Red-tailed Black-Cockatoo Recovery Project

Redtail@birdlife.com.au
www.redtail.com.au

21st February 2025

Subject: SeRtBC Recovery Team Draft Position Statement to wind turbine development in the Red-tail's range.

To Whom it May Concern,

The South-eastern Red-tailed Black Cockatoo (SeRtBC) Recovery Team supports an environmentally-responsible transition to renewable energy as part of a suite of initiatives to mitigate climate change. This includes for the benefit of biodiversity under pressure from climate change impacts. However, we recognise that both the construction and operation of renewable energy infrastructure such as wind turbines, can have a significant impact on birds and other wildlife and measures must be taken to minimise these impacts.

The following points outline our position on wind turbine development within the range of the SeRtBC:

- The recovery of the endangered SeRtBC is our highest priority, we do not support policy or development that undermines the capacity now or in the future to achieve recovery.
- Where SeRtBC may be impacted and/or are identified as a species of concern, we strongly encourage planning approvals that have a focus on supporting recovery and aim to deliver a net gain for the species.
- We believe that there are areas that will likely always be inappropriate for development due to the high risk of impact on SeRtBC.
- Based on their flight patterns and behaviour, the extent of flight across their range, and their small population, we believe that SeRtBC are vulnerable to the impact of wind turbine development within their range. In the absence of comprehensive data on SeRtBC movement across their range, or specific research on the impacts, we believe the precautionary principle should be applied.
- The scope of impact should include both current impact and future foreseen lost opportunities to improve the conservation trajectory of the bird, such as revegetating habitat in strategic locations across the landscape.
- The SeRtBC is a culturally significant species to First Nations groups across its range and we strongly encourage consultation with these communities on any proposed development.
- We strongly encourage adherence to the mitigation hierarchy with a particular focus on avoiding impact by avoiding development in proximity to SeRtBC habitat and SeRtBC flight pathways across their range which is both the most effective and affordable strategy for avoiding impact.
- Industries that benefit from development approvals should be required to identify and demonstrate low-risk sites in preference to funding site specific mitigation plans where there is an increased biodiversity risk.
- Curtailment of wind turbines has long been accepted as a means of reducing birds' risk of fatal collisions with wind turbines, but this has not been proven for SeRtBC. Australian and species-specific studies are needed to validate curtailment as an effective means of collision risk reduction for various target species before this can be accepted as an effective mitigation measure for a given project.
- To ensure the integrity of development approvals, proponents must provide management plans that outline how the mitigation hierarchy was applied, monitoring and reporting protocols and adaptation strategies to be applied should the impact exceed the initial estimate, prior to approval. These plans should be evidence-based, publicly available and enforceable.

- Monitoring for impact must be built into the cost of development and operation, the protocol must meet best practice standards, be consistent and comparable with similar monitoring efforts to enable the comparison and collation of data and the results should be publicly available.
- We recognise available habitat mapping is limited by the extent of previous survey and research investment; consequently maps, models and advice must be iterative to incorporate new information including the impacts of climate change on the status, response, range and behaviours of the SERTBC and its habitat. Ongoing investment by government and developers to understand the needs of the birds and the impacts of wind turbine development needs to be put in place to support the integrity of planning approval frameworks.
- Development must consider the risk of cumulative impact, including other wind turbines and/or development in the range of the SeRtBC and the potential impact of significant impactful events such as wildfire or drought within the SeRtBC range. Investing in the delivery of regional biodiversity/landscape plans to build resilience is one way to reduce this risk long-term.
- Processes for assessment and reporting should be transparent.
- Obtaining expert advice, particularly the SeRtBC Recovery Team, at key stages in the approval process and post development reviews should be mandatory to ensure the integrity of EIA reports, management plans, and adaptive responses.
- We support the development of guidelines specific to SeRtBC to ensure best practice. The Recovery Team is well placed to provide lead advice on the development of such guidelines and should be supported to do so.
- Processes for consultation must be adequate to facilitate experts, stakeholders and the public to contribute to decision making.

Potential risks to SeRtBC posed by wind turbine development:

- Clearance of nesting (old trees with hollows) and/or feeding habitat
- Barriers to access nesting and/or feeding habitat and between nesting and feeding habitat
- Barriers to access water sources e.g. dams, troughs, surface water
- Mass mortality events when birds are moving in large feeding flocks between feeding habitat blocks and/or to water sources nearby
- Breeding partner mortalities while moving to/from feeding or drinking sites during nesting
- Barriers to undertaking revegetation or enhancement of suitable habitat or nest protection because of the risk of bird mortality or access barriers. Red-tail recovery relies on boosting population numbers through increasing the amount and quality of feeding and nesting habitats and reducing threats to successful nesting
- Alienation from limited feeding, roosting and nesting sites.
- A limited ability to recover from mortalities due to low reproductive rates due to single egg clutches.

Yours sincerely,

Vicki-Jo Russell AM
Chair, South-eastern Red-tailed Black-Cockatoo Recovery Team