

# Submission: Guidance for reporting detections of Greater Gliders

By Kinglake Friends of the Forest



Submission date: 7/7/2021

Contact: Kinglakefriendsoftheforests@gmail.com

## **Clarity of guidelines**

The survey requirements need to be consolidated in one document rather than spread across three locations: the Guidance Note, the Forest Reports website and the Forest Protection Survey Program's survey guideline. The dispersal of guidelines is confusing and discourages engagement from members of the community.

The Guidance Note quotes the Greater Glider Action Statement as follows:

*This prescription states that if "a density of Greater Gliders equal to or greater than five individuals per spotlight kilometre (or equivalent measure) is identified", then retention of "at least 40% of the basal area of eucalypts across each timber harvesting coupe, prioritising live, hollow bearing trees" is required.*

This needs to be updated in accordance with the OCR's Precautionary measures in timber harvesting post the 2019/20 Victorian bushfires - Regulatory Position Statement, May 2020. On page 2, the document states:

*The Conservation Regulator believes that the precautionary principle is currently triggered by risks of serious and irreversible damage to Victoria's biodiversity posed by timber harvesting operations in light of the 2019/20 Victorian bushfires, and the significant scientific uncertainty about the status of Victoria's biodiversity from these operations in this context. The Conservation Regulator believes that VicForests is therefore required by law to implement precautionary measures in response.*

Then, on page 14, under the heading of "Examples of Precautionary Measure", the document states:

*Retain at least 40% of the basal area of eucalypts across each timber harvesting coupe, prioritising live, hollow-bearing trees, wherever a density of 3 or more Greater Gliders or 3 or more Yellow-bellied Gliders per spotlight kilometre (or equivalent measure) is found.*

This measure is also referred to in the Hugh Brennan affidavit in the Supreme Court of Victoria at Melbourne, Common Law Division Valuation, Compensation and Planning List S ECI S ECI 2020 00373 between WOTCH INC Plaintiff and VICFORESTS Date of document: 3 September 2020:

*The Greater Glider Conservation Strategy provides, among other things, that wherever a density of Greater Gliders equal to or greater than **three individuals per spotlight kilometre** is identified, VicForests must retain at least 40% of the basal area of eucalypts across the coupe, with live, hollow bearing trees being prioritised.”*

Of course, guidelines are functionally useless without mechanisms of accountability. To this end VicForests must be required to survey and publish the location of all “live, hollow bearing trees” before logging to ensure that the retention of these trees is prioritised.

### **Notes and concerns regarding survey requirements**

#### **Basic methodology**

*“Spotlighting surveys should be undertaken by two surveyors on foot (at an average pace of 10 minutes per 100 metres) and cover a total distance of as close to one kilometre as possible per transect.”*

No justification is offered for the requirement for two surveyors, and it is very difficult to reason why this should be the case. Provided that the time, date, location and evidence are recorded accurately, the number of surveyors is irrelevant to the validity of the report. However, it is reasonable to *recommend* (but not mandate) that community surveyors have company in the bush at night.

If the purpose of these surveys is to ascertain whether there are significant populations of Greater Gliders, **there should be no minimum or maximum transect length**. Surveyors should be allowed to stop surveying once the threshold number of gliders is reached, or continue surveying as required to ensure detection of animals present in the coupe.

As regards speed over the ground, the prescription of 10 minutes per 100 metres is unjustified. The number of Gliders detected in a transect will depend on the number of Gliders present, the nature of the vegetation and the observational aptitude of surveyors. The two studies which informed the Action Statement ( [ARI](#) ) and ([Kavanagh](#)) were both carried out in relatively open, drier forest of mixed species with lower average height of canopy trees and density of undergrowth than many areas of the Central Highlands. The new guide does not allow for differences in vegetation type. Assuming that excluding most mountain Ash and Alpine Ash areas this is not the intent of the guide, these limits should be removed.

#### **Transect length and shape (both prescriptions)**

The survey transect is often poorly represented by the track log. When standing still resting or trying to film a Glider, a GPS will appear to roam as it acquires the surveyors' locations, adding spurious distance to the track log. In addition, community surveyors rarely have the luxury of plotting their transect during daylight, and therefore all sorts of obstacles (vegetation and terrain) have to be negotiated in the midst of surveying, adding unrepresentative distance to the track log.

Additionally, one of the two research papers, which DELWP has confirmed were used to inform the action statement ([Kavanagh](#)), specifically mentions that while spotlighting along the previously marked 1 km transects: *"counts were made at a slow walk (about 10 m/minute) with frequent circling to ensure that trees near the transect line were surveyed on both sides."*

Therefore, treating the actual track taken by the surveyor as the transect length would clearly be inconsistent with the research used to inform the Action Statement.

NB. For multiple transects, there should not be a maximum separation of 250 metres. There is no basis for this arbitrary limit.

### **Transect length and shape (Action Statement only)**

The limit to detections within 100m of the coupe boundary is unjustified. This limit is not mentioned in the Action Statement prescription and makes no sense if the purpose is to preserve the habitat of known Greater Glider populations. Arbitrary coupe boundaries should not divide populations.

### **Transparency and community trust**

Groups and individuals who are making the effort to do surveys are entitled to transparency when it comes to communication between the OCR and VicForests. The Guidance Note states that: "As soon as the Conservation Regulator receives a Forest Report where a prescription might apply, VicForests is notified and ceases harvesting until the detection can be verified". Surveyors should be bcc'd when the OCR notifies VicForests of detections in order to build community trust.

The Guidance Note also states that: "While the Action Statement prescription is not yet formally part of the regulatory framework (in law), the Conservation Regulator will monitor and report on compliance with these measures across Victoria until Code amendments are made." Once again, in the interests of transparency, community surveyors would appreciate being notified of these reports and to whom they are made.

As mentioned above, VicForests must be required to survey and publish the location of all "live, hollow bearing trees" before logging to ensure that the retention of these trees is prioritised, as required by the Guidance Note and the Greater Glider Action Statement.