

30 September 2019

Department of Environment and Energy
Emailed to: MigratorySpecies@environment.gov.au

To whom it may concern

Submission: Draft National Light Pollution Guidelines for Wildlife Including marine turtles, seabirds and migratory shorebirds

Thank you for the opportunity to comment on the Draft National Light Pollution Guidelines for Wildlife (Draft Guidelines). This submission is made on behalf of the Queensland Conservation Council (QCC).

QCC is the Queensland's peak non-government environment organisation, with some 50 member groups as well as thousands of supporters. Our mission is to protect, conserve and sustain the state's unique natural environment, making sure that our wildlife and the places we love continue to thrive for future generations. A key aspect of this involves ensuring that adequate measures are in place to minimise and mitigate any adverse impacts on wildlife, including from artificial lighting.

QCC agrees with the sentiment of the Draft Guidelines that natural darkness has a conservation value and that artificial light negatively impacts on threatened and migratory species. We welcome the support that the Draft Guideline's best practice light management, design and approval conditions will provide in assessing development impacts. However, QCC would like to see more direction provided to state and local governments, including consistent assessment frameworks and criteria to ensure adequate protection of vulnerable wildlife

Rapid development is presenting increasing threats to Queensland's six marine turtle species and 34 species of migratory shorebirds. Birdlife Australia estimates shorebird populations have decreased dramatically since 1990, highlighting an urgent need for the adoption and implementation of best practice artificial lighting standards in Queensland. Without clear direction, such as minimum standards for developments to avoid artificial light pollution, habitat will continue to be incrementally lost to imposing projects such as the current Walker Corporation's proposal to destroy 40ha of Ramsar wetlands in Toondah Harbour.

We ask that QCC be informed of any developments and further consultation on the National Light Pollution Guidelines for Wildlife. Should you wish to discuss any aspect of this submission or contact us, please phone 07 3846 7833 or email lisa.cliff@qldconservation.org.au.

Yours Sincerely



Lisa Cliff

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Queensland Conservation Council