

Dear Chief Fire Officer and Mr John Bradley,

CC: Office of the Conservation Regulator, The Hon Steve Dimopoulos



**Listed threatened wildlife recorded in areas proposed for log removal operations – Flora and Fauna Guarantee Act (FFG Act) and Environment Protection & Biodiversity Conservation Act (EPBC Act)**

Please accept this Technical Memo from the Victorian National Parks Association about the recordings of state and federally listed threatened species in areas proposed for log removal operations, in the Dandenong Ranges National Park.

The Yellow-bellied Glider and Powerful Owl are both listed as **Vulnerable** to extinction under the FFG Act. The Yellow-bellied Glider is also listed as **Vulnerable** to extinction under the EPBC Act. This technical memo details recordings of these species at the Kalorama – Tracks 13 Site and the Olinda – Bartlett Track sites proposed for log removal operations and post-logging burns.

Yellow-bellied Gliders have been recorded foraging within the proposed operational zones. A fledgling Powerful Owl has been recorded adjacent the proposed operational zones which suggests that the area is likely home to a breeding pair of the Vulnerable Powerful Owl. Further survey work is required to locate the nesting and roosting sites of this breeding pair and any nesting/denning sites or feed trees for the Yellow-bellied Gliders.

We note that these populations and their nesting/roosting/denning/feed sites were not raised by FFMV representatives during their survey of the sites for biodiversity values to avoid during log removal operations or post-logging burns.

Breeding season for the Yellow-bellied Glider is typically from August-December in Victoria. The summer period is also the time when young are left in the nest for over two months whilst the parents care for the young. Disturbance to the nest sites and the home ranges of these animals should be avoided throughout the spring-summer period.

Section 4B of the FFG Act sets out a clear duty and obligation on public authorities to consider potential biodiversity impacts when exercising their functions. We also note that the Scientific Advisory Committee has just made a preliminary recommendation that Salvage Logging of Burnt Forests be specified on the list of Potentially Threatening Processes under the FFG Act. We note that the impacts of salvage logging in storm-impacted forests are highly alike.

No information has been made public to outline how FFMV/DECCA will ensure their duty is being performed and that an action taken (or to be taken) does not threaten a listed taxon or community. This is leading to a high level of distrust in the community toward these and future works by FFMV/DECCA.

We understand that FFMV/DECCA has not referred these proposed operations to the Department of Climate Change, Energy, the Environment and Water for assessment under s70 of the EPBC Act.

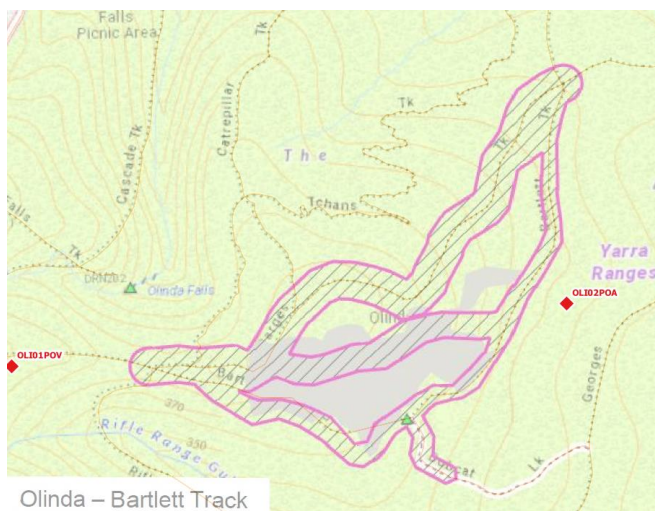
Under the Significant Impact Criteria, the proposed actions in the Dandenong Ranges National Park are likely to have a significant impact on the Yellow-bellied Glider – a Matter of National Environmental Significance - as there is a real chance or possibility that the actions will:

- *lead to a long-term decrease in the size of an important population of a species*
- *reduce the area of occupancy of an important population*
- *fragment an existing important population into two or more populations*

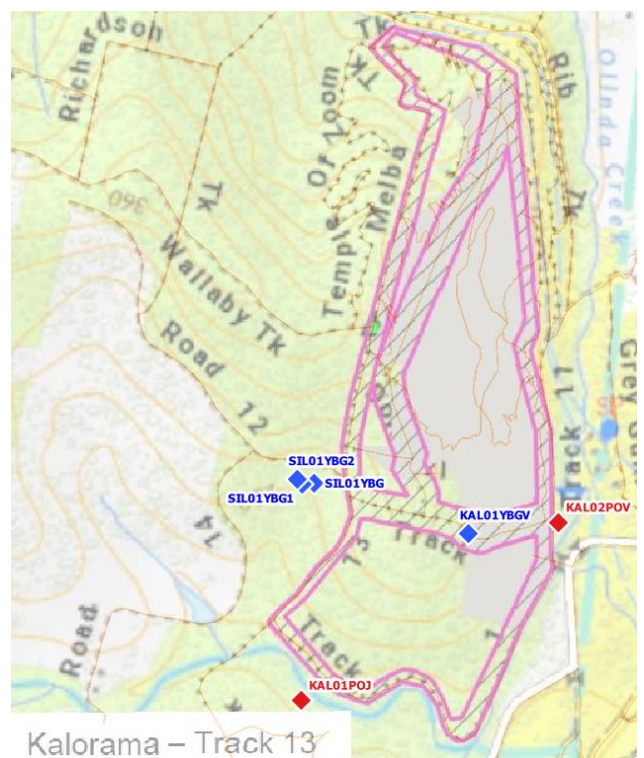
- *adversely affect habitat critical to the survival of a species*
- *disrupt the breeding cycle of an important population*
- *modify, destroy, remove or isolate or decrease the availability or quality of habitat to the extent that the species is likely to decline*
- *interfere substantially with the recovery of the species.*

## Recommendations

- Protect and avoid disturbance to all hollow-bearing trees throughout the Olinda and Kalorama Sites
- Further independent survey work is undertaken within the proposed log extraction areas to locate any nesting/roosting/denning/feed sites for the Powerful Owl and Yellow-bellied Gliders across the Olinda and Kalorama Sites, and buffer/exclusion zones are implemented
- Avoid machinery disturbance within the home ranges of Yellow-bellied Glider populations between the spring-summer period (key breeding stages)
- FFMV/DECCA make public their planning processes and how damage to park values and FFG Act / EPBC Act listed species and threatening processes will be avoided and minimised.
- FFMV/DECCA refer their proposed storm debris removal operations in areas of possible habitat of the Yellow-bellied Glider under s 70 of the *EPBC Act* for a decision as to whether the proposed operations are a controlled action under the Act



**Map 1. Threatened Fauna Records from the VNPA at the Olinda – Bartlett Track Site**



**Map 2. Threatened Fauna Records from the VNPA at the Kalorama – Track 13 Site**



Results – Images of threatened fauna detections below. Videos containing proof of locations can be provided upon request.



**Figure 1. Powerful Owl Detection on 4 May 2023 at waypoint 'OLI01POV'**





**Figure 2. Powerful Owl Detection on 17 November 2023 at waypoint 'KAL02POV'**



**Figure 3. Fledgling Powerful Owl Detection on 17 November 2023 at waypoint 'KAL01POJ'**



**Figure 4. Yellow-bellied Glider Detection on 6 October 2023 at waypoint 'SIL01YBG'**



**Figure 5. Yellow-bellied Glider Detection on 17 November 2023 at waypoint 'KAL01YBGV'**