

10 March 2026

Protected Species and Ecological Communities Branch
Department of Climate Change, Energy, the Environment and Water
GPO Box 3090
Canberra ACT 2601



Environment Institute
of Australia and
New Zealand Inc.

Dear Recover Plan Team,

Submission on the Draft National Recovery Plan for the Ghost Bat (*Macroderma gigas*)

About EIANZ

The Environment Institute of Australia and New Zealand (EIANZ) is a not-for-profit, multidisciplinary association of environmental practitioners across Australia and New Zealand. Our members include scientists, ecologists, planners, engineers, lawyers, economists and policy specialists, many with direct experience designing, assessing, approving, delivering, monitoring and enforcing environmental offsets under the EPBC Act. This submission reflects practitioner experience and draws on consultation across EIANZ specialist groups, including biodiversity offsets, heritage, ecology and impact assessment.

1. Overall position

EIANZ supports the development of a National Recovery Plan for the Ghost Bat (*Macroderma gigas*) and recognises the draft plan's clear identification of habitat loss, particularly the loss of natural rock shelters, as the most significant threat to the species. The draft also states that achieving the recovery objective of at least a 10% population increase over 15 years requires threat mitigation and habitat restoration, in addition to avoiding further decline. EIANZ would like to see this strengthened to be 10% population increase in each of the 6 regions in Australian and nationally. The current goal allows Ghost Bats to go extinct in a region but still achieve 'recovery', EIANZ don't support allowing for regional extinct region.

EIANZ considers the draft requires strengthening to ensure it functions as an effective statutory instrument under the EPBC Act. The draft currently relies on discretionary wording and undefined terms in ways that risk inconsistent application during recovery activities and during assessments and approvals. The recovery plan must provide clear, enforceable direction that supports decision-makers to avoid significant impacts and to condition actions consistently with recovery requirements.

There is also a focus on known areas, but a simple analysis could be a review of null observations. There have been 100's, if not 1000's, of surveys in WA to support EPBC assessment, but we only ever focus on records and not absence of records. The absence of a species in an area can assist management in the same way as presents.

The plan talks about 'Habitat critical to survival' which includes maternity roosts, permanent roosts, and regular roosts and their surrounding foraging areas. Occasional roosts and opportunistic roosts may be critical in some circumstances and may become more important as we experience climate change. These areas should be the focus of retaining existing populations. Currently, the document is not strong enough in protecting the areas it has identified as 'critical'.

2. Defining “stable natural cave” and “geologically stable”

EIANZ supports the plan's focus on protecting “geologically stable” and “natural stable caves” (as opposed to man-made caves, which are currently assessed for suitability), but notes that the draft does not define these terms even though they are central to Action 1a and compliance outcomes. Without a definition, proponents and regulators lack a consistent basis for determining what must be avoided, and conditions become difficult to enforce.

EIANZ recommends that the plan include concise definitions in the Glossary and repeat them in the section describing habitat critical to survival.

3. Significant caves must not be destroyed (mandatory non-offsetable protection)

EIANZ submits that the final plan must state unambiguously that geologically stable natural caves that function as maternity roosts, permanent roosts or regular roosts are habitat critical to survival and must not be destroyed, irreversibly modified, or rendered unsuitable for occupancy. The plan already recognises that such roosts are essential for persistence and recovery, and that natural cave shelters used for breeding and permanent roosting cannot be replaced. However, without clear set of expectations in the plan, its effectiveness is undermined.

Accordingly, the plan should expressly state that impacts involving the destruction of such caves are unacceptable and not capable of being offset, because the impacted feature is irreplaceable and because loss would materially undermine the recovery objective. The plan should also state that artificial shelters must not be treated as an “equivalent” substitute for natural caves and must not be used to justify deliberate destruction of natural rock shelters, noting the draft plan's position is that artificial shelters are not an alternative that enables the deliberate destruction of natural shelter.

4. Threat mitigation and restoration: the plan needs measurable performance standards

The draft correctly states that achieving the objective requires threat mitigation and habitat restoration. EIANZ recommends that the plan go further by specifying performance standards that make restoration and mitigation measurable and enforceable. Without minimum standards, proponents can claim compliance through activity rather than outcomes.

EIANZ recommends the plan include measurable requirements such as:

- (1) no net loss of roost function and no net loss of above-ground habitat condition within defined buffers around key roosts;
- (2) specify reductions in key mortality drivers such as fence entanglement incidents, introduced predator activity indices at roost entrances, disturbance events; and
- (3) evidence-based triggers that require additional mitigation when monitoring detects decline.

5. Population targets must represent genuine recovery, not improved detection

EIANZ supports the plan's measurable objective of a national population increase but recommends that the plan explicitly distinguish between genuine demographic recovery rather than increased detections resulting from improved survey technologies. The draft recognises that detection and monitoring methods are improving (including thermal flyout counts and genetic monitoring), which is positive, but it creates a real risk of perceived improvement (new roosts or animals recorded in new areas), rather than real population growth. This results in false perception that the species is benefiting or doing ok.

EIANZ recommends that the plan state that progress towards the objective must be assessed using methods that account for detectability and survey effort, and that reporting must separately present:

- (1) increases due to newly discovered colonies, and
- (2) increases due to demonstrated growth in known populations (for example, sustained increases in reproductive output, roost occupancy, and recruitment).

This is essential to ensure the “10% increase” represents biological recovery rather than improved census resolution.

6. Remove non-specific terms

The draft includes wording that introduces discretion, such as acting “where there is suspicion” of introduced predator impacts. EIANZ recommends removing this language. Predation risk at roost entrances is foreseeable, monitorable and manageable, and should be treated as a mandatory action requirement rather than an optional response.

EIANZ recommends that the plan require the introduction of predator monitoring at permanent and maternity roost entrances using appropriate non-intrusive methods (for example, camera traps) and require a mandatory response where cat or fox activity is recorded within defined risk zones. We know that predators (particularly cats and foxes) actively use the entrance of caves to predate on bats. Why recommend to monitor? In WA, companies will continue to monitor downward declines in population. The threat is known, so identification of these areas should require an action. EIANZ suggest that we change the recommendation to include mandatory management response and monitor the success of the response (i.e. set up Felixer Grooming Trap near cave). The plan should require reporting of predator monitoring outcomes as part of the national monitoring program and adaptive management framework.

7. Barbed wire entanglement

The draft identifies entanglement as a likely contributor to decline and recommends avoiding and removing barbed wire in high-risk areas. EIANZ supports this approach but recommends stronger obligations. The plan should require that barbed wire not be installed within high-risk buffers around roosts and regular detection areas, and that existing barbed wire be removed or modified within prioritised risk zones. Where removal cannot occur immediately, the plan should require durable visibility measures and verification monitoring to ensure entanglement risk is reduced. The plan talks about 25km for foraging from known areas. Should the plan identify these distances for mandated removal of fences, and suggest further as a preferred minimum distance?

8. Disturbance and buffers

The draft recognises disturbance from sound, vibration and light can be acute within at least 1 kilometre of a shelter. EIANZ recommends the plan specify minimum enforceable disturbance buffers for maternity and permanent roosts, including explicit restrictions on blasting, high-intensity lighting, sustained noise sources and repeated human entry during sensitive periods. The plan should also require that, where proponents propose alternative buffers, they must justify them with site-specific propagation modelling and monitoring and must adopt the more precautionary outcome where uncertainty remains.

9. Mine roosts, closure and liability

The draft notes that disused mines used as roosts are inherently unstable and at risk of collapse, and that loss of mine shelters from reworking or flooding should be avoided. EIANZ recommends expanding this into a clear management obligation: where mine closures or rehabilitation intersect with known or likely ghost bat roosts, the closure plan must be designed to prevent roost loss unless it is demonstrated that roost abandonment has occurred and that alternative secure roosting is available. The plan should require mine closure planning to consider roost microclimate, access, predator risk, and long-term stability, and should clarify that mine roost reliance increases the importance of protecting natural cave roost networks in the surrounding landscape.

10. Climate change and disease

The draft identifies climate change risks including increased intense rainfall events, flooding of shelters, higher temperatures and increased dangerous fire weather days. EIANZ recommends that the plan explicitly require climate-related monitoring and risk management at representative key roosts, including microclimate logging and identification of flood-prone roosts. The plan should

also include a biosecurity and disease risk protocol for cave visitation and monitoring activities. This is an important management inclusion because increased visitation and climatic stress can elevate disease risk even where specific pathogens are not yet established.

11. Data governance and transparency

The draft refers to sharing results among recovery partners and regulators and compiling monitoring information at least every five years with modern system monitoring data should be collected more frequently. EIANZ supports this but recommends that the plan identify a clear data custodian and minimum data standards. The plan should specify which entity is responsible for national data management, how sensitive location information is protected while still enabling regulatory use, and how data collected through EPBC approvals will be incorporated into national trend reporting. Without clear governance, data fragmentation will undermine adaptive management and cumulative impact assessment. This is critical.

There are examples where caves that are being used as reference caves for site-based distance, and there are multiple companies set up similar monitoring equipment at the same cave. No one is sharing the data, and we are all duplicating monitoring. This also causes unnecessarily stress to the bats for limited benefit.

12. Review timeframe

EIANZ recommends that the plan commit to a maximum five-year cycle for national review of monitoring outcomes and recovery settings, consistent with the draft's intention to compile national monitoring information every five years. The plan should also include decision triggers. For example, if monitoring detects sustained decline at a maternity roost, if roost abandonment is recorded, or if mortality incidents rise, the plan should require escalation of management responses and review of approval settings in the relevant region.

It is also critical that once a review has been triggered its outcomes are released within 12-months of the review being triggered. Historically it has taken too long for review to be undertaken and released to recovery partners and regulators and land user so changes could be implemented. To achieve this turn around it is critical that monitoring data is progressively obtained and curated.

13. Additional ecological and management elements

EIANZ recommends that the plan include three further ecological management elements to strengthen recovery outcomes and improve decision certainty.

1. The plan should include a nationally consistent method for identifying and mapping "habitat critical to survival" that is suitable for EPBC referral screening, including mapped buffers around maternity and permanent roosts and mapped flyways where these are known. This would materially improve avoidance planning and reduce late-stage conflicts in project assessment.
2. The plan should explicitly adopt a mitigation hierarchy statement for EPBC decision-making: avoidance of significant caves is mandatory; minimisation and rehabilitation apply to above-ground habitat impacts; offsets are only considered for genuinely residual impacts to above-ground habitat and must not be used to make cave destruction acceptable. This would align the recovery plan with best-practice impact assessment and reduce perverse incentives.
3. the plan should include minimum national competency requirements for roost investigations and monitoring, given the disturbance sensitivity of ghost bats and the need for consistent data. The plan already promotes non-invasive methods, and this should be supported by explicit requirements for low-disturbance survey design and for seasonal timing that avoids pregnancy, birth and lactation periods.

Conclusion

EIANZ supports the intent of the Draft National Recovery Plan for the Ghost Bat (*Macroderma gigas*) and agrees that achieving the objective of at least 10% real recovery over 15 years requires threat mitigation and habitat restoration, in addition to avoiding further decline.

EIANZ submits that the plan must be strengthened to operate effectively as a statutory recovery instrument under the EPBC Act. In particular, the plan must remove discretionary language where actions are necessary to prevent decline, and state unequivocally that significant geologically stable natural caves used as maternity, permanent or regular roosts **must not be** destroyed as they cannot be offset.

EIANZ further recommends mandatory predator monitoring and response, enforceable controls on barbed wire entanglement, enforceable disturbance buffers, stronger mine closure obligations where mine roosts are used, integrated climate and disease risk management, clear national data governance, and a maximum five-year review cycle linked to adaptive management triggers. These changes will increase the plan's practical utility, improve consistency of EPBC decision-making, and materially strengthen the likelihood that the stated recovery objective can be achieved.

The plan should identify some simple easy 'wins' that lead towards regional or national recovery actions. These plans are often used by proponents when they do an offsetting process or develop mitigation at the site level. Providing some simple options and statements instead of overarching objective statements would assist.

The recovery document also needs to emphasise that each region has different issues, and a one-stop shop approach is not going to work. For example, in WA, the mining is a major risk to Ghost Bats, but it is also a major potential solution to regional stability and hopefully recovery. The mining companies are the ones funding the surveys, research, offsetting disturbance and contributing to these actions. In Qld, the major threats are barbed wires, pest and habitat degradation through fire, cattle grazing (and possible increase of wind farms which is yet to be assessed). The proposed actions are very weak and require the promotion and coordination of ghost bat in the region and avoid loss natural rock shelter. However, the plan lacks strong actions regarding the loss of habitat and management of cattle grazing despite outlining these are high threats. How will this be achieved, what measures the government or proponent should be taking to reduce cattle, protect habitat and finance pest management or work with landowner to better manage their land. The plan must provide clearer and more practical solutions to protect, maintain and restore above-ground habitat.

Yours Sincerely,



Belinda Bastow
EIANZ WA Division President
wa@eianz.org



Kelly Matthews
EIANZ Heritage SIS Chair
ecology@eianz.org