**Background and Instructions for commenting on *Cairns Flying-fox Relocation Management Plan R07, Cairns Regional Council***

**\*\*All submissions must include, name and contact details: address, number and email address and date to be valid.**

They should be Emailed to: [feedback@cairns.qld.gov.au](mailto:feedback@cairns.qld.gov.au) or posted to

Cairns Regional Council

119-145 Spence St,

Portsmith, Qld 4870

Include the title of application: *Cairns Flying-fox Relocation Management Plan R07, Cairns Regional Council*

Date notice published: 6th January 2020

**\*\*Applications are due COB 31 January 2020**.

You are welcome to use these notes and template for your individual response. If using the template, please personalise your submission as much as possible, by introducing yourself and your interest in Spectacled Flying-fox or how the proposed dispersal may affect you.

Of interest to you could be the tourism asset of the flying-foxes in the city; or impacts on you or your household, including pets, of noise and light every morning from 4am to 7am for the next 3 y to 5 years; the high possibility of flying-foxes scattered over the city trees and potential impacts on residents and businesses and on the flying-foxes; or the very high cost of the proposed action paid for by your rates. Council will consider these reasons.

Please include arguments for why this action could have a significant impact on the national population of spectacled flying-foxes. This is what the Department will base their decision upon.

**Background and process:**

During 2019, Cairns Regional Council (CRC) commissioned BioDiversity Australia to develop a dispersal plan (Flying-fox Relocation Management Plan -FFRMP) to move spectacled flying-foxes from the Cairns CBD Nationally Important Camp centred on Cairns City Library grounds.

This application was referred to the Commonwealth government as Referral 2019/8424 in April 2019. On 24 May 2019, the Department of Environment and Energy determined that the proposed action would be a controlled action and require assessment and approval under the EPBC Act. The assessment approach was by preliminary documentation requiring further information.

CRC provided the further information and as required under the referral process published this on 6 January for public comment until COB 31 January 2020.

Council is required to send to the Department its proposed plan (or revised plan if amended in light of the comments received) and all comments received within ten days of the closing date for comments.

The Department will then make a decision that the action is permitted as a controlled action, permitted as a controlled action with conditions or Not Approved, within 20 days of receiving the plan and comments from Council.

Council plans to disperse the flying-foxes, if approved, during May to July 2020.

Council has stated that if there are enough comments against the dispersal, it will not proceed. Council is obliged to reply in writing to every comment received.

**Notes on Relocation Plan R07 for Public Comment**

* The new Cairns Flying-fox Relocation Management Plan, RO7, has been prepared by a different consultancy, NRA Environmental Consultants, for current public consultation period.
* Note NRA report (RO7) is designed to give additional information on referral 2019/8424 and all previous comments on the referral are still valid. Refer previous comments on referral 2019/8424.
* However, there are contradictory statements regarding the relationship between RO7 and referral 2019/8424
  + *This R07 supersedes and replaces all previous documentation prepared.* - Document Control Summary
  + *Upon review and acceptance by the relevant regularly authority, will be adopted by CRC. This Flying-fox Relocation Management Plan does not repeat the information in the EPBC Act referral documentation; rather, it fulfils information gaps and provides the necessary clarity to inform the DoEE decision making process.* Page 1: introduction
* Upon request for clarification to council on 8 January it was stated that the Cairns Flying-fox Relocation Management Plan RO7 (The Plan) **does** supercede previous documentation prepared and that information in previous documents is not to be considered as a part of The Plan.
* While the previous plan has been superceded, this does not invalidate comments made regarding the proposed action under the referral 2019/8424 particularly with regard to significant impact, the likelihood of failure of the dispersal and contribution to increased human/flying-fox conflict. Comments on previous methodologies and inadequacies of the previous dispersal management plan specific to the referral 2019/8424 are no longer relevant in light of the new plan, but notice should be made of lack of detail of methodologies in the new plan where it is not clear if they take place of previous methodologies or follow those in the original application referral 2019/8424.

**Rationale for Dispersal**

The stated reasons for dispersal include:

* Damage to heritage trees
* Increased mortality rates at this camp
* Potential for heat stress events

**Other and related considerations**

* Council created this problem; the solution is not to move the flying-foxes because the site is restricted. Council permitted the removal of other roost trees creating the high reliance on heritage listed trees. Damage to trees not just from bats. Previous over-trimming is a factor.
* Increased mortality at camp has been linked to activities at the camp, in particular the construction of two hotels two seasons ago. Mortality rate this year is much lower as no activities at site or problems in overall region (eg food shortages, tick season etc)
* This camp fared best in the heat stress event of November 2018 as it is easier to manage because of the existing irrigation.
* Significant impact on an endangered species. Over 10% of national population breeds at this camp. All individuals of the Wet Tropics population (over 95% of entire national population) know this site and is likely to use it.
* CBD is Nationally Important camp and a maternity camp.
* Plan is to disperse the flying-foxes to Central Swamp. Central Swamp is an existing roost site, but if it fulfilled the same role, the city flying-foxes would all be there. It seems the city site may be essential in the network of camps the flying-foxes use. Taking this camp out of use reduces the roosting habitat of an endangered species.
* Increased risk of air strike in Cairns Swamp (preferred relocation site). The airport has deemed this unsafe for a release cage for orphaned and injured flying-foxes because of this increased risk.
* Failure rate of dispersals
* Potential for FF to fragment or set up splinter camps or settle in undesirable locations, like Esplanade. Dispersal disturbs the flying-foxes and they will look for next tree to roost in. High probability for them scattering all over the city. No vegetation corridor to “herd” them along to Central Swamp.
* Increased risk of injury particularly collisions and vehicle strike should flying foxes fragment and scatter throughout city
* Increased risk of contact with humans should FF scatter throughout city- persons may not have been educated about potential risks of transmission of disease should they be scratched or bitten (signs are at city camp but not over the city) and therefore potential increased human health risk
* Mixed messaging from council – council supports education and bat festival and provides support to Cairns bat carers but wants to disperse them out of the city.
* Cairns community is flying-fox ecologically illiterate. The mixed messaging is confusing. They do not understand why flying-foxes live in urban areas or how they use camps.
* Potential for increased human- flying-fox conflict because flying-foxes may roost in new places and inconsistent messaging from Council about flying-foxes.
* Duration of proposed action – 3 – 5 years until FF have abandoned CBD site
* That NRA states management of city bats likely to be for perpetuity (forever!)
* High cost of proposed action
* Inadequacies of dispersal plan including inadequate addressing of following required elements:
  + Objectives to avoid long term decline and strategies to achieve these
  + Pre and post monitoring
  + Assessment of potential relocation sites
  + Dispersal methodology – lack of detail
  + Contingency plan if bats end up in ‘wrong’ place
  + Public communication program- have you been adequately consulted?
* Lack of consideration of alternatives to dispersal- such as in situ management and enhancement of city habitat (eg expand habitat to median streets, plant more trees)
* Lack of consideration of tourism potential- many people visit Cairns just for bats already. There is a large untapped potential which could bring in many tourist dollars and boost the local economy.