VICTORIAN
NATIONAL PARKS
ASSOCIATION

South-eastern Long-eared Bat. *PETE WOODALL/INATURALIST*

SUBMISSION TO

Feedback on a draft National Recovery Plan for the South-eastern Long-eared Bat

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Feedback on a draft National Recovery Plan for the Southeastern Long-eared Bat (*Nyctophilus corbeni*).

The Victorian National Parks Association (VNPA) is an independent member-based organisation, working to improve protection of Victoria's biodiversity and natural areas, across land and sea. The VNPA has been actively working to protect Victoria's biodiversity for over 70 years

South-eastern long-eared bat (*Nyctophilus corbeni*) in Victoria

Overall the VNPA supports the Draft Recovery Plan for *N.corbeni*, but suggests greater emphasis on the need to mitigate management practices on public land such as so-called fire management operations, acquisition of suitable habitat on private into the protected areas estate and greater resourcing of survey efforts for the species.

Below we will outline additions to the Recovery Plan we believe must be to be represented.

Reliance on Old Growth Forests

Protection of old-growth woodland/mallee will be critical for the species survival. There is a strong need to protect all hollow bearing trees within its habitat including trees of small diameter that provide critical roosting habitat.

Old growth forests are harmed by firewood collection both legal and illegal, use of prescribed fire, grazing by stock and direct land clearing. These threats remain in Victoria as a known hot spot for the species is in the Nowingi area[1] which remains as unprotected public land which allows logging and grazing.

There is a need for no go areas for use of fire and firewood collection based on the species needs as the species is closely associated with long-unburnt mallee vegetation[2] with even relatively mild fires[3] have been reported to result in decreased availability of preferred tree hollows[4].

So called hazardous tree removals prior to prescribed fire are known to target hollow bearing trees. Loss of hollow bearing trees must be a listed threat to *N.corbeni* with a mitigation plan put in place to improve the amount of hollow bearing trees and old growth unburnt forests in the species habitat.

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[1] Threatened Species Assessment. Nyctophilus corbeni. South-eastern Long-eared Bat. Department of Land, Water and Planning (2021) https://bio-prd-naturekit-public-data.s3.ap-southeast-2.amazonaws.com/species_assessments/Nyctophilus_corbeni_61332.pdf

[2] Lumsden, L., Nelson, J., and Lindeman, M. (2008). Ecological research on the Eastern Long-eared Bat Nyctophilus timoriensis (south-eastern form). A report to the Mallee Catchment Management Authority. Arthur Rylah Institute for Environmental Research, Department of Sustainability and Environment, Heidelberg.

[3] Parnaby, H., Lunney, D., Shannon, I., and Fleming, M. (2010). Collapse rates of hollow-bearing trees following low intensity prescription burns in the Pilliga forests, New South Wales. Pacific Conservation Biology 16, 209-220

[4] Parnaby, H., Lunney, D., and Fleming, M. (2011). Four issues influencing the management of hollow-using bats of the Pilliga forests of inland New South Wales. In The biology and conservation of Australasian bats (Eds B. Law, P. Eby, D. Lunney, and L. Lumsden.) pp. 399-420. Royal Zoological Society of New South Wales: Sydney.

Greater Regulation of Fire Management Operations

In 2016, Victoria's environment department found that '*planned burns unambiguously and substantially increased the collapse probability of hollow-bearing trees*'[5]. The study also found that the collapse rate of hollow bearing trees in areas mapped as burnt was 19.3 per cent, which is 22.4 times greater than trees in control areas. This study only included trees affected by fire and does not account for trees removed after being assessed as 'hazardous' or from roadsides and other areas within the burn site.

Victorian Auditor-General's Office report found that 'With the exception of some isolated case studies, DELWP [now DEECA] does not know the effect of its burns on native flora and fauna.'[6] This highlights the lack of independent oversight of fire management operations, awareness of ecological management and legal requirements and care within Forest Fire Management Victoria.

Fire Management Operations should be listed as a threat to *N.corbeni.* There is also a need for the planning of no-go zones for prescribed fire and firewood collection in *N.corbeni* habitat.

Acquisition of habitat sites into protected areas estate

There is a need to acquire private land into the conservation estate to protect suitable habitat of *N.corbeni* and increase the size of large areas of bushland which the species is more abundant within[7].

There is a need to reinstate and fund a program such as the former National Reserve System Program of the Commonwealth Government's Natural Heritage Trust from the early 2000s that would seek out and purchase additions to current protected areas or suitable habitat for threatened species.

An Action of the recovery plan must be to secure more habitat for the species as well as funding to do so from State and Federal governments.

Filling Knowledge Gaps

There is a strong need for a better handle on population and distribution of *N.corbeni* particularly in Victoria. A new population was found in the Gunbower National Park in Victoria in 2021 only because funding was made available following floods in the area[8].

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[5] Bluff, L, DELWP (2016) Reducing the effect of planned burns on hollow-bearing trees: Fire and adaptive management report no. 95. https://www. ffm.vic.gov.au/__data/assets/pdf_file/0006/21120/ Report-95-Reducing-the-effect-of-planned-burnson-hollow-bearing-trees-2016.pdf

[6] Victorian Auditor-General's Office (2020) Reducing Bushfire Risks October 2020, p. 69

[7] Turbill, C. and Ellis, M. (2006). Distribution and abundance of the south eastern form of the Greater Long-eared Bat Nyctophilus timoriensis. Australian Mammalogy 28, 1-7.

[8] Flood recovery: tracking the Southeastern Long-eared Bat in Gunbower Confirming a range extension in Victoria for this threatened microbat (June 2024) DEECA https://www.ari.vic.gov.au/__data/assets/pdf_file/0021/717231/Flood-Recovery-bat-fact-sheet-2024.pdf

The species is known to be hard to pick up on audio monitoring as they sound like other co-occurring long eared bat species[9]

There is potential of using citizen scientists to locate and monitor the species once the issue of recognising the call of *N.corbeni* from other species in the areas.

There is a need for the Recovery Plan to add an Action of the plan to development of call recognisers for *N.corbeni* this will require funding from state and federal governments.

Recovering Responsibilities in Recovery Plans

The current draft recovery plan for *N.corbeni* doesn't make clear who is responsible for implementing the Vision as well as the Recovery objectives, performance criteria and actions of the plan.

In former Recovery Plans such as the Recovery Plan for *Allocasuarina portuensis (2000)* as well as other recovery plan lay out clearly who is responsible for implementing the recovery actions for the species as well as a clear implementation budget and schedule for actions from the recovery plan.

Without such a implementation budget and schedule and delegation of responsibilities this action plan will become will only be a report on a desk. Both State, Local and Federal departments must be made responsible under the Recovery Plan for recovering the species.

[9] Flood recovery: tracking the Southeastern Long-eared Bat in Gunbower Confirming a range extension in Victoria for this threatened microbat (June 2024) DEECA https://www.ari.vic.gov.au/__data/assets/pdf_file/0021/717231/Flood-Recovery-bat-fact-sheet-2024.pdf