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Department of the Environment and Energy
GPO Box 787
Canberra ACT 2601
Australia

Subject: Draft National Light Pollution Guidelines for Wildlife including Marine Turtles, Seabirds and Migratory Shorebirds

On behalf of our 40 Australian members, I write to offer the International Dark-Sky Association's endorsement of the draft document entitled "National Light Pollution Guidelines for Wildlife including Marine Turtles, Seabirds and Migratory Shorebirds". We urge the Department of Environment and Energy to adopt these best practices and promote their use throughout Australia to provide land managers and property owners with evidence-based advice to reduce the impact of light pollution on various resident and migratory species. Given the particular sensitivity of the animals called out in the title of the document, the guidance may well serve useful purposes not only in Australia, but also throughout the world.

The document specifies a series of principles relating to outdoor lighting, summarized on pp. 8-9 and explained in further detail on pp. 21-24, that are consistent with the messages we have communicated for years. The approach prioritizes human health and safety (pp. 1 and 17) while seeking solutions that minimize the resulting potential harm to wildlife. Chief among these ideas is that the purpose of outdoor lighting should be readily identifiable, and that "the starting point for all lighting designs should be natural darkness," to which light is added as needed for "specific and defined purposes." (p. 21) Once it is established that lighting is warranted, design should proceed according to the notion that the least amount of light is its best use, in location, timing, quantity, and spectrum. We find, again and again, that these techniques are most effective in achieving the twin goals of providing adequate lighting to meet human needs in outdoor spaces at night and reducing the harm associated with that lighting to an absolute minimum.

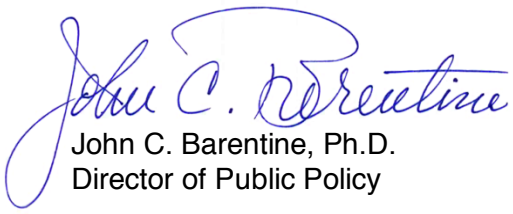
Further, an environmental impact assessment (EIA) process is suggested with best-practice elements (pp. 12-16 and 78-81), coupled with a checklist for practitioners (pp. 44-46) and a series of helpful case studies (pp. 17-19). Further, species-specific guidance is offered for marine turtles (pp. 47-58), seabirds (pp. 59-72) and migratory shorebirds (pp. 73-84). Crucially, this guidance provides conservationists and decision makers with concrete suggestions for assessing threats to these species, designing lighting plans that manage risks, and monitoring implementation. The discussion includes a helpful review of various approaches for measuring and monitoring the impact of artificial light on the nighttime environment (pp. 36-41), as well as recommendations for particular light sources that are (and are not) appropriate for deployment in areas where particular species are present.

This document argues for an iterative approach to design, installation and assessment in order to maximize the benefit to lighting, when and where warranted, while ensuring that the resulting

impacts are manageable. In this, we hope that practitioners will find the tools they need to achieve win-win solutions for communities and commercial enterprises while serving the public interest in protecting the integrity of Australia's natural resources, including its incredible biodiversity.

The draft guidelines, while voluntary in nature and effect, are an important step forward in the management of artificial light at night in Australia for the benefit of wildlife that appropriately balance competing interests and cater to genuine human needs for safe and productive activities in outdoor spaces at night. We hope the Department will give full consideration to their adoption.

Yours sincerely,



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