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The Director  
Marine and Freshwater Species Conservation Section  
Wildlife, Heritage and Marine Division  
Department of the Environment  
GPO Box 787  
Canberra ACT 2601

January 16, 2015

**Re: Comments on Listing Eligibility and Conservation Actions for *Pedionomus torquatus* (Plains-wanderer)**

Dear Sir/Madam,

The Nature Conservation Society of South Australia (NCSSA) welcomes the opportunity to provide comments on the Listing Eligibility and Conservation Actions for *Pedionomus torquatus* (Plains-wanderer) and appreciates the extension of time granted to enable us to do this. As South Australia's primary nature conservation advocacy organisation, the NCSSA has an active interest in the protection and conservation of South Australia's natural resources with particular attention being paid to nationally and state listed threatened plants, animals and ecological communities.

Since 1962, NCSSA has played a key role in establishing and expanding the reserve system in South Australia by promoting the protection of key biodiversity assets through the dedication of reserves and by undertaking ecological research to inform their management. Our current and past activities also address the significant need for ongoing management and monitoring both within parks and across the broader landscape to provide long-term conservation of biodiversity.

Please refer to the following pages for our comments on the EPBC Act listing eligibility and associated conservation actions. If you would like to clarify or discuss any of the points raised please contact me on (08) 7127 4633 or via email at [nicki.depreu@ncssa.asn.au](mailto:nicki.depreu@ncssa.asn.au)

Yours sincerely,

Nicki de Preu

Conservation Ecologist

Our comments on the questions in the consultation document for the Plains-wanderer are as follows:

1. *Do you agree with the current taxonomic position of the Australian Faunal Directory and Birdlife Australia for this species (as identified in the draft conservation advice)?*

We agree with the listing of this species as Vulnerable given the restricted geographic distribution, observed continuing decline in area of occupancy and extent and quality of habitat and ongoing impacts of key threatening processes affecting population numbers.

2. *Can you provide any additional references, information or estimates on longevity, age of maturity, average life span and generation length?*

No.

3. *Has the survey effort for this species been adequate to determine its national distribution and adult population size?*

We believe that further survey effort is required to determine extent of occurrence and area of occupancy of the Plains-wanderer in South Australia. The report by Bellchambers & Baker-Gabb (2006) provides further details on recent surveys in the north-east pastoral areas of South Australia. This report recommends additional structured surveys for Plains-wanderers in specific areas on Boolcoomatta Station to give a more accurate estimate of relative abundance. This report also concludes that the low densities of the Plains-wanderer in arid areas such as north-east South Australia and south-western Queensland (particularly during prolonged dry periods), coupled with large areas of potentially suitable habitat, makes their detection even more difficult than in more mesic areas such as New South Wales. Irregular and unpredictable rainfall events that are characteristic of these arid areas can result in large population fluctuations that make it even more difficult to accurately determine population size.

4. *Do you accept the estimate provided in the nomination for the current population size of the species?*

We accept the estimate for the current population size of this species however recommend that a precautionary approach is applied to this estimate due to the cryptic nature of the species, inferred continuing decline in the number of mature individuals and the species' area of occupancy (Garnett et al., 2011) and variable densities across the species range.

5. *For any population with which you are familiar, do you agree with the population estimate provided? If not, are you able to provide a plausible estimate based on your own knowledge?*

We have not conducted targeted surveys for this species so cannot offer any additional information about population estimates.

6. *Can you provide any additional data, not contained in the current nomination, on declines in population numbers over the past or next 10 years or 3 generations, whichever is the longer?*

No.

7. *Is the distribution as described in the nomination valid? Can you provide an estimate of the current geographic distribution (extent of occurrence or area of occupancy in km<sup>2</sup>) of this species?*

We consider the distribution described in the nomination to be valid and do not have any further information on the extent of occurrence or area of occupancy.

8. *Has this geographic distribution declined and if so by how much and over what period of time?*

We do not have any additional information about the decline in geographic distribution or timeframe that this has occurred in. The ongoing impact of grazing by sheep is highly likely to have affected habitat quality in South Australia since the 1870's particularly with the more recent introduction of dorper breeds that have a broader diet than traditional merinos. Excessive grazing and trampling of

habitat by overabundant kangaroos inside the Dog Fence in South Australia would have also contributed to the ongoing decline of this species.

9. *Do you agree that the species is eligible for inclusion on the threatened species list, in the category listed in the nomination?*

The Plains-wanderer is currently listed under the EPBC Act as Vulnerable and we agree that this rating is appropriate given the restricted geographic distribution, observed continuing decline in area of occupancy and extent and quality of habitat and ongoing impacts of key threatening processes affecting population numbers.

10. *Do you agree that the threats listed are correct and that their effects on the species are significant?*

We consider the threats listed for this species (Page 4 of the Consultation document) to be accurate and that without some form of intervention their effects are highly likely to be significant resulting in further decline of localised populations and subpopulations. We recommend that additional threats listed on Pages 2-3 of the Approved Conservation Advice (DoE 2014) are also acknowledged including inappropriate fire regimes and habitat disturbance by rabbits. Predation by feral cats is also likely to be a significant threat to this species particularly in areas where rabbits are abundant that can support a higher cat population. Excessive grazing by kangaroos is an additional threat to this species that needs to be addressed, particularly on land managed for conservation.

11. *To what degree are the identified threats likely to impact on the species in the future?*

Identified threats are highly likely to impact on this species in the future if left unmitigated.

12. *Can you provide additional or alternative information on threats, past, current or potential, that may adversely affect this species at any stage of its life cycle?*

We have no further information on the way various threats may adversely affect this species although current climate change models for Australia's arid and semiarid regions indicate that both variability and unpredictability of average annual rainfall is likely to increase (Hughes, 2003) that will have adverse effects on habitat quality and could lead to extinctions of local subpopulations.

13. *In seeking to facilitate the recovery of this species, can you provide management advice for the following:*

- *What individuals or organisations are currently, or need to be, involved in planning to abate threats, and any other relevant planning issues?*  
Department of Environment, Water & Natural Resources (DEWNR), NGOs including Bush Heritage Australia, Australian Wildlife Conservancy, Nature Foundation SA & NCSSA, South Australian Arid Lands and Northern & Yorke NRM Boards, Consultants/expert ornithologists for specific knowledge of sites, survey techniques and monitoring.
- *What threats are impacting on different populations, how variable are the threats and what is the relative importance of the different populations?*  
We have no further information on the way various threats are impacting different populations or their degree of impact.
- *What recovery actions are currently in place, and can you suggest other actions that would help recover the species? Please provide evidence and background information.*  
Broad-scale fox baiting and goat control is currently undertaken by DEWNR on the Bimbowrie Conservation Park and adjacent Plumbago Station in the North-east Pastoral District of South Australia. Bush Heritage Australia also conduct regular fox baiting and rabbit control on Boolcoomatta Reserve. Further investigation of a baiting program targeting feral cats is warranted to reduce the threat of predation.

The report by Bellchambers & Baker-Gabb (2006) recommended the following actions to mitigate threats and support recovery of the species in South Australia:

- Grazing by domestic stock is unlikely to be an appropriate management tool due to the sparse nature of vegetation and low rainfall.
- Artificial water points on landholdings managed for conservation should be decommissioned where no longer needed to prevent an undesirable, excessive build-up of kangaroo numbers.
- The application of the locust-specific fungus marketed as “Green Guard” in any locust control operations where the Plains-wanderer is known to occur.

14. *Can you provide additional data or information relevant to this assessment?*

We strongly support the development of a Recovery Plan to guide management and conservation of the Plains-wanderer across its range. The plan should include listed research priorities and management actions in the Approved Conservation Advice (DoE 2014). We strongly recommend that a long-term and rigorously designed monitoring program is implemented to enable population trends to be assessed and allow for early detection of further declines.

15. *Can you advise as to whether this species is of cultural significance to Indigenous Australians?*

We are unable to advise whether this species is of cultural significance to the traditional owners of country where the species is known to have occurred either historically or currently. DEWNR’s Aboriginal Partnerships Unit may be able to provide further advice about who the appropriate person/s would be to contact about this advice.

## **REFERENCES**

Department of Environment (2014). Approved Conservation Advice for *Pedionomus torquatus* (plains-wanderer).

Bellchambers K and Baker-Gabb D (2006). *A survey of plains-wanderer and thick-billed grasswrens in the north-east pastoral zone of South Australia*. Prepared for South Australian Arid Lands Natural Resources Management Board.

Garnett S, Szabo J and Dutson G (2011). *The Action Plan for Australian Birds 2010*. CSIRO Publishing.

Hughes, L. (2003). Climate change and Australia: Trends, projections and impacts. *Austral Ecology*, 28: 423–443.