



UNIVERSITY OF CANBERRA

NEW INTELLIGENCE

Institute for Applied Ecology



26 November 2007

Dr Maxine Cooper, Commissioner,
Office of the Commissioner for Sustainability and the Environment,
PO Box 356, Dickson ACT 2602.
EnvComm@act.gov.au

Dear Maxine,

I wish to make a submission in support of your investigation into the management of lowland native grasslands in the ACT.

I have moved from a position of being comfortable with the management of the ACT lowland native grasslands to being deeply concerned for their conservation in the ACT. These grasslands appear to be suffering from the tyranny of 1000 cuts. We have the

- Airport development;
- Defence management practices that appear to have been hijacked by non-evidential approaches to decision-making;
- Molonglo development;
- Majura-Hume industrial development; and
- Caravan Park land swap.

I put it to you that these developments, and others no doubt to arise from time to time (we heard at the round-table of the RSPCA Building site?), appear destined to have a serious and irreversible impact on the lowland native grasslands and grassy woodlands in the ACT, and to cause a serious deterioration over time in the state of our environment. This is an unsatisfactory state of affairs for a Territory that prides itself on environmental management, and a state of affairs that is likely to receive sustained negative attention.

I would like you to consider the following points.

- (a) There is an urgent need to address coordination across all jurisdictions responsible for the management of lands within the ACT borders (including in particular the Department of Defence and the Canberra International Airport – see Appendix B). I believe it will require commitment and direction at ministerial level within the ACT and federally to overturn what are currently unconstructive processes for making decisions that seriously affect grassland conservation.

Institute for Applied Ecology
Postal: University of Canberra ACT 2601 Australia
Delivery: University Ave, Bruce ACT 2616 Australia
Phone: +61 (02) 62015786 Fax: +61 (02) 62015305
Email: georges@aerg.canberra.edu.au
WWW: <http://aerg.canberra.edu.au>

In particular, I ask that you consider advising the Chief Minister to

- Bring the matter of Canberra Airport development and grassland conservation to the attention of the Federal Ministers for the Environment and Transport, given that there is a new federal government and new federal ministers with the relevant portfolios.
- Use the Canberra International Airport experience as an example in ongoing representations to the federal government by state, territory and local governments on the unsatisfactory planning conflicts and outcomes arising from airport developments Australia-wide. I believe a clearer example could not be found, because this is one instance where not only are there unsatisfactory outcomes in a planning sense, but also serious negative outcomes for conservation.
- Explore options and make recommendations on management arrangements involving the various jurisdictions to achieve better coordination and cooperation. The Limestone Plains Group has made a good suggestion on one possible option.

The promise of the incoming Labor government to abolish or at least reduce the National Capital Authority, which has had its hand in the unsatisfactory management of our grasslands, provides an additional opportunity for improved environmental planning to serve both ACT and Commonwealth aims for the national capital.

- (b) There is a need to establish an environment unit within ACT PLA whose principle function is to inject environmental considerations into planning, and to liaise with the Wildlife Research and Monitoring Unit, CSIRO and Universities to source the best available information and ecological knowledge likely to have a bearing on its planning. The Molonglo planning process indicates that ACT PLA is not making best use of available information and expertise in and outside government, nor is that information used at the most effective time in the planning process, despite the best of intentions.
- (c) The timescale for the Molonglo development allows scope for the injection of ecological considerations to bring about adequate compromises in the interests of conservation. There is a need for strategic investment in research well in advance of the need to apply that knowledge in the planning process. ACT PLA needs to commit substantial investment in these strategic investigations and to seek advice on what investigations have the highest priority. The Wildlife Research and Monitoring Unit is in the best position to provide this advice. Its first approach on such an investigation has been rejected.

I suggest that ACT PLA needs to commit to substantial investment in research into the conservation needs of those species and ecosystems to be effected by the development. This is essential for planning the development, ameliorating its negative environmental effects and attenuating its positive natural environmental effects, in the interests of achieving the coexistence you spoke of at the round-table. A workshop on the priorities for research and other strategic investigations for the Molonglo development would be a good start.

Institute for Applied Ecology
Postal: University of Canberra ACT 2601 Australia
Delivery: University Ave, Bruce ACT 2616 Australia
Phone: +61 (02) 62015786 Fax: +61 (02) 62015305
Email: georges@aerg.canberra.edu.au
WWW: <http://aerg.canberra.edu.au>

- (d) We desperately need a biodiversity overlay added to the Territory Plan, so that the impact of particular developments on conservation values can be seen in a regional context rather than in isolation. This was a theme of representations made by the Nature Conservation and Namadgi Sub-Committee for many years, and the Wildlife Research and Monitoring Unit and the Government's advisory committees made considerable advances in generating a master plan and associated documents for the ACT. This environmental planning appears to be independent of the Territory Plan and so is not yet integrated into ACT planning. It needs to be (refer also item (b) above).
- (e) The ACT is coming under increasing pressure to release new land for housing, and this raises the broader issue of the impact of continued expansion of the suburbs and the footprint of Canberra on the natural environment. What has happened to the notion of sustainable growth, and maintaining the footprint of Canberra at current levels, or indeed reducing it, through thinking smarter on housing, on emissions, on waste and on transport? The continued encroachment of the suburbs on lowland native grassland and woodland ecosystems, such as is proposed by the Molonglo development, seems contrary to the thrust of current and prior governments to plan growth while maintaining or improving the state of the natural environment.

I would hope that your report would be couched in the context of these broader concerns, and to at some point confront the need for urban consolidation and high density options (European style) to dominate the process of urban sprawl in providing housing for Canberrans. If we do not do this, the pressures on the natural environment and lowland native grasslands will continue and the tyranny of 1000 cuts will continue to operate and extinction of some of the ACT's unique biodiversity will eventually result. This is not an outcome any of the parties at the roundtable would be wanting.

I hope these comments have been helpful, and I am sure that your timely investigation will make substantial inroads into what I have seen as progressive deterioration in the commitment to manage our native grasslands sustainably across the jurisdictions charged with their care.

Yours sincerely,



Arthur Georges,
Professor in Applied Ecology

Institute for Applied Ecology
Postal: University of Canberra ACT 2601 Australia
Delivery: University Ave, Bruce ACT 2616 Australia
Phone: +61 (02) 62015786 Fax: +61 (02) 62015305
Email: georges@aerg.canberra.edu.au
WWW: <http://aerg.canberra.edu.au>

Appendix A

Expertise

I have been involved in grassland research and management for many years, including

- Project leader on the ACTEW consultancy on the conservation needs of *Aprasia parapulchella*. This study, involving a masters and a PhD student, was instrumental in clarifying the distribution and abundance of this species, and placing the lower Molonglo development in context.
- Project leader on the consultancy let by ACT PLA on the conservation planning for Gungahlin grasslands. This study developed a set of guiding principles for injecting ecological considerations into the planning process, leading to satisfactory compromises in the interests of development and conservation.
- Supervised or co-supervised a range of postgraduate students working on grasslands fauna.
- Director of the Applied Ecology Research Group (1989-2005) which has been integrally involved in research of relevance to grassland management on a range of fronts, and which has produced graduates now involved in planning and decisions relevant to grassland in government and industry.
- Member of various government advisory bodies with relevance to grasslands, including the NRM Committee under its various guises (1996-present), chair of the Nature Conservation and Namadji subcommittee, and now chair of the Flora and Fauna Committee.

Institute for Applied Ecology
Postal: University of Canberra ACT 2601 Australia
Delivery: University Ave, Bruce ACT 2616 Australia
Phone: +61 (02) 62015786 Fax: +61 (02) 62015305
Email: georges@aerg.canberra.edu.au
WWW: <http://aerg.canberra.edu.au>

Appendix B

Complex Jurisdictional Arrangements

The first challenge arises from the complex jurisdictional arrangements that govern decisions on native grassland conservation.

Airport

Proposed developments on or adjacent to the airport include a northern access road to the Fairbairn precinct and a new taxiway. They all have the potential for significant and irreversible impact on the viability of the grassland habitat and its associated species and in other circumstances may well have triggered the EPBC Act as matters of national environmental significance. Recent proposals by Canberra International Airport to translocate (release at another site) threatened species or vegetation are not viable. The proposed translocations breach the principles identified by the scientific community for translocation in support of conservation objectives (for example, those identified by the Australasian Wildlife Management Society, <http://www.awms.org.nz/positionstatements/translocation.html>). Australia has a litany of examples of failed translocation exercises. The idea of translocating native grasslands, known to be severely compromised by a single ploughing, is not founded in science and is not feasible.

While the recent investment in research by the Airport is very welcome, the significance of the conservation issues at the airport have not to date been satisfactorily addressed by the Canberra International Airport or other responsible Commonwealth agencies. Neither the laws of the ACT nor those of the Commonwealth, appear to be having any influence on this matter, because land tenure and the Commonwealth Airports Act 1999 apparently has precedence over environmental legislation, and in particular the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). It would appear that the Airports Act is being used to discount any obligations to the wider community to ensure threatened species are protected.

I hope that one outcome of your investigation would be to strongly recommend that the ACT Government again bring this matter to the attention the Federal Minister for the Environment, given that there is a new Federal Government and a new Federal Minister with the environment portfolio. The ACT Government may further be encouraged to use the Canberra International Airport experience as an example in ongoing representations to the Federal Government by State, Territory and Local Governments on the unsatisfactory planning conflicts and outcomes arising from airport developments Australia-wide. I believe a clearer example could not be found, because this is one instance where not only are there unsatisfactory outcomes in a planning sense, but also serious negative outcomes from a conservation perspective.

I am unsure what incentives can be presented directly to the Canberra International Airport to meet our joint community obligations to conserve endangered grassland habitat. There is potential to protect and rehabilitate neighbouring areas or other areas regionally to compensate for some of the impacts in the immediate vicinity of the airport. Options to offset the impact of the Airport development by funding or supporting concrete initiatives elsewhere in the region do not seem to have been well considered. Such offsets could potentially lead to positive outcomes overall for grassland fauna and flora, and establish the Canberra International Airport as a good corporate citizen.

Institute for Applied Ecology
Postal: University of Canberra ACT 2601 Australia
Delivery: University Ave, Bruce ACT 2616 Australia
Phone: +61 (02) 62015786 Fax: +61 (02) 62015305
Email: georges@aerg.canberra.edu.au
WWW: <http://aerg.canberra.edu.au>

Not to explore such options is a lost opportunity for the ACT and, in terms of community perceptions of them, a lost opportunity for the owners of the airport. Perhaps such opportunities for concrete offsets could be identified by your investigation and brought to the attention of Canberra International Airport. Planning at this level would certainly be helped by a biodiversity overlay for the Territory Plan and a commitment by all land controllers to incorporate such an overlay into their planning processes.

Defence Lands

The recent attention attracted to native grasslands on Defence lands is another example of jurisdictional complexities leading to unsatisfactory outcomes.

The role of large grazing animals, such as eastern grey kangaroos is central to the functioning of grassland ecosystems and hence to the conservation of grassland biodiversity. Kangaroos should not be excluded from native grasslands. However current grazing pressure on the Defence sites is so high, exacerbated by the drought conditions, that structural attributes important for sustaining the ecosystem are being destroyed, with likely serious consequences for the persistence of the grassland dependent species and the conservation value of these remnants. We risk seeing the local extinction of some of these threatened species on Defence lands, in the context of a fragmented ecosystem that is endangered regionally.

There is general agreement amongst those who have studied these grasslands that urgent action by the Department of Defence is required to avoid serious degradation, and loss of species from those grassland remnants.

The Commonwealth Government's position on this issue has been consistent for more than thirty years – over abundant kangaroo populations need to be reduced and killing them is unavoidable. Commonwealth policies and codes of practice for the humane reduction of kangaroo numbers by shooting are readily available from their web site (www.environment.gov.au) and demonstrate that the Commonwealth Government is aware of all the complexities.

Yet the Department of Defence continues to procrastinate, some would say obstinately in the face of fairly intense pressure to act, and face damage to their reputation as a good environmental manager.

Clearly there are forces behind the scenes coming into play here, and again, I would hope that your investigation would lead to a recommendation that the ACT Government approach the Department of Defence to act in accordance with the expert scientific advice they have received, from the ACT, from the expert scientific consultants they have commissioned, and from within their own department, and proceed immediately to reduce kangaroo numbers and grazing pressure from the native temperate grasslands under their care. I believe that because of the nature of the non-evidential forces at play in this case, the impasse can only be resolved by direction the highest levels of Government, Federal and Territory.

Better Cross-jurisdictional Coordination

Both the Airport experience and the Defence experience serve to demonstrate the need for better communication and coordination across jurisdictional boundaries. The Limestone Plains Group has

Institute for Applied Ecology
Postal: University of Canberra ACT 2601 Australia
Delivery: University Ave, Bruce ACT 2616 Australia
Phone: +61 (02) 62015786 Fax: +61 (02) 62015305
Email: georges@aerg.canberra.edu.au
WWW: <http://aerg.canberra.edu.au>

recommended in its submission that the Commissioner explore possible frameworks for cooperative and coordinated management of all ACT lowland grasslands and grassland species through a stakeholder forum. As a member of the group, I strongly support this suggestion.

It seems to me though, that without a backing of this initiative at the highest political levels, immediate interests of individual stakeholders under the different jurisdictions will continue to dominate over the longer term collective concerns. It is for this reason I believe your recommendations should also include the formal approaches by the ACT Government to relevant Federal Ministers that I have outlined above.

Institute for Applied Ecology
Postal: University of Canberra ACT 2601 Australia
Delivery: University Ave, Bruce ACT 2616 Australia
Phone: +61 (02) 62015786 Fax: +61 (02) 62015305
Email: georges@aerg.canberra.edu.au
WWW: <http://aerg.canberra.edu.au>