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Committee Secretary  
Senate Standing Committees on Environment and Communications  
PO Box 6100  
Parliament House  
CANBERRA ACT 2600

**By Email:** [ec.sen@aph.gov.au](mailto:ec.sen@aph.gov.au)

31 August 2022

Dear Sir/Madam,

**RE: Humane Society International supplementary submission to the Senate inquiry into Australia's faunal extinction crisis**

Humane Society International (HSI) welcomes the opportunity to provide this supplementary submission to the Senate Standing Committees on Environment and Communications for the inquiry into Australia's faunal extinction crisis.

HSI is the world's largest conservation and animal welfare organisation with over 10 million supporters globally. We have more than 25 years' experience in Australia, working to achieve an ecologically sustainable and humane world for animals.

HSI submitted to the inquiry in September 2018. Unfortunately, the concerns we raised in that submission remain relevant today, with the recent 2021 State of the Environment Report highlighting the stark and ongoing decline in the health of our environment and Australia's faunal populations. These ongoing declines are also reflected in the work that HSI has done to protect Australia's fauna species. Since our 2018 submission to the inquiry, HSI has individually or jointly nominated a number of entities for listing or uplisting as threatened species or ecological communities under *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)*, including using the Common Assessment Method through the Queensland nomination process. This includes:

- Fire-affected Warm Temperate Rainforests of the South East Corner Bioregion;
- Araluen Scarp Grassy Forest of the South East Corner Bioregion;
- Brogo Wet Vine Forests of the South East Corner Bioregion;
- Murrumbidgee Sandstone Woodland in the Sydney Basin Bioregion;
- Wetlands and inner floodplains of the Macquarie Marshes;
- Lower Murray River and associated wetlands, floodplains and groundwater systems from the junction of the Darling River;



- Spectacled flying-fox (*Pteropus conspicillatus*);
- Platypus (*Ornithorhynchus anatinus*);
- Koala (*Phascolarctos cinereus*);
- Colclough's shark (*Brachaelurus colcloughi*);
- Sydney skate (*Dentiraja australis*);
- Greeneye spurdog (*Squalus chloroculus*);
- Eastern angelshark (*Squatina albipunctata*);
- Freshwater sawfish (*Pristis pristis*);
- Grey Skate (*Dipturus canutus*);
- Whitefin Swellshark (*Cephaloscyllium albipinnum*);
- Australian Longnose Skate (*Dentiraja confusus*);
- Narrow Sawfish (*Anoxyprisits cuspidata*);
- Mt Blackwood Leaf-tailed Gecko (*Phyllurus isis*);
- Mt Cooper Slider (*Lerista vittata*);
- Lyre-patterned Slider (*Lerista chordae*);
- Vine-thicket Fine-lined Slider (*Lerista cinerea*);
- Mt Surprise Fine-lined Slider (*Lerista storri*);
- Limbless Fine-lined Slider (*Lerista ameles*);
- Connors Range Leaf-tailed Gecko; Champion's Leaf-tailed Gecko (*Phyllurus championae*);
- Mt Elliot Leaf-tailed Gecko (*Phyllurus amnicola*);
- Chillagoe Fine-lined Slider (*Lerista parameles*);
- Leaden-bellied Fine-lined Slider (*Lerista vanderduysi*);
- Rochford Slider (*Lerista rochfordensis*);
- Hobson's Fine-lined Slider (*Lerista hobsoni*);
- Nubbined Fine-lined Slider (*Lerista colliveri*); and
- Bulleringa Fine-lined Slider (*Lerista alia*).

A number of these entities have been listed or uplisted, but many remain under consideration and therefore do not have the conservation benefits associated with being a listed entity.

Also since 2018, HSI has produced a number of reports and submissions that are relevant to the Terms of Reference for the inquiry. We provide a brief summary and link to each relevant report below.

*Analysing the Wildlife Toll of Prescribed Burning Practices in Southwest WA - Impacts of Prescribed Burning on Fauna and Their Habitats*<sup>1</sup> August 2022

This recently released report seeks to understand the impacts the Western Australian (WA) prescribed burning regime is having on wildlife and their habitats, and identify opportunities for improvement. In one of its key conclusions, the report found that "(t)he undeniable conclusion of this report is that we do not understand the degree to which prescribed burning is impacting biodiversity and natural environments, but we can see prescribed burning is unequivocally resulting in reductions to biodiversity values". A recommendation of the report was the WA

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<sup>1</sup> Available at: [https://hsi.org.au/wp-content/uploads/2021/10/HSI-WA-Bushfire-Report-2022\\_WEB-1.pdf](https://hsi.org.au/wp-content/uploads/2021/10/HSI-WA-Bushfire-Report-2022_WEB-1.pdf)

Government work with the Federal Government to develop a national Threat Abatement Plan for the Key Threatening Process *Fire regimes that cause declines in biodiversity*.

Disappointingly in July 2022, the Federal Minister for the Environment found that "(p)reparation of a threat abatement plan is not the most effective or efficient way to complement and coordinate these efforts of governments, land managers, knowledge experts, and First Nations people and communities, who are working hard to improve fire planning, management and recovery."<sup>2</sup> Failure to fully utilise the tools available under the EPBC Act is of ongoing concern to HSI.

*Submission on Proposed Changes to Conservation Planning Decisions* (attached) November 2021  
HSI made this submission in relation to the then Department of Agriculture, Environment and Water proposals to remove the statutory requirement for recovery plans to be developed for 185 threatened species and ecological communities that are each Matters of National Environmental Significance listed on the EPBC Act. HSI's strong view was that this was an inappropriate response to the current extinction crisis. HSI is extremely disappointed that subsequently the then Federal Minister for the Environment, Sussan Ley decided to remove the statutory requirement for recovery plans to be developed for 176 of these entities.

Threatened ecological communities were disproportionately affected by the decisions not to require the development of recovery plans. This is particularly concerning given that the protection and management of threatened ecological communities can also be a cost effective and strategic way to conserve the habitat of multiple species, including threatened species, in the landscape. While such an approach can be challenging given the potentially large numbers of private landholders involved, this landscape scale management will be required if threatened species and ecological communities are to be recovered. These types of challenges should be not be considered a barrier to the use of this essential conservation planning tool.

*Review of the Non-Detriment Finding for CITES Appendix II listed Hammerhead Shark Species*<sup>3</sup> February 2021

On 14 September 2014, the listing of the scalloped, great and smooth hammerhead sharks on the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) Appendix II took effect. The ability for Australia to continue to export the three listed hammerhead shark species was made possible through a positive "non-detriment finding" (NDF) made by Australia. This NDF relied on the implementation of defined management measures enacted as conditions in relevant Wildlife Trade Operation authorisations. A 2020 review of the conditions found that the conditions have not been met and recommended an immediate review of the NDF. To our knowledge, to date, no further action has been taken and HSI remains concerned that inadequate monitoring and review of management measures means that commitments to protect and recover threatened species are not being delivered.

*Safeguarding Australia's Wildlife - Lessons from the 2019-20 'Black Summer' Bushfires*<sup>4</sup> October 2020  
Following the Black Summer bushfires, HSI commissioned BG Economics to undertake a qualitative study into the rescue and care of wildlife by organisations and individuals during the

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<sup>2</sup> A record of the decision is available at:

<https://www.dcceew.gov.au/environment/biodiversity/threatened/key-threatening-processes/fire-regimes-that-cause-declines-in-biodiversity#:~:text=Executive%20summary,of%20species%20or%20ecological%20communities.>

<sup>3</sup> Available at: [https://hsi.org.au/wp-](https://hsi.org.au/wp-content/uploads/2022/01/Hammerhead_NDF_Review_Report_McCrea_2021.pdf)

[content/uploads/2022/01/Hammerhead\\_NDF\\_Review\\_Report\\_McCrea\\_2021.pdf](https://hsi.org.au/wp-content/uploads/2022/01/Hammerhead_NDF_Review_Report_McCrea_2021.pdf)

<sup>4</sup> Available at: [https://hsi.org.au/wp-content/uploads/2021/10/Safeguarding-Australias-Wildlife\\_Final-Report\\_\\_2020.pdf](https://hsi.org.au/wp-content/uploads/2021/10/Safeguarding-Australias-Wildlife_Final-Report__2020.pdf)

Black Summer bushfires. The study found that the wildlife response to the fires was largely conducted by volunteer run organisations, often without on-the-ground coordination, appropriate resourcing or equipment. Government agencies were often difficult to contact, with some participants reporting leaving messages for agency representatives and never hearing back or having to wait days or weeks for a response. The report makes 12 recommendations in the key areas of planning; training; coordination; communications; the availability and use of technologies; search and rescue; animal welfare; safety; financial resourcing; and health impacts on responders. Issues of planning, coordination and resourcing are of particular relevance to this inquiry.

*Review of Recovery Planning for Threatened Sharks: Status, Analysis & Future Directions*<sup>5</sup> December 2019

This report, commissioned by HSI and the Australian Marine Conservation Society, found that “Since recovery plans, conservation advice and management strategies have been implemented for shark and ray species listed as threatened under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) there have been no measurable improvements in their status”. The report made 21 recommendations to improve recovery planning generally and for shark species specifically. This report details the inadequacy of the responses to the listing of these species and the need to ensure that proposed management solutions (and the expenditure that goes with them) must be shown to have a high chance of success and their success or failure must be measurable.

HSI would like to thank the Committee for the opportunity to present these further views. Please note HSI's change of contact details and forward any correspondence in relation to these submissions by email to [mkessler@hsi.org.au](mailto:mkessler@hsi.org.au) or I can be contacted on (02) 9973 1728.

Yours sincerely,

*Megan Kessler*

Dr Megan Kessler  
Nature Campaigner  
Humane Society International

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<sup>5</sup> Available at: [https://hsi.org.au/wp-content/uploads/2022/01/Review\\_of\\_shark\\_recovery\\_plans\\_FINAL.pdf](https://hsi.org.au/wp-content/uploads/2022/01/Review_of_shark_recovery_plans_FINAL.pdf)