VICTORIAN
NATIONAL PARKS
ASSOCIATION

Southern Brown Bandicoot (*Isoodon obesulus obesulus*). *RICARDO SIMAO*

SUBMISSION TO

Draft National Recovery Plan for the Southern Brown Bandicoot (Eastern) 2025

1 December 2025

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Submission: Draft National Recovery Plan for the Southern Brown Bandicoot (Eastern) (*Isoodon obesulus obesulus*) 2025

The Victorian National Parks Association (VNPA) welcomes the opportunity to provide feedback on the new draft Recovery Plan for the Southern Brown Bandicoot (Eastern). VNPA is an independent member-based organisation, working to improve protection of Victoria's biodiversity and natural areas, across land and sea, for over 70 years.

Our staff have extensive experience with threatened species protection and recovery and have conducted ecological and social research on Southern Brown Bandicoot conservation in Victoria and are active in the Southern Brown Bandicoot Recovery Group.

VNPA supports recovery planning that addresses the governance challenges, the on-ground management actions, the scientific research needs and the community of organisations to successfully implementation a plan to both stop the active decline and to support the recovery of threatened species, such as the Southern Brown Bandicoot. As such, we use the following criteria to assess draft recovery plans.

1. Does it provide 'SMART' (Specific, Measurable, Achievable, Relevant, Timed) objectives?
2. Does it address how it will manage and reduce threatening processes?
3. Does it act to stop loss of habitat and plan to increase habitat quality and availability?
4. Does it address gaps in knowledge for the conservation of the species and include a plan to address those gaps?
5. Does it include a long-term species monitoring program that will evaluate population and habitat trends and check the effectiveness of Recovery Plan actions?
6. Does it include an implementation plan with assigned responsibilities and associated budget and timeline?
7. Does it recognise all collaborators required for the success of the plan?
8. Ultimately, will the plan's success increase the probability of the long-term survival of Southern Brown Bandicoots in the wild?

RECOVERY PLAN ASSESSMENT

1. Does it provide 'SMART' objectives? (Specific, Measurable, Achievable, Relevant, Timed)

"The objectives of this recovery plan are to: (page 25)

- *Halt the population decline of the southern brown bandicoot.*
- *Prevent any further contraction of the southern brown bandicoot's range.*
- *Improve connectivity between southern brown bandicoot populations."*

While they are relevant, these objectives are very vague and while some may be able to be measured it is unlikely they will inspire accurately targeted actions that are achievable – particularly if there is not a clear assessment of current bandicoot habitat available, the level of connectivity, an assessment of what will likely be lost to development or fire, and if there are opportunities to secure new areas of habitat that could accept translocations.

The performance criteria in the recovery plan, while on the right track, lacks specifics and only indicates a timeline for review in 2035. That is only 9 years away and while immediate implementation for many actions is essential, there also needs to be a longer-term mechanism for reviewing the status of the recovery actions and the overall status of the species across a longer time frame. There are no budget estimates provided.

2. Does it address how to manage and reduce threatening processes?

Recovery plan identifies the threats of particular concern are:

"... threats of fire, habitat modification and predation, increasing pressure on populations from urban development, and the declining genetic health of isolated populations."

Habitat loss, modification, and fragmentation: land clearing for agriculture and urban development (including road construction and clearing of weeds) is a growing threat to bandicoots and their habitat. While they are adaptable to altered landscapes, the sheer pace of conversion of farmland to high density urban communities in areas like Southeast Melbourne is too fast for bandicoots to adjust and find alternative habitat areas.

The plan for threat abatement outlines actions that should be taken but does not describe how or outline what regulatory changes are needed, who is responsible, and how much money needs to be secured for implementing them. It relies on linking actions to existing national threat abatement plans and to ensure they 'align with this national strategy' but does not state how they need to be implemented for Southern Brown Bandicoots specifically.

For example: Action 1.3 - Limit predation by domestic pets (cats) is a priority 1 action to be implemented by local councils. It reads...

"Domestic pets, especially cats, can have significant impacts on populations of threatened species near towns and cities. Encourage pet owners to keep domestic animals contained to their properties and consider establishing cat containment laws in suburbs surrounding populations impacted by domestic cat predation. This should include recognition of unowned or feral cats as a pest species in each jurisdiction. Improve public appreciation of the impact of domestic pets on threatened species." (page 27)

"*encourage* pet owners..."?

"*consider* establishing cat containment laws..." ?

These ‘actions’ are just suggestions. The recovery plan needs to be the tool for defining what the actions need to be *specifically* so the organisations implementing them know what to do and how to do it to get the intended outcome.

The recovery plan should contain actions like:

1. Identify local councils across bandicoot habitat. Present the recovery plan to them and assist with getting it integrated into their governance, land management and local laws departments, and community outreach programs.
2. All the councils must have at minimum cat containment laws, and where required, restriction laws in place.
3. All the councils have community education programs for responsible cat ownership, including requirements for pet cats to be registered.
4. Funding or training support for all councils to help them implement these actions.

Fire & drought:

There needs to be a trigger in place during the planning process for an assessment of Southern Brown Bandicoot habitat prior to planned burns. This should go beyond the Victorian Biodiversity Atlas and include records from the Atlas of Living Australia and iNaturalist.

In areas of planned burns, efforts must be made to ensure patchy burns that do not remove all the grasses and understory shrubs. A percentage of habitat retained during fires should be determined, and if burns go above this amount, immediate temporary shelters should be put in place and fox and cat control implemented.

Habitat should be assessed during times of drought and temporary shelters, and food and water sources considered where practicable.

Collisions with motor vehicles:

Existing roads within known bandicoot habitat should have traffic calming measuring, bandicoot awareness signs and a slower speed limit, particularly at night to reduce the risk of bandicoots being killed by cars. New developments should plan roads accordingly and install underpasses to allow bandicoots to cross under roads safely. Standards should be determined for different road types, sizes and locations for consistent implementation. The use of iNaturalist to record bandicoot roadkill should be promoted within communities around bandicoot habitat to identify key danger zones for bandicoots so traffic controls can be rolled out in the right places.

Loss of genetic diversity:

Keeping habitat intact must be a priority in new developments. Habitat must be retained during development and not cleared, and then immature plants added later – there must be continuity of habitat. New developents in bandicoot habitat should require bandicoot gates (developed by the Royal Botanic

Gardens Cranbourne) to allow bandicoots to move through an area with fenced properties, particularly when the planning scheme stipulates solid fences.

Southern Brown Bandicoot killed during road work operations. Koo Wee Rup. 2023. Jordan Crook

3. Does it act to stop loss of habitat and plan to increase habitat quality and availability?

All bandicoot habitat needs to be mapped across their range to enable adequate protection and to be able to calculate changes in area size or location. All land management agencies and landowners across bandicoot habitat should be aware of their presence and the requirements to protect individuals and essential habitat elements. Any planned loss of bandicoot habitat must first find replacement habitat for all for the translocation of the threatened population or the expansion of another population. All planning decisions should aim for a net gain in habitat for all developments. Habitat quality and availability should be monitored and mapped prior to any development or change in use, and after, to calculate the area of lost habitat. Significant areas of habitat on private land should be purchased for protection where possible.

4. Does it address gaps in knowledge for the conservation of the species and include a plan to address those gaps?

The draft recovery plan acknowledges that some areas of the species' range is understudied and other areas where they are regularly surveyed (page 12). When all areas of bandicoot habitat are mapped, the level of monitoring for each area should be assessed. Where areas are understudied, a program to promote the need for research in these areas should be promoted to relevant local universities.

5. Does it include a long-term species monitoring program that will evaluate population and habitat trends and check the effectiveness of management actions?

A range of monitoring programs should be continued, and new ones developed, to address gaps in knowledge and to check for changes to habitat, habitat use and population changes over time. Monitoring for threats should also continue including predator numbers, the effectiveness of predator control measures and social research on community awareness and conservation programs – particularly with pet cat controls to ensure regulations are being followed.

Citizen science is an excellent way to monitor bandicoots across a wide area. iNaturalist projects can be used to collate records of bandicoots, feral cats and foxes to help map out habitat range and predator hot spots.

6. Does it include an implementation plan with assigned responsibilities and associated budget and timeline?

The recovery plan includes a list of conservation actions with priorities and assigned implementors, but it lacks detail for the context in which these actions are mandated, for example in planning schemes or land management protocols. There needs to be a specific order, or the responsibility for the actions remains unclear and may be overlooked. What are the responsibilities for different levels of government under different Acts of Parliament, where do responsibilities for protecting bandicoots and their habitat come up in governance or broader programs. What are the budget estimates for different actions? Knowing this would make it easier for government agencies to seek funding for implementing conservation actions. Breaking the actions into more specific units with clear responsibilities and oversight would make them more effective in an implementation plan.

The performance criteria in the recovery plan, while on the right track, lacks specifics and only indicates a timeline for review in 2035. That is only 9 years away and while immediate implementation for many actions is essential, there also needs to be a longer-term mechanism for reviewing the status of the recovery actions and the overall status of the species across a longer time frame.

7. Does it recognise all contributors required for the success of the plan?

The recovery plan does not include an extensive review of other current, or past, actions plans, strategies or programs working towards saving the bandicoots from extinction. Considering these would assist with identifying all the contributors to bandicoot survival from landowners to community groups, citizen scientists, and developers to zoos and government land management agencies. While the Melbourne Strategic Assessment is referenced, it only looks at the summary on the website and not into the detail included in the Sub-regional Strategy for the Southern Brown Bandicoot which provides a lot of information on the range of contributors in bandicoot conservation and the range of actions required in areas of new urban development. Now that many of these developments have been completed, learning from what actions worked or didn't work would be very useful to help identify barrier and opportunities to related conservation actions in the national recovery plan to improve its likelihood of success.

The recovery plan overstates the role of different members of the Southern Brown Bandicoot Recovery Group. This is not an official recovery team, but a group of concerned members who formed the group in

lieu of a recovery team to combine knowledge and experience in moving Southern Brown Bandicoot conservation forward. Only government agencies conducted predator control or habitat restoration activities. Many others assist with a range of monitoring programs.

"A separate regional recovery team for the southern brown bandicoot operates in south-east Melbourne with a focus on the Western Port area. The Western Port Biosphere Foundation acts as secretariat and the recovery team consists of species experts, and representatives from Parks Victoria, Royal Botanic Gardens (RBG) Cranbourne, DEECA, Bass Coast Landcare Network, Phillip Island Nature Parks, Melbourne Water, Metro Trains, local councils, NRM groups and universities. The regional recovery team and its member organisations have supported numerous conservation projects in south-east Melbourne including predator control, habitat restoration and ongoing monitoring programs." (page 5)

The draft recovery plan states bandicoot conservation is integrated into relevant public land management plans like those for Parks Victoria. However not all management plans are up to date or include adequate information about the bandicoots and how to protect them. For example, the management plan for Bunyip State Park (PV, 2007; published in 1998 and slightly amended in 2007) does not mention Southern Brown Bandicoots at all despite there being an important population there. Hopefully, the new recovery plan will support an update for this out-of-date management plan.

8. Will the plan's success increase the probability of the long-term survival of Southern Brown Bandicoots in the wild?

This national recovery plan is long overdue, and unfortunately, we are underwhelmed by this draft. Rather than a detailed outline of what needs to be done now to stop the decline of the Southern Brown Bandicoot, it reads like a desktop study on bandicoot conservation and lacks the level of understanding and detail required to bring about real change for this species.

There is a strong need for the Commonwealth to fully fund and support the existing Recovery Team to oversee the roll out of recovery actions.

It is very general and passive; it comes after a range of conservation planning done for the bandicoots over the last decade in the absence of a national recovery plan, and it will not lead from the front – as it should. The absence of a recovery team behind the development of this recovery plan is evident as it lacks the knowledge required to create a realistic, detailed plan of action to support bandicoot conservation in the future.

It includes no realistic timelines, and no budget assessments so realistically, how is it going to get support or funding if the thinking has not been done here?

It offers no new information or ideas for bandicoot conservation and does not genuinely advocate for the species. Southern Brown Bandicoots are being decimated by the juggernaut of urban expansion and all the roads and pet cats that come with them. They are ignored in planned burn operations with no fire adjustments made to protect their habitat, and no predator or habitat recovery actions put in place afterwards.

Southern Brown Bandicoots need a recovery plan that forces them into the spotlight, to make their presence noticed and respected by planning departments, land managers, and communities that live with them. This recovery plan will not achieve this. At best it will tick the box for a requirement under the EPBC

Act and then be left on a shelf until it ages out, and the community once again pushes it to be updated. At worst it will bring down the expectations of any plans created after it to reduce threats to the bandicoots and allow them to be downgraded behind poorly designed urban sprawl by aggressive developers and unnecessarily destructive fire regimes.

We recommend looking at the recovery plan for the Mainland Eastern Barred Bandicoot as a template and to establish an appropriate recovery team to develop a comprehensive recovery plan that outlines conservation actions in a clear way, with responsibilities and with associated budget requirements so they can monitor progress over time and advocate for the species.

Thank you for your consideration of this review of the draft Recovery Plan. We recognise this is a very challenging process and we hope our recommendations will help improve this recovery plan before it is completed. Please contact us for any further clarification or to discuss further.

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References

Department of the Environment, Land, Water and Planning (DELWP), 2021. National Recovery Plan for the Mainland Eastern Barred Bandicoot *Perameles gunni*i (Victorian subspecies). Australian Government, Canberra.

Parks Victoria (PV), 2007. “Management Plan for Bunyip State Park”. Parks Victoria, Melbourne.

Department of Environment and Primary Industries (DEPI), 2014. Sub-regional Species Strategy for the Southern Brown Bandicoot, Victorian Government, Melbourne.