



FORMAL SUBMISSION

Draft National Recovery Plan for the Gang-gang Cockatoo

Callocephalon fimbriatum

Recovery planning for the Anthropocene

Submitted by

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30 July 2026

This submission supports adoption of a national recovery plan, subject to substantial strengthening of the current draft's climate, implementation, accountability and cultural dimensions.

Executive summary

The Draft National Recovery Plan for the Gang-gang Cockatoo is a serious, scientifically informed and unusually contemporary foundation for national recovery. It recognises the scale of the species' decline, the impacts of the 2019-20 fires, the importance of mature hollow-bearing trees, the significance of urban Canberra, the need to identify climate refugia and the value of community participation. The Department is commended for preparing the first national recovery plan for a much-loved and endangered Australian bird.

The draft's central weakness is not that it fails to identify the major problems. It is that its strongest diagnoses are not carried consistently into priorities, measurable outcomes, implementation arrangements and funding. Climate change is assessed as a very-high threat, yet the principal action to model future range shifts and integrate adaptation into habitat protection, restoration, reserve design and fire management is only Priority 3. Urban Canberra supports the largest known concentration of breeding pairs, but there is no integrated urban recovery strategy. The loss of mature trees is recognised, but the draft sets no quantified hollow-retention or recruitment targets. The plan supports First Nations participation but does not yet recognise Aboriginal Science as a knowledge system or the Gang-gang as part of living First Nations culture, kinship and heritage.

Most importantly, the draft does not operate as a complete implementation plan. It contains no indicative costings, few clearly assigned lead responsibilities, no funded delivery structure, and its performance criteria mostly measure activity or knowledge rather than ecological recovery. A plan can identify the right actions and still fail if nobody is clearly responsible, resources are not committed, and progress can't be measured.

Australia now needs to write recovery plans for the Anthropocene. Recovery can no longer be based on an assumption that historical climatic envelopes, disturbance regimes and habitat distributions will remain stable. For climate-sensitive species such as the Gang-gang Cockatoo, plans must be forward-looking, dynamic, culturally informed, designed for compounding ecological disruption and capable of changing course when ecological thresholds are crossed. The final Gang-gang recovery plan represents an important opportunity to establish a new national standard.

No recovery plan, however well designed, can fully compensate for unchecked climate change. For the Gang-gang Cockatoo - and indeed Australia's biodiversity more broadly - rapid and sustained reductions in greenhouse gas emissions remain essential to limit future ecological disruption. Climate adaptation and emissions reduction are complementary, not alternative, conservation strategies. The plan should say this.

This submission supports the draft as a strong foundation but recommends substantial additions before adoption. Recommendations are intended to make the plan more practical, measurable and capable of delivering genuine recovery over the next decade and beyond.

The final plan should not merely describe the pressures of the Anthropocene. It should be designed to recover the Gang-gang Cockatoo within them.

Summary of recommendations

No.	Recommendation
1	Adopt an explicit framework for recovery planning in the Anthropocene.
2	Make climate adaptation a Priority 1, whole-of-plan responsibility.
3	Assess and manage compound and cascading threats.
4	Strengthen immediate protection of habitat critical to survival.
5	Establish a National Gang-gang Hollow Security Strategy.
6	Establish a dedicated Urban Gang-gang Conservation Strategy.
7	Replace broad performance statements with measurable ecological targets, baselines and interim milestones.
8	Revise the vision and objectives to reflect dynamic ranges, ecological resilience and achievable threat reduction.
9	Integrate Aboriginal Science, First Nations culture and living cultural heritage throughout the plan.
10	Accelerate and regionalise fire, drought and heatwave planning.
11	Prioritise research according to management decisions it enables.
12	Establish a statistically robust national monitoring framework.
13	Strengthen governance, accountability and Traditional Custodian authority.
14	Cost, fund and dynamically review implementation.

About the submitter

Gregory Andrews is a D'harawal man and the Managing Director of Lyrebird Dreaming Pty Ltd, a Supply Nation-certified First Nations social enterprise focusing on caring for Country and climate action. Gregory trained as an economist and is a former Australian diplomat and former senior Australian public servant. He served as Australia's Threatened Species Commissioner from 2014 to 2017 and has extensive experience communicating science and ecology with governments, communities and the public.

This submission draws on Gregory's experience in threatened species policy, environmental governance, public administration, climate policy, Aboriginal knowledge systems, community engagement and science communication. As a D'harawal man, Gregory brings lived experience of Caring for Country, including cultural burning and long-term observation of Australian ecosystems. His perspective draws on both Aboriginal Science and contemporary environmental policy.

1. Write the recovery plan for the Anthropocene

Recommendation: Insert an explicit whole-of-plan framework explaining how recovery will be pursued under accelerating climate change, ecological disruption and shifting habitat suitability.

The draft already recognises many realities of the Anthropocene: warming, megafire, drought, heatwaves, changing habitat suitability and the possibility that future refugia may not coincide with the species' historic strongholds. But these ideas remain dispersed through the plan rather than operating as its organising framework.

Traditional recovery planning has usually followed a broadly linear model: identify historical habitat, control known threats, restore habitat and monitor recovery. That model is no longer sufficient for climate-sensitive species. Historical habitat may become unsuitable; restoration undertaken today may mature under a different climate; catastrophic and repeated fires can prevent recovery before hollow-bearing trees are replaced; and local gains can be overwhelmed by compound regional events.

A recovery plan for the Anthropocene must therefore be forward-looking, scenario-based and adaptive. It must protect current habitat while identifying future habitat, plan for ecological surprise, respond to compound events and establish thresholds that trigger stronger intervention. It must also recognise that recovery is not simply a return to a historic ecological state. It's the maintenance of viable, connected and culturally significant populations through continuing environmental change.

During preparation of this submission, I took a field trip to Mallacoota in Far East Gippsland Victoria, one of the landscapes most profoundly affected by the 2019-20 Black Summer fires. Resident birders with decades of experience in the area consistently told me that Gang-gang Cockatoos, while not abundant, were regularly encountered before the fires but are now almost entirely absent. They reported a similar pattern for the Glossy Black-Cockatoo. These observations are anecdotal rather than systematic survey data, but they provide a powerful illustration of the realities of conservation in the Anthropocene. Localised populations can effectively disappear within a few years following catastrophic or compound disturbances, even where suitable habitat may eventually recover, albeit over decades. Recovery planning thus needs to anticipate rapid ecological change and collapse rather than assuming gradual or linear trajectories.

The final plan should thus include a short section near the beginning titled ‘Recovery planning in a rapidly changing climate’. This should make clear that all actions will be tested against projected climatic conditions and that implementation will be revised as conditions and evidence change.

Experience at Mallacoota and elsewhere demonstrates why recovery planning must increasingly focus not only on restoring populations after catastrophic events, but on identifying, protecting and strengthening climatic refugia and other resilient landscapes before those events occur.

2. Make climate adaptation a Priority 1 responsibility

Recommendation: Upgrade Action 4.16 to Priority 1, commence future-range and refugia modelling immediately, and embed climate adaptation across every objective and action area.

The draft identifies climate change as a very-high-risk threat. It recognises the importance of climatic refugia and proposes modelling of future range shifts, future habitat, reserve-system needs and climate adaptation. Yet Action 4.16 is assigned Priority 3, which the plan defines as desirable but not critical. This is inconsistent with the draft’s own risk assessment.

Adaptation is essential because further climate change is already unavoidable. But adaptation alone cannot secure the long-term future of climate-sensitive species. The success of this and every other Australian recovery plan will ultimately depend on limiting the magnitude of future climate change through large and rapid reductions in greenhouse gas emissions.

Similarly, research into susceptibility to heat stress is Priority 2 and is scheduled over five to ten years. That timeframe is poorly matched to accelerating climate change, the immediacy of worsening heatwaves and the potential consequences for survival, breeding and premature fledging.

Climate adaptation should not sit mainly within the knowledge objective. It should be expressly built into habitat mapping, development assessment, restoration, urban forest planning, connectivity, reserve acquisition, fire management, water security and monitoring. The final plan should also distinguish between research needed to refine action and no-regrets actions that should proceed despite uncertainty.

Protecting cool, connected and structurally complex habitat with mature trees is a no-regrets action. So is retaining environmental gradients that allow movement to higher elevations or cooler aspects. Waiting for perfect modelling before protecting these features would be contrary to the precautionary principle.

Specific amendments

Reclassify Action 4.16 as Priority 1 and require preliminary outputs within two years; link all habitat and restoration actions to projected future suitability; require climate scenarios to be considered in development assessment guidance; and issue interim heat-response guidance before completion of long-term research.

3. Manage compound and cascading threats

Recommendation: Add a compound-risk assessment and require monitoring and management to address interacting threats rather than treating each threat in isolation.

The plan identifies major individual threats, but the Gang-gang Cockatoo is unlikely to experience them independently. Warming intensifies drought and canopy stress; drought reduces food and water; severe

fires destroy hollows and concentrate surviving birds in refuges and urban areas; concentration increases competition, feeding and disease risks; and repeated fire prevents habitat from recovering. Changing climates also alter species distributions and ecological interactions.

All of these produce consequences greater than the sum of the individual threats. A conventional risk matrix that assesses each pressure separately therefore understates the true risk.

The final plan should analyse at least drought followed by wildfire, heatwaves during nesting, fire followed by food shortage, climate contraction combined with land clearing, urban concentration combined with disease and collision risks, and repeated fire before habitat recovery. Monitoring triggers and emergency responses should be designed around these combinations.

Climate change also threatens Gang-gang Cockatoos by reshaping the ecological communities within their habitat. As a D'harawal man and long-term birder, I have observed Rainbow Lorikeets expanding into parts of south-eastern Australia where they were formerly uncommon. While the causes require further investigation, climate change, urbanisation and changing food resources are all likely to be contributing. In the ACT, I have observed Rainbow Lorikeets aggressively displacing King Parrots and other hollow-nesting birds from nesting hollows. If similar processes are occurring within Gang-gang habitat, expanding Rainbow Lorikeet populations will reduce the availability of nesting hollows precisely in these cooler landscapes that otherwise function as climatic refugia. This warrants monitoring and adaptive management as an emerging consequence of climate-driven ecological change.

4. Strengthen protection of habitat critical to survival

Recommendation: Replace the phrase 'whenever possible' with a strong decision rule against destruction or significant modification of habitat critical to survival, and apply interim precautionary protection before mapping is complete.

The draft provides a thoughtful description of habitat critical to survival. It includes nesting and foraging resources, future hollow recruitment, connectivity, ecological processes, cool microclimates and refugia from heat, drought and fire. This is a strength.

But the statement that habitat critical to survival should 'whenever possible' not be destroyed or modified is too weak. Habitat defined as necessary for persistence and recovery should not be treated as optional. This wording also risks undermining the value of the plan in environmental assessment and land-use decisions.

Detailed mapping is essential, but protection should not be postponed until all habitat is mapped. Otherwise, it will be too late. Known breeding sites, breeding aggregations, mature hollow-bearing stands, important foraging areas, functional corridors and plausible climate refugia should all receive immediate precautionary protection.

The final plan should explain clearly how habitat-critical-to-survival mapping and management guidelines will influence Commonwealth approvals, state and territory assessment, local planning, forestry, infrastructure, strategic assessment and offsets.

Proposed wording

‘Habitat critical to survival must not be destroyed, significantly modified or subjected to actions likely to impair its ecological function, except in genuinely exceptional circumstances where required by law and where the action is demonstrably consistent with the species’ recovery.’

5. Establish a National Gang-gang Hollow Security Strategy

Recommendation: Create a Priority 1 national strategy with measurable retention, protection and recruitment standards for existing and future hollow-bearing trees.

The draft correctly identifies the Gang-gang as an obligate cavity nester and recognises that eucalypt hollows commonly take well over a century to form. It also recognises that breeding aggregations may depend on stands containing multiple suitable hollows within a small area.

But the actions remain largely qualitative. The plan does not define adequate retention, buffers around nest trees, management of breeding aggregations, age-class recruitment, public-safety protocols, post-fire retention or replacement standards. Protecting an occupied tree while degrading the surrounding stand may preserve the tree but destroy the breeding system.

A National Gang-gang Hollow Security Strategy should map and assess known and potential nest trees; establish protection zones around nest trees and breeding aggregations; retain all relevant age classes; recruit future hollow trees; provide arboricultural alternatives to removal; protect dead and fire-damaged habitat trees where safe; and monitor hollow availability and condition.

Artificial hollows should be trialled where appropriate, but only as a supplementary measure. Nest boxes and offsets cannot reproduce the ecological value of mature hollow-bearing trees - especially within the recovery timeframe.

The strategy should also monitor changes in competition for nesting hollows from other cavity-nesting species whose distributions are shifting under climate change - including expanding Rainbow Lorikeet populations but also invasive Common Mynas in the ACT, for example.

6. Recognise urban forests as recovery habitat

Recommendation: Prepare a Priority 1 Urban Gang-gang Conservation Strategy, initially centred on Canberra and adaptable to other urban and peri-urban populations.

The draft records that urban Canberra supports the largest known number of breeding pairs, including active nests in nature reserves and street trees. It also identifies the Canberra population as likely to be important because of its relatively high breeding activity.

This finding has profound implications. Urban trees, parks, suburban reserves, large gardens, golf courses, schools, cemeteries, Defence land and transport corridors are not peripheral habitat. In some places they form a central and growing part of the species’ conservation estate.

The draft contains several urban-related actions, including supplementary feeding research and management of possum competition, vehicles and powerlines. These measures do not yet amount to a coherent urban recovery strategy. Furthermore, the ACT Government’s own data shows that tree canopy

cover has been declining over the past five years. It is also currently considering expediting development approval processes that will likely result in removal of old trees suitable for nesting.

The final plan should require municipal tree-retention protocols, breeding-site protection, climate-resilient replacement planting, connected movement corridors, cool refuges and water during extreme events, collision-risk reduction, disease surveillance, safe feeding guidance, and coordinated responsibilities across governments, utilities and private landholders.

The strategy should also recognise the opportunity presented by a charismatic species living close to people. Urban recovery can build public participation, stewardship and support for mature-tree retention across the broader urban forest.

7. Use measurable ecological targets and interim milestones

Recommendation: Establish a 2027 baseline, quantitative population and habitat indicators, and two-year, five-year and ten-year milestones.

The draft's performance criteria include maintaining nesting and foraging habitat, retaining hollow-bearing trees, stabilising health and breeding success, addressing knowledge gaps and sharing information. These are reasonable themes, but many cannot be audited because they lack a baseline, numerical targets, spatial units or agreed methodologies.

Several criteria measure knowledge or activity rather than recovery. Assessing a threat does not reduce it. Publishing data does not demonstrate that the population is stabilising. The final plan should distinguish ecological outcomes from enabling actions.

Core population indicators should include abundance, occupancy, adult survival, juvenile recruitment, breeding participation, fledging success and the retention of breeding aggregations. Habitat indicators should include hollow availability, age-class recruitment, foraging resources, connectivity and refuge condition. Threat indicators should measure reductions in habitat loss, damaging fire exposure, heat vulnerability, disease and competition.

A single assessment horizon of 2037 is too distant. Annual reporting, two-year establishment milestones, a five-year ecological review and a ten-year outcome assessment would provide far stronger accountability.

8. Revise the vision and objectives

Recommendation: Revise the 2050 vision to accommodate shifting and newly established populations, cultural values and ecological resilience, and replace the impossible objective that threats should not impact the species.

The vision refers to all populations 'as of 2027'. That wording may unintentionally freeze the plan's spatial conception of the species even though climate change is shifting populations, creating new refuges and requires active establishment in future suitable habitat.

Objective 3 states that threats should be managed so they do not impact the species. Fire, heat, drought and disease cannot realistically be prevented from having any impact. An impossible objective weakens accountability because failure is inevitable but not meaningfully measurable.

The vision should also recognise that the species has deep cultural as well as biological significance, and that recovery should sustain relationships between people, species and Country.

Suggested revised vision

‘By 2050, all extant and newly established populations necessary for recovery are viable, genetically diverse and resilient within high-quality, connected and well-managed habitat, including secure climatic refugia. The Gang-gang Cockatoo’s ecological and cultural significance is sustained, and governments, Aboriginal knowledge holders, land managers, communities and researchers are working together effectively to support its recovery.’

Suggested revised Objective 3

‘Threats are reduced and managed to levels compatible with the long-term recovery, ecological function and evolutionary potential of the species.’

9. Embed Aboriginal Science, culture and living cultural heritage

Recommendation: Replace the narrow cultural-significance treatment with an integrated framework recognising Aboriginal Science, First Nations cultures, living cultural heritage, cultural authority and Indigenous Cultural and Intellectual Property.

The draft states that the significance of the Gang-gang Cockatoo to First Nations peoples is not well documented in conventional published sources. That wording risks confusing absence from Western publication with an absence of Aboriginal knowledge or significance which is clearly not the case. Aboriginal knowledge is usually held orally or locally, can often be culturally restricted, and may not have been sought through appropriate and inclusive processes.

Action 5.2 appropriately supports First Nations leadership and co-designed projects. But the overall framing still positions Aboriginal people mainly as participants in conservation delivery. The final plan should also recognise Aboriginal Science as an evidence-based knowledge system developed through millennia of observation, experimentation and adaptive management of Country. It should recognise the Gang-gang as part of living First Nations cultures, identity, language, story, responsibility and Country. As a D’harawal man, the Gang-gang Cockatoo is a significant totemic species to me, my kinship network and my broader Aboriginal community.

For Aboriginal people, natural heritage and cultural heritage are not separate categories. The Gang-gang is not merely a bird that occurs on Country. It is part of Country. Its decline therefore involves cultural, kinship and identity loss as well as biodiversity loss.

The revised plan should establish a culturally authorised process through which Traditional Custodians can identify what knowledge may be shared and how it can inform recovery. It should protect Indigenous Cultural and Intellectual Property, fund participation and leadership, include Aboriginal representatives in governance, and develop cultural indicators alongside ecological indicators.

The terminology should be consistent. ‘Aboriginal Science’ should be used when referring to scientific and ecological knowledge systems. ‘First Nations culture’, ‘cultural heritage’ and ‘cultural authority’ should be used for the wider cultural dimensions. Aboriginal Science should be integrated throughout habitat, fire, monitoring, research and governance rather than confined to a single section.

Suggested replacement heading for section 1.2

‘Aboriginal Science, cultural significance and living cultural heritage’

Suggested new Priority 1 action

Co-design with relevant Aboriginal knowledge holders a program to document cultural significance where communities choose to do so; identify culturally appropriate recovery priorities; embed Aboriginal Science in management and research; establish Indigenous Cultural and Intellectual Property protocols; and resource Aboriginal leadership in implementation and governance.

10. Accelerate and regionalise fire, drought and heatwave planning

Recommendation: Issue interim national guidance within two years and develop regionally co-designed fire, drought and heatwave plans with operational triggers and measures. The final plan should specifically encourage co-designed research between Traditional Custodians and ecologists to investigate how cultural burning influences Gang-gang habitat, breeding ecology and long-term population resilience.

The fire action is one of the stronger components of the draft plan. It recognises large wildfires, repeated burning, hollow and food-tree retention, natural regeneration, monitoring and adaptive management. But a five-to-ten-year timeframe is too slow for a Priority 1 response to a very-high-risk threat.

While national principles are needed, a single national fire plan should not imply uniform prescriptions. Fire ecology, landscape condition and cultural authority vary across the range. The final plan should distinguish high-severity wildfire, repeated fire, prescribed burning, cultural fire, suppression, mechanical treatment and post-fire salvage. These activities are not ecologically interchangeable.

As a D'harawal man, I have led and implemented cultural burning on Gang-gang Cockatoo Country over many years. Through those burns I have consistently observed Gang-gang Cockatoos becoming more active in recently and repeatedly culturally burned landscapes, including increased use of those areas during the breeding season. On many occasions the birds have appeared soon after burning commenced and remained present and watched from the trees while burns were being undertaken. These are field observations rather than experimentally tested results, and they should not be over-interpreted. But they illustrate how Aboriginal Science generates ecological hypotheses through careful, repeated observation of Country over time. They also suggest that further research into the relationship between cultural burning, habitat condition, predator behaviour, nesting success and Gang-gang occupancy could make a valuable contribution to future recovery planning.

The drought and heatwave actions are much less developed and contain apparent drafting errors and circular cross-references. They should specify practical measures such as protecting water sources, identifying cool refuges, emergency water protocols, nest monitoring during heat, wildlife rescue arrangements, post-event mortality assessment and temporary protection of critical feeding areas.

Management should be activated by defined thresholds rather than waiting for the next scheduled review.

11. Prioritise research by its management value

Recommendation: Reorder research priorities according to the decisions they unlock, the urgency of those decisions and the availability of interim precautionary action.

The draft proposes valuable work on population structure, demography, breeding sites, hollows, movements, fire, food, disease and climate. The program is comprehensive, but partly resembles a catalogue of scientific questions rather than a decision-focused recovery program.

Every research action should identify the management decision it will inform, who will use the results, when interim findings will be available, how the results may change management and what precautionary action applies while research is incomplete.

Future-range modelling and movement research, for example, directly affect connectivity, reserve design, restoration and development assessment. The current Priority 3 status appears lower than what the management value warrants.

Research should be classified as management-critical and urgent, important for medium-term refinement, or strategic and exploratory. This will make funding choices clearer and reduce the risk that uncertainty becomes a reason for delayed action.

12. Create a national monitoring framework

Recommendation: Establish a statistically designed National Gang-gang Monitoring Framework that integrates systematic surveys, nest monitoring, demography, Aboriginal and citizen science and transparent annual reporting.

The draft rightly proposes surveys, nest searches, a central database and volunteer networks. It also acknowledges the challenges created by uneven survey effort and the clustered distribution of the species. The apparent importance of Canberra may partly reflect intensive monitoring, while previous transects generated too few detections for robust population estimation.

A national framework should thus specify survey design, detection correction, sampling frequency, demographic methods, common data standards and integration of Birddata, eBird and other community observations. Sensitive nest-location data will require appropriate controls, while Aboriginal knowledge will require Indigenous data governance.

Citizen science is a major opportunity because the Gang-gang Cockatoo is conspicuous, charismatic and widely loved. But volunteer observations should supplement rather than replace properly funded systematic monitoring.

The framework should produce annual national and regional reporting that is accessible to land managers, Traditional Custodians, researchers, decision-makers and the public.

13. Strengthen governance and accountability

Recommendation: Establish the national recovery team immediately upon adoption, assign lead agencies and delivery partners to every action, and require published work plans and annual progress reports.

The draft describes implementation as a shared responsibility and proposes supporting establishment of a national recovery team in 2027–28. Shared responsibility is appropriate, but without clear leadership it can become dispersed responsibility.

Each action should identify a lead agency, accountable officer or institution, delivery partners, timeframe, output, ecological indicator and reporting requirement. The recovery team should have an identified Commonwealth lead, state and territory representation, Aboriginal representation through appropriate processes, scientific expertise, community and local-government participation, and a funded secretariat.

The team should publish annual work plans and progress reports, advise on ecological triggers, and have a clear process for recommending reprioritisation when conditions change or implementation falls behind.

Aboriginal participation must extend beyond engagement in projects. Cultural authority should be recognised in governance, and participation must be properly resourced rather than dependent on unpaid contribution.

14. Cost, fund and dynamically review implementation

Recommendation: Include indicative costs, funding pathways, delivery capacity and a formal adaptive-review regime with annual reporting, five-year review and event-triggered reassessment.

The draft contains no indicative implementation costs and does not explain how major actions will be resourced. Range-wide mapping, long-term demographic monitoring, land stewardship, restoration, telemetry, climate modelling and Aboriginal leadership all require sustained investment.

A list of actions without funding is not an implementation plan. The final plan should include cost bands for each action, likely funding sources, immediate priorities, staffing requirements and a ten-year implementation budget. It should identify what can be delivered through existing programs and what requires new funding.

The plan should also be adaptive. In addition to annual implementation reporting and a comprehensive five-year review, it should provide for rapid reassessment following major events that affect a significant proportion of the species' range or population.

Potential triggers include a major fire across important habitat, loss of a breeding aggregation, a significant fall in occupancy or breeding success, repeated reproductive failure, heat-related mortality, detection of significant disease spread, degradation of identified refugia or climate modelling showing a substantial shift in future suitability.

Additional drafting and internal-consistency issues

The following matters should be corrected irrespective of the larger policy recommendations:

- Action 3.3 is described as a heatwave-management action but refers to minimising the effects of extreme droughts.
- Actions 3.2 and 3.3 refer circularly to new knowledge arising from the same action, rather than linking to the relevant research actions.
- Terminology alternates among ‘Indigenous’, ‘First Nations’ and ‘Traditional Ecological Knowledge’. The language should be reviewed for consistency and contemporary framing.
- The vision’s reference to populations ‘as of 2027’ may be too restrictive under future range change.
- The 2050 vision, 2037 performance criteria and numerous five-to-ten-year actions need a clearer temporal relationship and interim milestones.
- The publication page uses a 2027 copyright and citation date during a 2026 consultation. This may be intentional preparation for final publication but should be checked.
- The stated area-of-occupancy range appears to contain a typographical error: ‘22,7000 km²’.
- The phrase ‘whenever possible’ in relation to habitat critical to survival should be replaced with a stronger standard.
- Several action descriptions combine activities, outputs and performance indicators without clearly distinguishing between them.
- Capitalisation of ‘Gang-gang’ should be standardised throughout the document.

Strengths that should be retained

The final plan should retain the draft’s strong synthesis of population decline and post-fire risk, its precautionary treatment of uncertainty and its recognition that the 2019-20 impact estimates may be conservative.

It should retain the broad ecological definition of habitat critical to survival, including future hollow recruitment, connectivity, cool microclimates and refugia from drought, heat and fire.

It should retain the recognition of Canberra as a likely important population and of street trees and urban reserves as breeding habitat.

It should retain the emphasis on mature hollow-bearing trees and the need to recruit future hollow trees, while strengthening these commitments with measurable standards.

It should retain support for community monitoring, a central nest database, national coordination and First Nations-led and co-designed conservation, while expanding these into robust monitoring, governance and cultural frameworks.

Conclusion

The Gang-gang Cockatoo is an iconic and much-loved Australian species whose decline reflects many of the pressures now reshaping south-eastern Australia: the loss of old trees, fragmentation, climate change, megafires, drought, heat, disease and the cumulative effects of development. Its recovery requires more than a conventional list of conservation actions.

The draft plan provides an excellent opportunity. It already contains much of the science and many of the concepts required for a modern recovery plan. The task now is to convert those concepts into urgent priorities, strong protection, measurable ecological targets, funded implementation, clear responsibility and dynamic adaptation.

It is also an opportunity to recognise that the Gang-gang Cockatoo is part of both natural and cultural heritage. Recovery should draw on Aboriginal Science and uphold Aboriginal culture, knowledge, authority and relationships with Country. This is not an additional social component attached to ecological recovery. It is part of a more complete understanding of what recovery means.

As an Aboriginal man who has worked in threatened species conservation, climate policy and direct caring for Country, I have learned that no single knowledge system has all the answers to the ecological challenges of the Anthropocene. The strongest recovery plans will draw confidently from contemporary ecological science, Aboriginal Science and the practical experience of land managers and communities.

I therefore support adoption of a national recovery plan for the Gang-gang Cockatoo, subject to substantial strengthening consistent with the recommendations in this submission. A final plan built on these principles could become not only a stronger plan for this species, but a model for how Australia writes recovery plans for the Anthropocene.

END OF SUBMISSION