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The Director
Migratory Species Section
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Wednesday 25 May 2022

Re: Consultation on listing eligibility for *Stipiturus malachurus parimeda* (Eyre Peninsula southern emu-wren)

To whom it may concern,

The Nature Conservation Society of South Australia (NCSSA) appreciates the opportunity to comment on the listing eligibility for *Stipiturus malachurus parimeda* (Eyre Peninsula southern emu-wren) and the extension of time to do so. Since 1962, the NCSSA has been a strong advocate for the protection of native vegetation and biodiversity in South Australia with particular attention being paid to nationally and state listed threatened plants, animals and ecological communities and the management of protected areas.

The NCSSA supports the transfer of this subspecies from 'vulnerable' to 'endangered' and concurs with the assessment of the subspecies against the criteria for listing under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) as presented in the draft listing advice. The transfer will bring the subspecies' status into line with that recognised in each edition of the Action Plan for Australian Birds since 1990 and as well as under the South Australian *National Parks and Wildlife Act 1972*.

Updated information about the subspecies' status required

The NCSSA notes that there has been no systematic assessment of the subspecies' total population size and distribution for 20 years. The draft listing advice states that several populations are thought to have been extirpated, including possibly as recently as December last year (2021) due to a bushfire impacting the 'South Block' population to an unconfirmed extent.

Updated information about the subspecies is critical to ensuring recovery actions are best directed, therefore the NCSSA recommends adding 'systematic survey of the subspecies' population size and distribution' to the subspecies' 'Conservation and management' priorities as identified in the draft listing advice.

Protect existing populations

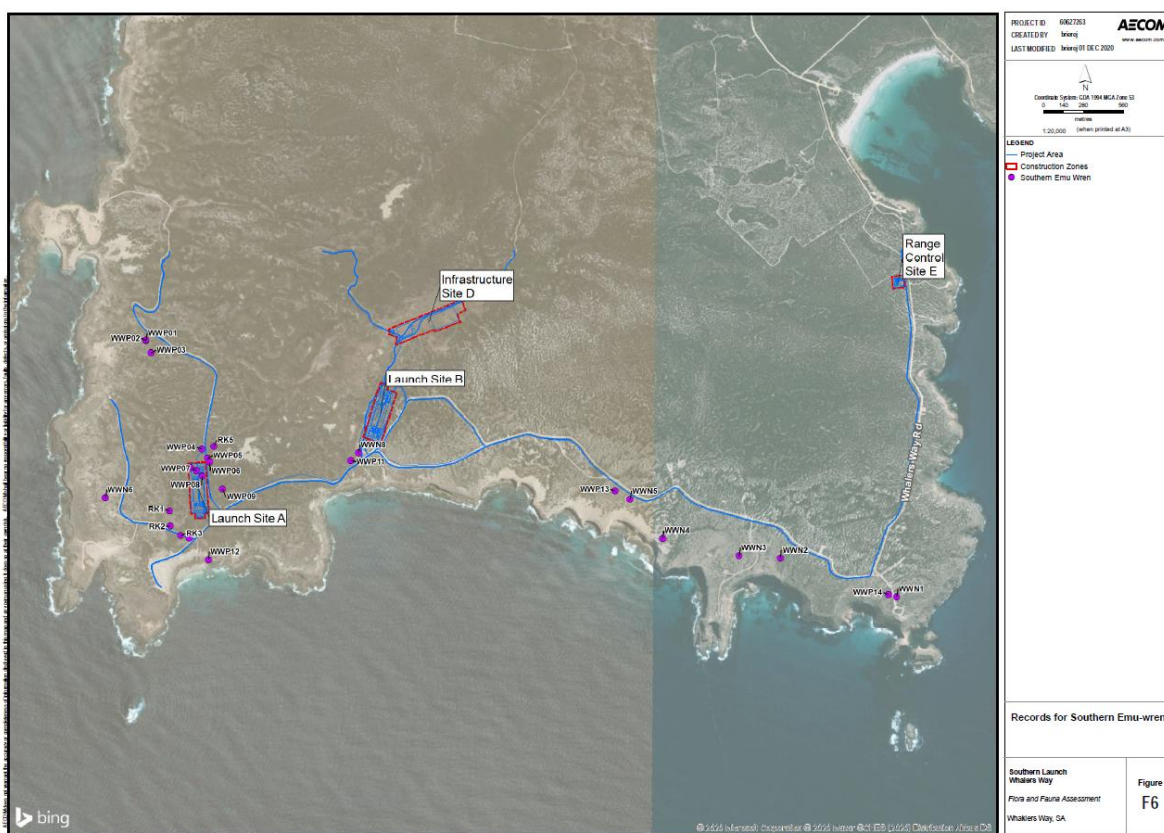
The draft listing advice acknowledges the threat posed to the subspecies from a proposed space launch facility at Whalers Way, within the habitat of this subspecies, for impacts related to 'land clearance' and 'anthropogenic disturbance'.

The proposed facility will also increase bushfire risk. As stated in the draft listing advice, fire is a key threat to the subspecies with bushfires in 2005 leading to the local extinction of the Koppio Hills subspecies and a fire in December last year (2021) impacting the 'South Block' population to an unconfirmed extent.

The increased threat posed by fire to the subspecies from this proposed development should therefore also be reflected in the 'Inappropriate fire regime' section of the table of threats in the draft listing advice.



Smoke from a fire that resulted following a failed 'test' launch attempt from a 'temporary' rocket launch pad at Whalers Way in September 2021, resulting burnt vegetation.



The proposed locations of two permanent rocket launch pads and associated infrastructure (red rectangles) relative to known southern emu-wren records at Whalers Way (purple dots). Note that Launch Site A is proposed for the part of Whalers Way that is a 'hotspot' for the subspecies (source: Terrestrial Biodiversity Technical Report for the Whalers Way Orbital Complex).

The proposed Whalers Way space launch facility is the subject of referral 2021/9013 under the EPBC Act, currently being considered by your Department.

The NCSSA concurs with the draft listing advice that all known sites are 'habitat critical to the survival of the species' and that 'further loss of connectivity between suitable habitat patches, or fragmentation of habitat patches, would lead to further fragmentation of the population and increase risk of extinction of isolated subpopulations.'

The proposed space launch facility should therefore be refused since it will have a significant negative impact on the subspecies through clearance and degradation of habitat critical to its survival, increasing the risk of extinction, including through increased bushfire risk.

Recovery Plan decision

The NCSSA supports a Recovery Plan being developed and implemented for this subspecies, noting that there are draft Recovery Plans for this subspecies that have never been finalised and adopted under the EPBC Act that would provide a strong starting point.

Conclusion

The transfer of this subspecies from 'vulnerable' to 'endangered' is a recognition that it is sliding closer toward extinction. The Mallee Emu-wren was wiped out in South Australia by fire in 2014 and is now subject to a costly reintroduction program. Acting now to protect the Eyre Peninsula southern emu-wren before it slides even closer towards extinction, particularly by refusing any actions that will directly result in habitat destruction such as the proposed Whalers Way space launch facility, is critical if Australia's international commitments to protect biodiversity, as enshrined in the EPBC Act, are to be achieved.

If you would like to clarify or discuss this submission please contact me at 0400 277 423 or via email at julia.peacock@ncssa.asn.au.

Yours sincerely,

A handwritten signature in blue ink that reads "Julia Peacock". The signature is written in a cursive style and is placed on a light yellow rectangular background.

Julia Peacock
Nature Advocate