, North to Cardwell and inland to Mt Isa, through to the Northern Territory border. We are the voice for the environment and represent over 1500 members and supporters.

**About Flying Fox Management**

NQCC would support the restoration of the management of wildlife to be in the hands of the Queensland Government rather than local authorities. This is especially important now as Flying Foxes are facing more stresses than ever with all four species in decline, two species already categorised as threatened, with the now endangered *Pteropus conspicillatus* suffering dramatic decline in population. Especially under

these circumstances, it is best that Flying Foxes are to be managed at the state level as it was prior to the year 2012. At the same time, more resources need to be dedicated for community education to better value the contribution of Flying Foxes in regenerating forests, and keeping landscapes healthy for the benefit of other species and people.

### **Feedback on the Review**

NQCC would like to take this opportunity to contribute to this review process which is focused on the *Flying-fox Roost Management Guideline*, the *Code of Practice—Ecologically sustainable management of flying-fox roosts* and the *Code of Practice—Low impact activities at flying-fox roosts*. In addition to this submission, we have provided comments on specific sections of the guidelines with suggested changes.

NQCC would like to see stronger language in these documents to ensure that all local councils conduct management of Flying Foxes to the highest standard, with no doubt about the need to minimise impacts on these species and that there is penalty for not adhering to the code.

NQCC supports the submissions made by the Cairns and Far North Environment Centre (CAFNEC) and Wildlife Queensland Townsville Branch. In particular, we would like to emphasise:


- **Protecting Threatened Species** - For management actions relating to a listed Threatened Species to be referred to the relevant act, either the *Nature Conservation Act 1992 (Qld)* or *Environmental Protection and Biodiversity Conservation Act 1999 (Cth)*
- **More time for input in to proposed management activities** - Notification periods to be longer to ensure communities and the Department of Environment and Science have more time to consider the impact of the proposed activities properly
- **Breeding and rearing seasons exempted** - Management Actions should not occur during breeding and rearing seasons
- **Better monitoring to account for the full impacts of management actions** - Monitoring recommendations need to also count orphaned or abandoned infant or juvenile Flying Foxes whether seen on the ground, in trees or taken into care because a proportion of these will not survive or be released back into the wild
- **Ecological importance of Flying Foxes** - The important ecological role of Flying Foxes in seed dispersal should be more explicitly described in the guideline, for example the Spectacled Flying Fox as a key seed disperser for the Wet Tropics World Heritage Area
- **Not permitting complete destruction of vegetation** - Destroying Flying Fox roosts should not be an option where threatened species are involved, or for any Flying Fox species
- **Stronger acknowledgement of climate change impacts** - The need to make reference to climate change which will lead to more frequent and more intense heat wave events causing major impacts on Flying Foxes
- **Those who value Flying Foxes need to be included** - The need to acknowledge residents and tourists who do value and appreciate Flying Foxes - to omit this is to encourage the adversarial view of Flying Foxes

NQCC acknowledges the guidelines for the inclusion of the need for extensive community education, the inclusion of information to counter some of the common myths about Flying Foxes, the recommendation for Councils to offer assistance to affected residents to reduce negative impacts and the high cost and ineffectiveness of various management practices covered within the guideline.

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Please contact our organisation if you would like any further information by emailing [campaigns@nqcc.org.au](mailto:campaigns@nqcc.org.au) or calling 0428 987 535.

Yours sincerely,

A handwritten signature in blue ink that reads "Tarquin Moon". The signature is written in a cursive style with a large initial 'T' and 'M'.

Tarquin Moon  
NQCC Campaigns Manager

