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Conservation Alliance

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Protected Species and Communities Branch
Biodiversity Conservation Division
Department of Climate Change, Energy, the Environment and Water
Canberra ACT 2601
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18 September 2026

RE: Submission on the Draft National Recovery Plan for the South-eastern Red-tailed Black Cockatoo *Calyptorhynchus banksii graptogyne*

The Australian Land Conservation Alliance (ALCA) welcomes the opportunity to provide a submission on the draft National Recovery plan for the South-eastern Red-tailed Black Cockatoo (SERTBC).

ALCA represents organisations that work to conserve, steward, and restore nature on privately managed land. The conservation efforts of our 23 member organisations have influenced over 9.3% of Australia with more than 4,000 landholders; we have over 70,000 supporters and our combined annual turnover exceeds $400 million.

Together, ALCA and our members address the most pressing conservation issues across the country, by restoring endangered ecosystems, building the protected area estate, tackling invasive species, expanding private conservation finance, and deploying nature-based solutions to mitigate climate change.

Commentary on the Draft Plan

ALCA commends the Department's work in reviewing and re-drafting the National Recovery Plan for the South-eastern Red-tailed Black Cockatoo (the Draft Plan) and strongly supports the Draft Plan's ambitious yet achievable vision.

It is appropriate that the Draft Plan highlights the importance of private land conservation in protecting, managing and improving critical habitat for South-eastern Red-tailed Black Cockatoo (SERTBC). ALCA is committed to strengthening landscape connectivity, particularly in regions dominated by private land tenure, including within the SERTBC range in south-western Victoria and south-eastern South Australia. Our member organisations can play a key role in undertaking actions to support the recovery of SERTBC; including targeted, cross-tenure conservation planning, implementation, population monitoring and measuring the effectiveness of conservation actions.

The Draft Plan would be strengthened by:

1. **A clear statement regarding unacceptable impacts.**

ALCA welcomes the clear descriptions of habitat critical to survival (critical habitat) in the Draft Plan. However, to reverse this species' current trajectory, governments, decision makers and land managers require objective, unambiguous guidance on what is likely to constitute unacceptable impacts to the species and its habitat. The Plan should make it clear that unacceptable impacts include any action that destroys, degrades or modifies habitat critical to survival. For SERTBC this would include actions, such as planned burning, that result in more than 15% of feed tree canopy being scorched (assessed as a rolling 10-year average). Furthermore, on page 14 habitat critical to survival is clearly described but unambiguous statements are needed to prescribe protection. In the second paragraph of Section 2.7 (page 14) the phrase 'and must be conserved' should be added to the end of the sentence so that it reads:

> "Because the birds are very mobile and move throughout the range to exploit the most efficient feeding opportunities as they vary over time, all current feeding habitat within the subspecies range is habitat critical to survival **and must be conserved**."

Similarly, again on page 14 paragraph 4 the Draft Plan states, 'This habitat type is critical for the subspecies survival and protection should be prioritised'. We recommend that the sentence is changed to 'This habitat type is critical for the subspecies survival and *must be protected*'.

2. **A commitment to fund recovery actions.**

To the extent to which it is practicable to do so, recovery plans must state the estimated duration and cost of the recovery process (Section 270 (2)(f) of the *Environment Protection and Biodiversity Conservation Act 1999*). The Plan should therefore provide an estimate of the cost of taking action to deliver its objectives**.** The Plan should also detail the Australian Government's commitment to implementation of the Plan, and how it will contribute to meeting Australia's obligations under international agreements as per S270(3)(d) of the EPBC Act. Recovery actions for the SERTBC can make an important contribution towards Australia's commitment to the Kunming-Montreal Global Biodiversity Framework's Goals and Targets. In particular, to halt the extinction of known threatened species and significantly reducing extinction risk (Goal A), and to maximise the contribution of private land conservation to Australia's commitment to protect areas of particular importance for biodiversity (Target 3).

Thank you again for the opportunity to submit to the consultation on the Draft National Recovery Plan for the South-eastern Red-tailed Black Cockatoo.

Australian Land Conservation Alliance

About the Australian Land Conservation Alliance

The Australian Land Conservation Alliance is the peak national body representing organisations that work to conserve, manage, and restore nature on privately managed land. We represent our members and supporters to grow the impact, capacity, and influence of private land conservation to achieve a healthy and resilient Australia.

Our twenty-three member organisations are:

- Arid Recovery
- Australian Wildlife Conservancy
- Biodiversity Conservation Trust NSW
- Biodiversity Legacy
- Bush Heritage Australia
- EcoGipps
- GreenCollar
- Greening Australia
- Landcare Australia
- Nari Nari Tribal Council
- National Landcare Network
- Nature Foundation
- North Australian Indigenous Land and Sea Management Alliance
- NRM Regions Australia
- Odonata
- Queensland Trust for Nature
- Rainforest Rescue
- South Endeavour Trust
- Tasmanian Land Conservancy
- The Nature Conservancy Australia
- Trust for Nature (Victoria)
- World Wildlife Fund – Australia
- Wildlife Bank Trust

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Together, ALCA and our members address the most pressing conservation issues across the country, by restoring endangered ecosystems, building the protected area estate, tackling invasive species, expanding private conservation finance, and deploying nature-based solutions to mitigate climate change.

Through their active land management, ALCA member organisations are deeply embedded in rural communities and economies, providing jobs, securing significant regional investment, and safeguarding remaining native habitat, with its many positive spillover effects for community, wellbeing, and food security. We seek to demonstrate the role and value of private land conservation as a cornerstone of the Australian economy.

Some ALCA members are statutory entities; the views expressed in this submission do not necessarily represent the views of the Government administering those statutory entities.