

Draft recovery plans for south-eastern red-tailed black and gang-gang cockatoos

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About the Invasive Species Council

The Invasive Species Council was formed in 2002 to advocate for stronger laws, policies and programs to keep Australian biodiversity safe from weeds, feral animals, exotic pathogens and other invaders. It is a not-for-profit charitable organisation, funded predominantly by donations from supporters and philanthropic organisations.

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Introduction

Australia is home to over 50 native species of parrots and cockatoos, most found nowhere else on earth. Twenty-two species or subspecies are listed as threatened under the *Environment Protection and Biodiversity Conservation Act 1999*, and the gang-gang cockatoo and south-eastern red-tailed black cockatoo are among the most imperilled. The Invasive Species Council welcomes the opportunity to comment on the draft recovery plans for both species.

This submission focuses on a critical omission shared by both recovery plans: the failure to adequately recognise or act on the threat posed by novel pathogens – including new genotypes of diseases already present in Australia's bird populations – at the same time as when the Australian Government is proposing to resume widespread live parrot imports for the first time in 30 years.

The stakes are high. Recovery of these species requires decades of sustained effort and millions of dollars in investment. A single novel pathogen introduction could rapidly undo that work and waste the investment. Novel pathogens present a genuine risk: in the 5 years between 1990 and 1995 – the last period of widespread live parrot imports – 2 new pathogens known to cause fatal disease entered Australia despite quarantine. One, parrot bornavirus, is described by the Department of Agriculture, Fisheries and Forestry (DAFF) as 'one of the greatest threats to endangered psittacine species' [1]. To our knowledge that disease has not yet established in wild native parrot populations, but the risk remains. The proposal to resume live parrot imports will once again open the same pathway for novel pathogens.

Both recovery plans acknowledge the threats posed by psittacine beak and feather disease (PBFD) and, to a lesser extent, high pathogenicity avian influenza (HPAI), but treat disease as a matter for monitoring and reactive management rather than prevention. Neither plan recognises the much broader range of novel pathogens that could be introduced through live parrot imports, nor includes any action to keep that pathway closed.

We urge the drafters of the plans to update the plans to address these critical gaps, and make specific recommendations below.

Recommendations

Recommendation 1: Amend the disease threat sections of both recovery plans to explicitly recognise that novel pathogens – including novel genotypes of established diseases such as PBFD – pose a significant potential threat to both species, and that the resumption of live psittacine imports represents a preventable pathway for their introduction.

Recommendation 2: Include an action to remove all psittacine species from the Live Import List under the EPBC Act, including the 3 species for which assessments are now 20 years old. Include a further action that the recovery teams and relevant environmental agencies engage with DAFF's psittacine import risk review process and any assessments of applications to add psittacine species to the Live Import List, to ensure the potential disease risks to both species are explicitly factored into those assessments.

Recommendation 3: Include actions to: (a) add serious parrot diseases – including PBFD, Pacheco's disease, proventricular dilatation disease – in any vulnerable, endangered or critically endangered psittacine species to the national list of Notifiable Animal Diseases; (b) assess the distribution and

genotypic diversity of beak and feather disease virus in both species and in common psittacine species with overlapping ranges, to establish a baseline against which the introduction of novel genotypes could be detected; and (c) conduct ongoing surveillance for a wider range of emerging psittacine diseases using genomic and next-generation sequencing techniques.

Background: the proposal to resume live parrot imports

Since 1995, Australia has maintained a policy to not permit the import of live parrots from any country except New Zealand, owing to an inability to adequately assess and manage the disease risks to native birds. The policy followed 5 years of permitted imports (1990–1995) during which approximately 4,800 birds were imported from overseas. Despite undergoing standard post-entry quarantine, two novel, fatal psittacine pathogens were discovered in Australia following the release of imported birds:

- **Psittacid herpesvirus-1**, the cause of the rapidly fatal Pacheco's disease, was detected in green-winged macaws in 1993 and subsequently found in wild birds between 2019 and 2021 [5].
- **Parrot bornavirus**, the cause of proventricular dilatation disease – a fatal disease of captive psittacines and one of the greatest threats to endangered psittacine species – was detected in green-winged macaws in 1997 and subsequently in other captive parrots [6].

Wildlife Health Australia has described the bornavirus episode as 'a salutary lesson' that is 'likely to be repeated in future for other, currently unknown diseases, possibly with greater consequences' [2].

Despite this history, following a review of import risks for psittacine birds from all countries DAFF is proposing to lift the 30-year parrot import restriction [1]. Applications are already before the Department of Climate Change, Energy, the Environment and Water to add new parrot species (such as the white-bellied caique) to the Live Import List under the EPBC Act.

The Invasive Species Council's response to DAFF's 2020 *Draft import risk review for psittacines from all countries* (IRA) highlighted how the assessment systematically understated the dangers that imported novel viruses, outlined below, pose to native psittacine species, including nationally listed threatened parrots.

- **Avian paraavulavirus 3**: The *Neophema* genus, including the critically endangered orange-bellied parrot, is reported to have high susceptibility to this highly contagious virus, yet the effect on the environment was rated as only of 'minor significance at the national level' and the overall risk as 'very low' in the IRA.
- **Parrot bornavirus**: Documented in over 80 species of parrots, 'one of the greatest threats to endangered psittacine species', yet rated 'very low' risk with biosecurity measures, despite unreliable testing.
- **Avian orthoavulavirus 1**: Highly contagious, can cause acute disease, death or chronic illness, yet the effect for wild birds was rated as 'minor significance at the national level' even though all psittacine species are considered 'highly susceptible' to infection.
- **Psittacine poxvirus**: Can cause systemic or severe disease, with a high risk of establishment, rated as 'very low' risk on the basis of biosecurity measures (requirement of a veterinary examination), even though the disease can be latent.

DAFF's proposed biosecurity measures for the 4 pathogens it assessed as having an unrestricted risk estimate exceeding 'very low' in the IRA rely on pre-export and post-entry quarantine with testing for particular pathogens. While quarantine is a broad measure that may allow diseases with evident symptoms – whether specifically assessed in the IRA or not – to be caught in a veterinary examination, it is not failsafe for either latent or benign infections not subject to testing. For those pathogens for which specific measures are proposed in the IRA, the adequacy of testing is contradicted by the scientific literature. For example, current diagnostic tests for avian bornavirus are not sufficiently reliable as the incubation period may range from weeks to years [3]; infected birds may shed the virus intermittently or rarely [3]; and, as acknowledged in the IRA, diagnosis is 'problematic due to the remarkable genetic variability' of the virus [1]. A negative test result is not indicative of being uninfected [4].

Disease experts at Wildlife Health Australia also disagreed with DAFF's disease impact ratings and criticised the IRA for downplaying several diseases of concern [2].

The proposal to resume widespread live parrot imports is directly relevant to the recovery of the gang-gang cockatoo and south-eastern red-tailed black cockatoo. If imports proceed, both species will face significantly elevated risks from novel pathogens – risks that neither recovery plan currently recognises or plans to address.

Disease risks to gang-gang and south-eastern red-tailed black cockatoos

General vulnerability

Both cockatoo species are in a condition that makes them highly vulnerable to disease introduction, and that vulnerability is compounded by the immunosuppressive effects of PBFD. The threat abatement advice for PBFD notes that disease causes 'long-term immunological suppression' in affected birds [5], meaning that birds exposed to PBFD are likely to be more susceptible to secondary infections from other pathogens. A novel pathogen introduced into a population already burdened by PBFD would therefore encounter multiply compromised hosts: stressed by the cumulative pressures of habitat loss, invasive species, fire and population decline, and immunologically weakened by an endemic disease.

The gang-gang cockatoo is listed as endangered following a rapid population decline, with an estimated 17,600–35,200 mature birds remaining after catastrophic losses in the 2019–2020 bushfires. The threat abatement advice for PBFD predates the species' listing, so no formal PBFD risk rating exists for the gang-gang. The population from the Hornsby and Ku-ring-gai local government areas is documented to have a high incidence of PBFD [6], but prevalence across the rest of the species' range is unknown. This lack of data does not indicate an absence of threat; rather, it highlights a critical gap in surveillance that needs to be addressed within the recovery plan.

The south-eastern red-tailed black cockatoo is among Australia's most imperilled birds: a single nomadic population of approximately 885–1,545 birds, food-limited and experiencing declining recruitment, confined to less than 18,000 km² of south-western Victoria and south-eastern South Australia. The threat abatement advice for PBFD rates the subspecies as facing a 'high' level of risk from PBFD, warning that 'with only a single population in a small area, a great impact could occur'

[5]. For a population this small and this slow to reproduce, a disease outbreak – from PBFD or any other pathogen – could be catastrophic and irreversible.

Risks from novel genotypes of established diseases, particularly PBFD

Both recovery plans treat PBFD as an established, chronic background threat requiring monitoring and management. Neither plan addresses a distinct and potentially serious risk: the introduction of novel genotypes of beak and feather disease virus (BFDV) – the virus that causes PBFD – through live parrot imports.

A comprehensive review published in *Animals* in 2025 confirms that PBFD has now been documented in over 40 countries, with its global spread driven overwhelmingly by the international trade in live parrots, both legal and illegal [7]. The review documents that:

- between 1975 and the early 2000s, the global commerce of over 19 million parrots operated with minimal biosecurity oversight
- although BFDV likely originated evolutionarily in Australia, international trade has driven the diversification of BFDV genotypes within captive parrot populations globally
- new recombinant strains of BFDV have appeared in avian populations across Asia, Europe, Africa and South America. Regions with parrot commerce – such as Europe and Asia – serve as key hubs for viral recombination and transmission across species
- captive parrots, even when clinically normal, function as persistent viral reservoirs, and high prevalence rates of BFDV (up to 39.2% in some surveys of asymptomatic captive birds) mean that standard health screening may not identify infected animals
- spillover of novel BFDV genotypes into wild populations – including into the critically endangered orange-bellied parrot – has already been documented overseas and in Australia
- exposing immunologically naïve populations to newly introduced BFDV strains can have devastating consequences, particularly for endangered species.

PBFD is already listed as a key threatening process under the EPBC Act and is rated a high risk for the south-eastern red-tailed black cockatoo. Both recovery plans acknowledge PBFD as a risk. What neither plan acknowledges is that the resumption of live parrot imports into Australia – from countries where novel BFDV genotypes are circulating in captive bird populations – creates a pathway for novel genotype introduction that could dramatically increase the threat of PBFD to these species.

The risks of novel BFDV genotype introduction are distinct from, and in addition to, those of BFDV genotypes already present in Australia. Australian psittacine populations, including the gang-gang cockatoo and south-eastern red-tailed black cockatoo, may have developed some partial immunity or resistance to the genotypes currently circulating in Australia. They may have no such protection against novel genotypes introduced from captive populations overseas.

Risks from novel unknown or poorly known pathogens

The disease sections of both recovery plans focus entirely on PBFD and HPAI – the two diseases currently on the radar of wildlife managers, PBFD as a listed key threatening process and HPAI as the focus of a recent national management agreement. But neither plan takes any account of the much

broader range of novel pathogens – including the rapidly expanding suite of emerging psittacine diseases documented in the recent scientific literature – that could affect these species with equally catastrophic consequences.

In addition to those pathogens that the IRA failed to comprehensively assess – listed in the background section above – a rapidly expanding body of scientific literature is identifying potentially dangerous novel psittacine pathogens – refer to Box 1.

Box 1 – emerging psittacine virus hazards

Since the IRA was published, at least 16 potential new psittacine virus hazards have been reported, including:

- **Astroviruses:** Rated in the IRA as not capable of causing adverse consequences in psittacines. A 2025 study identified 2 novel avastrovirus species causing chronic diarrhoeal and wasting disease in Australian parrots – the first documented astrovirus infections in psittacines [8]. The researchers specifically recommended that imported psittacines be tested for, and demonstrated to be free of, avastroviruses before entry to Australia.
- **Adenoviruses:** Rated in the IRA as not capable of causing adverse consequences in psittacines. This conclusion was contradicted by evidence available even before the IRA – including reports of fatalities caused by an adenovirus in captive red-bellied parrots [9], papers rating adenovirus as a 'key disease threat' for the orange-bellied parrots [10], and papers showing correlation between adenovirus shedding and chick survival [11]. A 2024 paper warned that introduction of psittacine adenovirus 5 into native parrots could 'adversely affect their survival and reproduction'. It reported the presence of the virus in Australia for the first time in exotic monk parakeets in a pet shop [12]. A 2024 study identified a 'novel highly pathogenic' Timneh grey parrot adenovirus that may be the most common recent ancestor for aviadenoviruses pathogenic to parrots, cockatoos and lorikeets [9]. At least 4 additional adenoviruses not known in Australia have been reported since 2020 [13,14].
- **Parvoviruses:** Not assessed in the IRA at all. Since then, at least 5 papers have reported novel parvoviruses in parrots in Australia and overseas, including one associated with episodic mortality events in Australian rainbow lorikeets, and one reported in *Neophema* birds [15–19].
- **Herpesviruses:** Only 2 psittacid herpesviruses were assessed in the IRA. Since 2019, a 'highly pathogenic' new herpesvirus (alphaherpesvirus 5) has been reported in Australia and subsequently in Europe, Brazil and the United States, causing outbreaks of severe herpetic pneumonia with high morbidity and mortality [20–23]. A 2023 paper reported a new herpesvirus (provisionally named alphaherpesvirus 6) detected in a wild rainbow lorikeet in Australia [24], and a 2025 paper reported 3 undescribed herpesviruses in captive cockatoos in Vienna (Austria) related to cacatuid herpesvirus 1 and/or 2 [25].

The rate of new pathogen discoveries has accelerated in recent years, enabled by genomic techniques. There is every reason to expect that further uncharacterised pathogens will be identified in the years ahead. Many novel pathogens have prolonged incubation periods or subclinical presentations, meaning they can pass through quarantine undetected – a risk demonstrated the last time Australia permitted parrot imports, in 1990–1995.

For species like the gang-gang cockatoo and the south-eastern red-tailed black cockatoo – with small or declining populations, slow reproductive rates, and documented susceptibility to disease – the introduction of a single novel pathogen could be catastrophic and irreversible.

Recovery plans: inadequacy of diseases sections and related actions

In 2018, researchers found that only 4 psittacine species then had recovery plans recognising PBFD as a clear threat, and warned that a narrow focus on one disease was ‘unwise’ as ‘outbreaks of other well-recognised common pathogens such as *Chlamydia psittaci*, avian polyomavirus and psittacine adenoviruses could easily wipe out a small population of parrots’ [26]. Both recovery plans have failed to heed this warning.

The disease sections of both plans acknowledge PBFD and HPAI but contain no discussion of other potential pathogens or the risks associated with live parrot imports. The sole disease-related recovery actions – Action 3.4 in the gang-gang plan and Action 5.7 in the south-eastern red-tailed black cockatoo plan – are limited to monitoring for PBFD and HPAI, isolating infected birds, and implementing reactive management if disease is detected.

Reactive monitoring for two known diseases does not constitute an adequate disease management strategy for either species. For the south-eastern red-tailed black cockatoo in particular – a single population of under 1,500 birds already rated 'high' risk for PBFD, with the threat abatement advice warning that 'a great impact could occur' – monitoring detects disease only after it has entered the population. By that point, it may already have reached a level that threatens viability. Prevention, not detection, is the precautionary and appropriate management response for populations of this size and fragility.

To address these critical omissions, the recovery plans for both species should be amended as follows.

Expand the disease threat sections. Both plans should explicitly recognise that novel pathogens – including novel genotypes of established diseases such as BFDV – pose a significant and growing threat to both species, and that the resumption of live psittacine imports represents a direct and preventable pathway for their introduction.

Include disease preventive actions directed at the live import pathway. The plans should include an action to remove all psittacine species from the EPBC Act Live Import List. The proposed removal of 30 unassessed psittacine species is welcome and should proceed immediately [27]. However, the risk assessments for the remaining 3 psittacine species proposed to be left on the list are now 20 years old and predate significant developments in the scientific understanding of psittacine disease. Permitting the resumption of any live parrot imports (no matter the species) would be inconsistent with the recovery plan objectives that threats are managed effectively. In addition, the plans should include actions requiring the recovery teams and relevant environmental authorities to engage directly with DAFF's psittacine import risk review process and with any concurrent assessment of applications to add psittacine species to the Live Import List, to ensure that the specific disease risks to the gang-gang cockatoo and south-eastern red-tailed black cockatoo are explicitly factored into those assessments.

Expand the research and surveillance actions. The plans should include actions to: (a) add serious parrot diseases – including PBFD, Pacheco's disease (caused by *Psittacid herpesvirus-1*), and proventricular dilatation disease (caused by parrot bornavirus) – in any vulnerable, endangered or

critically endangered psittacine species to the national list of Notifiable Animal Diseases; (b) assess the distribution and genotypic diversity of BFDV in both species and in common psittacine species with overlapping ranges, to establish a baseline against which the introduction of novel genotypes could be detected; and (c) conduct ongoing surveillance for a wider range of emerging psittacine diseases – not limited to PBFD and HPAI – in both captive and wild populations, using genomic and next-generation sequencing techniques capable of identifying novel pathogens and novel genotypes of known pathogens.

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