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Submission on the draft National Recovery Plan for Greater Gliders

Environmental Advocacy in Central Queensland (**EnvA**) appreciates the opportunity to make a submission on the draft National Recovery Plan for greater gliders (**draft recovery plan**).

About Environmental Advocacy in Central Queensland

EnvA is a Central Queensland community organisation committed to ensuring that all land use is sustainable and does not significantly impact on the environment. We have a particular focus on the environmental impacts of new and expanding coal mining and coal seam gas projects in Central Queensland, including habitat loss and fragmentation, impacts on water quality, and the significant greenhouse gas emissions that contribute to accelerating climate change.

EnvA's comments on the draft recovery plan are informed by our experience advocating for the protection of greater glider habitat from new and expanding fossil fuel developments in Central Queensland. Coal and gas projects frequently result in the clearing and fragmentation of important greater glider habitat and contribute substantially to climate change, compounding existing threats to the species. Habitat loss and fragmentation, combined with the increasing frequency and severity of climate change–driven heatwaves, fires and storms, present an acute risk to greater gliders and other threatened species in the northern Brigalow region. These threats are clearly identified in the draft recovery plan.

Our submission and recommendations

General comments

The following comments provide context for EnvA's recommendations on the draft strategies and actions.

Treatment of energy developments

Energy developments are treated inconsistently across different sections of the draft recovery plan.

For example:

- The Executive Summary identifies the main drivers of population decline as fire events, primary industry, climate change, and energy development,
- The Recovery Plan Overview (s 1.2) groups renewable and fossil fuel energy development together, and
- The Threats and Impacts section (s 4) and the Habitat Loss and Fragmentation section (s 4.1) distinguishes resource extraction and renewable energy.

While EnvA acknowledges that all forms of energy development have the potential to impact greater glider populations, fossil fuel developments and renewable energy developments are fundamentally different in scale, duration, and risk profile. Fossil fuel projects typically involve extensive land clearing, long-term or permanent loss of habitat and connectivity, and significant greenhouse gas emissions that exacerbate climate change impacts. Coal projects in particular frequently involve the permanent destruction of critical linkage habitat, including riparian corridors that provide essential movement pathways and refuge habitat for greater gliders.

EnvA therefore recommends that fossil fuel developments and renewable energy developments be clearly and consistently separated throughout the recovery plan, with distinct threat characterisations, strategies and actions developed for each.

This distinction is consistent with recent reforms to the *Environment Protection and Biodiversity Conservation Act 1999* (**EPBC Act**), under which fossil fuel projects are excluded from streamlined assessment pathways, including:

- assessment through preliminary documentation;
- assessment through the bioregional planning pathway; and
- identification as projects of national interest.

Our recommendation is that the recovery plan should consistently distinguish between fossil fuel developments and renewable energy developments across all sections, with separate strategies and actions to address their differing impacts on greater gliders.

Habitat requirements

There remains a significant information gap in published research on greater glider populations occupying inland, lower-elevation areas within the known distribution of the species, particularly within the coal basins of Queensland and New South Wales.

The draft recovery plan notes that greater gliders are generally recorded in higher-elevation forests and wetter sites with fertile soils. It also suggests that these apparent preferences may reflect research bias rather than true absence, and that cooler environments may be critical given the species' low thermal tolerance and potential range shifts to higher elevations (section 4.4).

Ecological surveys undertaken for new and expanding coal and gas projects in the northern Bowen Basin consistently identify the presence of greater gliders in lower-elevation inland habitats. Over the past three years, at least 19 coal and gas projects proposed or assessed in the northern Bowen Basin would directly impact more than 3,000 hectares of greater glider habitat, within a landscape that is already highly disturbed and fragmented (see Table 1).

EnvA concurs with the findings of Norman and Mackey (2023)[1] that it is critical for government agencies and land managers to comprehensively assess the impacts of extractive industries on the distribution and spatial configuration of habitat resources essential for threatened species.

Temperature sensitivity and climate resilience

As identified in the draft recovery plan, greater gliders are particularly susceptible to heat stress, dehydration and starvation under the following conditions:

- sustained high temperatures, particularly where diurnal temperatures remain elevated for several consecutive days and nocturnal temperatures exceed 20°C;
- high humidity and low wind conditions that limit evaporative cooling;
- drought or extended dry seasons that reduce leaf moisture content; and
- conditions where humidity and nocturnal temperatures prevent dew formation on foliage.

[1] Norman P and Mackey B (2023) 'Priority areas for conserving greater gliders in Queensland, Australia', *Pacific Conservation Biology*.

These conditions are frequently experienced in Central Queensland. Despite this, greater gliders continue to be detected during site inspections for proposed fossil fuel developments and through thermal drone surveys conducted by conservation organisations.

The persistence of these inland populations suggests a degree of resilience to extreme climatic conditions. These populations may therefore represent critically important conservation assets in a warming climate and should not be regarded as marginal or expendable. Their protection is likely to be essential to the long-term survival of the species across Central Queensland.

Table 1. Overview of the impact of recent fossil fuel projects on greater gliders in the northern Bowen Basin in Central Queensland

Project	Assessment status	Reference number	Habitat area impacted (ha)	Notes to explain unknown impact area
Middlemount Coal Mine Extension Project	Proposed	EPBC 2021/8920	81.7	
Moranbah North and Grosvenor Mines rail and pipeline realignment Project	Proposed	EPBC 2023/09489	4	
Isaac Downs Extension Project	Proposed	EPBC 2025/10183	?	EIS in preparation
New Lenton	Proposed	EPBC 2020/8778	293	
Gas Supply Security Project	Proposed	EPBC 2020/8856	923	
Hail Creek Open Cut extension	Proposed	A-EA-AMD-100576264	16.9	Still to be referred for EPBC assessment
Corvus Coal	Proposed	EPBC 2025/10181	?	Awaiting assessment approach
Callan Coking Coal	Proposed	EPBC 2025/10122	?	Awaiting preliminary documentation
South Walker Creek		A-EA-AMD-100729271	6.6	Not referred for EPBC assessment
Moorvale South Extension Project	Proposed	EPBC 2024/09960	62	
Peak Downs Mine Power Line Realignment Project	Proposed	EPBC 2024/09983	6.42	
Vulcan South Coal	Approved	EPBC 2023/09708	1056	
Coppabella Mine Humbug Gully Project	Proposed	EPBC 2024/09867	220	
Saraji Mine Grevillea Pit Continuation Project	Proposed	EPBC 2023/09757	?	Awaiting preliminary information documentation
Barada Barna Road Upgrade	Withdrawn	EPBC 2024/09791	13.74	
Lake Vermont Meadowbrook extension project	Proposed	EPBC 2019/8485	100.6	
Winchester South Project	Proposed	EPBC 2019/8460	132.8	
Vulcan Coal Mine Ancillary Infrastructure	Proposed	EPBC 2022/09361	?	Awaiting preliminary information documentation
Peak Downs Mine Continuation Project	Proposed	EPBC 2022/09350	?	EIS in preparation

Vision, objectives, strategies and actions

Vision

EnvA considers that the draft vision is aspirational but not operationally meaningful and is unlikely to be achieved under the currently proposed strategies and actions. The vision is weakly linked to measurable outcomes, timelines and accountability mechanisms.

If retained, the vision should be more closely aligned with the objectives and actions of the recovery plan, for example by explicitly referencing:

- delivery of recovery plan strategies within the stated timeframes;
- measurable improvement in the conservation status of the greater glider; and
- demonstrable protection and improvement of key habitat areas and connectivity corridors.

The proposed timeframe to achieve the vision is by 2050. This is inconsistent with the requirement for recovery plans to be reviewed every five years and does not facilitate meaningful progress tracking. A shorter timeframe of 10 years would be more appropriate and would better align with the 2035 timeframe referenced in the objectives.

Alternatively, EnvA considers that the vision section could be removed, with the objectives providing the primary benchmark for assessing recovery outcomes.

Objectives

EnvA supports the draft objectives but considers that the proposed strategies and actions are insufficiently prioritised and resourced to achieve them. Objective 2 — maintaining and increasing the extent, quality and connectivity of greater glider habitat — is the most critical objective for preventing further population decline.

The rapid decline of the koala from a common species to an endangered species within two decades demonstrates the consequences of delayed or inadequate habitat protection. Without strong and enforceable measures to protect habitat and connectivity, greater glider populations are likely to continue declining, potentially leading to further deterioration in conservation status.

While research and monitoring are important, they should not be prioritised over immediate protection of known habitat and extant populations.

Strategies and actions

As a general observation, there is poor alignment between priorities and timeframes across the strategies and actions outlined in section 5.3.1. For example:

- some actions scheduled for 2026–2027 are assigned a mix of Priority 1, 2 and 3 classifications; and
- several Priority 1 actions are not scheduled to commence until 2027, while lower-priority actions are scheduled to begin earlier.

This inconsistency undermines the stated urgency of recovery efforts.

We recommend that this is reviewed and priority 1 actions are all scheduled to commence in 2026.

Strategy 1. Develop a national monitoring program

EnvA supports the actions under Strategy 1, particularly the development of improved and standardised survey guidelines for proposed developments, land clearing and forestry operations.

Greater gliders are readily detectable when appropriate nocturnal survey methods are employed. EnvA recommends that thermal drone surveys undertaken by experienced operators be mandated in areas of potential greater glider habitat, rather than treated as optional or supplementary methods.

Strategy 2a. Map, assess, and monitor habitat extent and quality

EnvA supports the actions listed within Strategy 2a, but consider that a further action should be included here or in Objective 4 along the lines of:

- "Review Environmental Impact Statements and Preliminary Documentation and associated ecological reports submitted with development applications to better define the current and historical distribution and habitat of greater gliders."

It is very clear (refer Table 1) that greater gliders are regularly identified in the northern Bowen Basin, but this information is often not being documented in scientific literature. This survey work is generally undertaken by qualified consultants and provides an industry resource-funded source. The information included in these reports is not being translated into a broader understanding of greater glider habitat, cumulative impacts and conservation planning needs.

There is a lack of published information in the low-lying areas within Central Queensland where greater gliders remain viable, and this type of investigation would be useful in informing government policy. These populations may also provide a valuable genetic stock as they are exhibiting a level of climate change resistant traits given the temperature sensitivity of the species.

Strategy 2b. Increase habitat connectivity through strategic corridor planning and restoration

Actions 2.5 and 2.7 relate to the mapping and protection of habitat corridors used by greater gliders. These actions are identified as priority one actions, but not to commence until 2027.

In Queensland, there are already identified statewide biodiversity corridors[2], with additional information provided in scientific literature [eg.1]. These corridors have already been identified and must be incorporated into mechanisms for immediate protection through the development and implementation of policy.

Delaying this "priority 1" action for at least another year is not appropriate. EnvA recommends that a further action be incorporated that is based on current information along the lines of:

- Develop a policy that provides immediate protection of identified State biodiversity corridors and encourage the update of mapping to incorporate new research findings as appropriate.

Further recommendations

Offsets

The information provided in the draft recovery plan notes that:

- The time to regenerate "offset areas" is 40 years in good climatic conditions,
- Fragmentation provides multiple constraints to local populations,
- Corridors reinstatement must be of a suitable width, and
- Glider poles and nestboxes have not been proven to be effective

Protecting habitat is more crucial to prevent the conservation decline of greater gliders.

EnvA holds serious concerns about the general ineffectiveness of biodiversity offsets in Australia. Since the Queensland Environmental Offsets Policy was introduced in 2014, biodiversity indicators—including vegetation extent and condition, and populations of threatened species— have continued to decline.[3]

Even the previous Federal Environment Minister acknowledged in 2023, "We know the current offset arrangements are broken and making nature worse."[4]

EnvA recommends that biodiversity offsets not be permitted for developments affecting greater glider habitat, except where projects are demonstrably in the "national interest" under the revised EPBC Act.

[2] Queensland Government (2023) Statewide biodiversity corridors.
[3] Queensland Government (2020) State of the Environment Report – Biodiversity and Terrestrial Ecosystems
[4] The Guardian (2024) A third of land set aside for restoration in worse state than before, Australian offset audit finds

Important populations

The parameters for identifying significant populations are outlined in section 3.5.2. Action 2.3 is the only 'research-based action' that leads to the identification of important populations and is identified as a priority 2.

EnvA considers that every extant population of an endangered species constitutes an important population, particularly those persisting in climatically extreme or highly disturbed landscapes.

We note that there are no actions specific to addressing the protection of important populations. Action 2.3 only addresses the need to identify important and marginalised populations as a priority 2 action.

EnvA recommends the inclusion of a specific action requiring immediate protection and avoidance of further habitat loss for identified important and climate-resilient populations.

Conclusion

At present, the draft recovery plan places a strong focus on monitoring, research and associated partnerships with Traditional Owners and community, rather than protection of habitat and greater glider populations.

We strongly support the monitoring, research and involvement of Traditional Owners and community, but suggest that the protection of all remaining habitat and populations is paramount to the success of the recovery of the greater glider – particularly in the northern Bowen Basin area of Central Queensland.

Thank you again for the opportunity to comment on the draft recovery plan. We appreciate your attention to the matters we have raised.

Kind regards

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