



31 March 2021

Committee Secretary  
Joint Standing Committee on the National Capital and External Territories  
PO Box 6021  
Canberra ACT 2600

By email only to [jscncet@aph.gov.au](mailto:jscncet@aph.gov.au)

**Submission to the inquiry into economic, social and environmental sustainability in the Indian Ocean Territories (the Inquiry).**

Dear Committee,

Thank you for the opportunity to comment on the inquiry into economic, social and environmental sustainability in the Indian Ocean Territories (IOT). We believe the region's exceptional natural beauty and unique biodiversity is central to the IOT's ability to support thriving communities into the future. This includes sustaining the basic needs of life which depend on functioning ecosystems and extends to ongoing economic opportunities in nature tourism. We are concerned that currently safeguarding the IOT's most valuable assets do not receive the attention they deserve and do not lead the vision for the region's future.

BirdLife Australia is an independent non-partisan grassroots charity with over 200,000 supporters throughout Australia. Our primary objective is to conserve and protect Australia's native birds and their habitat. Our organisation is the national partner of BirdLife International, the world's largest conservation partnership, with over 13 million combined supporters.

BirdLife Australia has played a major role in the conservation and monitoring of Australia's bird life throughout our almost 120-year history. We have invested in long-term threatened bird conservation programs, often in partnership with other organisations and communities, bringing together research, education, on-ground remediation, advocacy and campaigning. The organisation relies on thousands of volunteers and citizen scientists who play a key role in delivering our bird conservation programs.

Our core programs adopt a long-term, multi-species and landscape scale approach to conservation for Coastal Birds, Woodland Birds, Mallee Birds and others. Our Key Biodiversity Areas program does the same for sites of recognised global importance for birds and biodiversity more broadly. Our Preventing Extinctions program focuses on threatened birds that are most likely to become extinct and require leadership from BirdLife Australia.

BirdLife recognises the economic and human dimensions of ending mining on Christmas Island (the Island), and strongly supports the move to a sustainable economic future. It is vitally important for both the community and the environment, that we transition away from a dependency on mining toward sustainable ecotourism opportunities.

Successful ecotourism and conservation of the Island's endemic wildlife is incompatible with the expansion of phosphate mining.

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Should you have any questions or require more information please contact [REDACTED]  
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Kind regards,



Dr. Golo Maurer  
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## Submission

This submission focusses on Terms of Reference A, D and E and specifically on Christmas Island.

### About the unique ecology and bird life of Christmas Island.

Christmas Island is home to an exceptional 254 wildlife taxa found nowhere else in the world and is internationally recognised as a Key Biodiversity Area critical for conserving life on earth. The Island also has 23 resident or breeding bird species and is the last remaining stronghold for two of the world's rarest seabirds – the Abbott's Booby (Endangered EPBC Act 1999) and Christmas Island Frigatebird (Critically Endangered EPBC Act 1999).

Sadly, the Island is also an extinction hotspot contributing more than its fair share to Australia's woeful record on this front with 80% of its mammal and reptile species declared extinct over the past 200 years. In 2009, the demise of the Christmas Island Pipistrelle was one of the world's most well-documented extinctions. Earlier this year the Australian Government confirmed the extinction of the Christmas Island Forest Skink, common and widespread only 25 years ago. It is estimated that an additional 50 invertebrate species, that have not been recorded for more than a century, are likely to be extinct.

Clearing of forests for phosphate mining, and the associated impacts of invasive species exacerbated as a result, are the greatest threats to the Island's unique biodiversity. Over 25% of the Island has already been cleared due to mining operations. Many of the Island's endemic species occur partly or wholly in areas potentially open to mining, including the Abbott's Booby and Christmas Island Frigatebird. Due to the already small population size and low breeding success rates of these threatened birds, a loss of just one breeding pair would be significant.

The Conservation Advice for the Abbott's Booby states **vegetation clearing and its long-term effect as the number one threat to the species**. At least 30% of the Abbott's Booby historical nesting sites on the island have been cleared due to mining and boobies are currently only able to use just 25 square kilometres of primary forest to breed.

The Australian Government's own Draft Christmas Island Biodiversity Conservation Plan (not yet finalised since 2014!) states that "further removal of previously uncleared rainforest would potentially threaten these and other species, in particular Abbott's Booby and the Christmas Island Frigatebird, through direct impacts and/or by reducing the area of their critical habitat."

A 2012 Island wide survey showed Abbott's Booby have begun to occupy areas outside of the National Park, including the eastern third of the Island<sup>1</sup>, indicating the importance of rainforest habitat without formal protections.

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<sup>1</sup> Boland et al. (2012). An island-wide survey of Abbott's Booby occupancy on Christmas Island, Indian Ocean. *Marine Ornithology* 40, 99–103.





In 2010, an independent panel of experts commissioned by the Australian Government<sup>2</sup> warned that a 'business as usual' approach will mean that management will fail and the extraordinary national asset that is the Island's biodiversity will be replaced by a combination of many introduced and a few resilient native species. That outcome would be a failure in biodiversity conservation and would compromise the potentially secure economic future for the Island as a tourist venue'.

### **Christmas Island Strategic Assessment**

Due to the history of past clearance and to protect the Island's unique biodiversity, a moratorium on the clearing of primary rainforests was declared by the Hawke Government in 1988 and affirmed subsequently by Liberal and Labor governments. Nonetheless, there have since been multiple attempts to expand mining on the Island with the most recent in 2018, an exploration proposal into previously untouched rainforest and within threatened bird habitat. In response, over 50,000 people signed our petition to safeguard the Island's unique environment and bird species, resulting in the then Minister for the Environment rejecting the proposal due to the likely impacts on the Island's unique biodiversity.

Over thirty years since the Hawke moratorium and after the rejection of successive clearing applications, the greatest recognised threat to the Island's biodiversity, expansion of phosphate mining is again on the rise. Currently, the Commonwealth is engaged in the Christmas Island Strategic Assessment (the Assessment) whose Terms of Reference list phosphate mining as a potential development activity. Apart from the impact of this decision on nature, a focus on phosphate mining is highly questionable economically. Phosphate commodity prices vary greatly, and the phosphate mined on the Island is low grade, limiting the potential markets and profit margins. In addition, developments in mining efficiency and automation are likely to lead to continued decline in the number of islanders employed in mining. Instead of locking in the Island's economic dependency on uncertain phosphate mining for the next 30-50 years, the Assessment must be a framework to transition to a sustainable economy, including the ecotourism opportunities the Island's unique environment presents. An Assessment that prioritises eco-tourism coupled with a Federally supported World Heritage nomination can be the catalyst that sparks a nature tourism boom to the Island.

### **An eco-tourism future for a World Heritage Area**

As described in the introduction above the Island is blessed with a unique and stunning combination of natural assets that have earned it the title "Galapagos of the Indian Ocean" and provide a solid foundation for sustainable eco-tourism. It is well worth noting in this context that nature tourism made the Galapagos one of the economic powerhouses of Ecuador to the point where the government needed to place restrictions on internal economic migration to the islands. With BirdLife Australia's national and international network, and our scientific expertise, we believe we can play a part in both the promotional and technical aspects of a transition of the Island's economy to benefit from the national and global growth industry of eco-tourism.

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<sup>2</sup> Final report. Christmas Island Expert Working Group. <https://www.environment.gov.au/resource/final-report-christmas-island-expert-working-group>





There have been numerous studies on the economic and conservation benefits of eco-tourism opportunities<sup>345</sup> and with appropriate investment and promotion Christmas Island could be the next great eco-tourism destination for domestic and international travellers.

Avi-tourism, where tourists' travel is focused around birdwatching, is one of the fastest growing outdoor recreation activities and sub-sectors of eco-tourism<sup>6</sup> and if properly managed is unlikely to result in negative environmental impacts. Costa Rica is the gold standard for eco-tourism/avi-tourism with about US\$400 million spent by American visitors alone on birdwatching activities annually<sup>7</sup>. Previous studies have estimated that as much as 41% of the entire tourist economy comes from birdwatching<sup>8</sup>. Another study<sup>9</sup> by Eubanks et al. 2004 found that "birdwatchers are relatively affluent tourists, sometimes with little time, hence are likely to spend more money in this niche context, over a relatively short time."

Christmas Island, and to a lesser extent Cocos (Keeling) Islands, despite the current obstacles caused by the lack of tourism infrastructure is already a must-see destination in the bird watching community, especially during the Christmas Island Bird N' Nature week. A survey of the Australian birding community we conducted in 2018, demonstrates the Island's appeal with over 70% of 712 respondents indicating a desire to visit and an expectation to pay \$4,000 per trip. Among those who had visited Christmas Island, 67% regarded it as one of their top five favourite destinations. Over 97% of all participants said that they would be willing to pay extra on their trip if it contributed to bird conservation. However, 84% of respondents cited mining as one of the reasons preventing them from visiting or returning.

This demand, which is echoed outside the birding community has only grown since the Assessment was started as Covid-19 has spurred on Australians to visit new destination in their own country. With targeted investment in small business and infrastructure, and the establishment of regular domestic flights, Christmas Island could become an eco-tourist mecca—providing for the Island's economic future while protecting its incredible living heritage.

There is a tested and successful mechanism to achieve this with the engagement of the community. As with Ningaloo, the Great Barrier Reef or the Wet Tropics a World Heritage bid can put Christmas Island firmly on the map for national and international travellers. The good news is that, despite the tragic and avoidable extinctions of some mammals and reptiles Christmas Island is still likely to gain World Heritage status in

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<sup>3</sup> Jackson, S. (2007). Attitudes towards the environment and ecotourism of stakeholders in the UK tourism industry with particular reference to ornithological tour operators. *Journal of Ecotourism*6(1), 34-66

<sup>4</sup> Hvenegaard, G.T. & Dearden, P. (1998a). Ecotourism versus tourism in a Thai national park. *Annals of Tourism Research*25, 700-720.

<sup>5</sup> O'Connor, S., Campbell, R., Cortez, H., & Knowles, T. (2009). *Whale Watching Worldwide: tourism numbers, expenditures and expanding economic benefits*. International Fund for Animal Welfare. Yarmouth: Economists at Large.

<sup>6</sup> Callaghan et al. (2018). Travelling birds generate eco-travellers: The economic potential of vagrant birdwatching. *Human Dimensions of Wildlife*. 23. 71-82. 10.1080/10871209.2017.1392654.

<sup>7</sup> Scott, D. & Thigpen, J. (2003). Understanding the birder as a tourist: Segmenting visitors to the Texas Hummer/Bird Celebration. *Human Dimensions of Wildlife*8, 199-218.

<sup>8</sup> Şekercioğlu, Ç. (2002). Impacts of birdwatching on human and avian communities. *Environmental Conservation*29(3), 282-289.

<sup>9</sup> Eubanks et al. (2004). Understanding the diversity of eight birder sub-populations: socio-demographic characteristics, motivations, expenditures and net benefits", *Journal of Ecotourism*3, pp. 151 -172.



a canter. What this need is a Federal Government supported and funded bid for World Heritage status and a vision that would help expedite a transition to an eco-tourism-based economy.

**Recommendations:**

**BirdLife Australia recommends that the Australian Government:**

- Support and resource the preparation and development of a UNESCO World Heritage bid for Christmas Island.
- Rule out new mining activities on Christmas Island, including rejecting mining as an “approved action” under the Christmas Island Strategic Assessment currently in development.
- Use the reworking of existing stockpiles to facilitate a just transition away from mining. This would not apply to stockpiles that have recovered substantial native vegetation or where their reworking would put Abbott’s Booby nests or other threatened species at risk.
- Exclude any known, historic or potential nesting trees (with an appropriate buffer) for Christmas Island Frigatebird and Abbott’s Booby from any potential land release as part of the Christmas Island Strategic Assessment currently in development.
- Declare all known and historic nesting trees, including an appropriate buffer, for Christmas Island Frigatebird and Abbott’s Booby as critical habitat and designate them on the national critical habitat register.
- Commission a Federally funded action plan for high-end sustainable eco-tourism for the Island.
- Support more direct flights and offer subsidised fares to Christmas Island to increase domestic tourism as enjoyed by other tourist destinations hit by Covid-19.
- Invest in the Island’s tourism infrastructure and commercial opportunities.