

**Report on
Belconnen Naval Transmission Station (BNTS) Site as part of the
Investigations into ACT Lowlands Grasslands
by
Dr Maxine Cooper
Commissioner for Sustainability and the Environment.**

26 February 2008



**Ginninderra Peppergrass
(*Lepidium ginninderrense*)**



**Golden Sun Moth
(*Synemon plana*)**



**Perunga Grasshopper
(*Perunga ochracea*)**



**Belconnen Naval Transmitting Station (BNTS) January 2008
Natural Temperate Grassland**

Letter of Transmittal



**OFFICE OF THE COMMISSIONER
FOR SUSTAINABILITY AND THE ENVIRONMENT ACT**

ABN: 14 526 086 507

Jon Stanhope MLA
Minister for the Environment, Water and Climate Change
GPO Box 1020
Canberra ACT 2601

26 February 2008

Dear Chief Minister

On 15 November 2007 you directed pursuant to section 12(1)(b) of the *Commissioner for the Environment Act 1993* (the Act) that I conduct an investigation into the lowland native grasslands. The first part of my investigation has been focused on the native grassland at the Belconnen Naval Transmitting Station (BNTS) because it required urgent attention.

Pursuant to section 21(d) of the Act I provide you with a copy of my report on BNTS.

I intend to now continue with investigations into the other sites of lowland native grassland and will provide you with a report in due course.

Yours sincerely

Dr Maxine Cooper
Commissioner

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Summary of Commissioner's Recommendations

Recommendation 1 - Urgent action is to be taken to restore the ecological condition of the Grassland, and provide opportunities for the Perunga Grasshopper, Golden Sun Moth and Ginninderra Peppercreess to survive and thrive at BNTS.

Recommendation 2 – Kangaroos are to be removed immediately from BNTS to achieve a stocking rate of 1 kangaroo per hectare or less. This is to be done by the land manager, preferably before the end of April 2008, to prevent impacts on pasture biomass occurring during the dormant 2008 winter season.

Recommendation 3 – Kangaroo population numbers are to be maintained at the targeted level for the foreseeable future using fertility-controlled kangaroos only. A program to maintain this situation is to be implemented as needed. (This recommendation is made on the assumption that all remaining kangaroos at BNTS will be part of fertility control research programs.)

Recommendation 4 – Further reductions in the number of kangaroos at BNTS (i.e. even below the proposed stocking rate of 1 kangaroo per hectare) is to occur if recovery of the grassland does not improve over the next growing season even if research projects are compromised.

Recommendation 5 – Kangaroos are to be removed from BNTS by the most humane method suitable for that site having regard to advice from the AFP that firearms are not to be used at BNTS. (The Expert Panel has recommended sedating by darting followed by euthanasia by lethal injection.)

Recommendation 6 - The policy of the Conservator of Flora and Fauna, to the effect that translocation of eastern grey kangaroos is not an appropriate management technique, is to remain unchanged and that this policy position be confirmed to the Department of Defence immediately.

Recommendation 7 - The interim grassland management plan and interim kangaroo management plan for BNTS are to be completed by the end of August 2008, by the land manager, in consultation with key stakeholders. These plans are to adopt adaptive management principles and be based on a stocking rate of 1 kangaroo per hectare or less prior to the 2008 winter.

Recommendation 8 - Conditions at BNTS are to be reported on a quarterly basis to all relevant agencies and to the Commissioner's Office. The Commissioner is to establish an independent group to assist her evaluate progress and report on this in her annual report.

Recommendation 9 - A long-term grassland management plan covering BNTS is to be developed prior to the abutting Lawson lands being developed for residential purposes. This plan should incorporate clear management objectives and be based on an adaptive management approach to protect the Grassland, Perunga Grasshopper, Golden Sun Moth and Ginninderra Peppercreess at the BNTS. (The interim grassland management plan and interim kangaroo management plan (Recommendation 7) should be incorporated into the long-term plan. This long-term plan could cover all ACT natural temperate grassland areas.)

Recommendation 10 - The Territory is to ensure that legal measures are implemented to protect and preserve the high conservation value of the Grassland and its threatened species when the land at BNTS is transferred from the Commonwealth to another entity. (This recommendation is made on the assumption that Territory laws will fully prevail post the transfer.)

Recommendation 11 - The review of the Memorandum of Understanding between the Department of Defence and ACT Government (TAMS) is to be completed by August 2008.

Introduction

On 15 November 2007 the Minister for the Environment, Water and Climate Change, Jon Stanhope, pursuant to section 12(1)(b) of the *Commissioner for the Environment Act 1993*, directed that I undertake an Investigation into the lowland native grasslands. A copy of the Terms of Reference for the Investigation is at **Attachment A**.

On 21 November 2007 a meeting was held with key stakeholders for a roundtable discussion concerning relevant matters relating to the Investigation. Some stakeholders sought clarification regarding the scope of the Investigation particularly as to whether it would include threatened species.

On 29 November 2007 the Minister advised that:

Investigation of Lowland Native Grasslands their associated threatened communities and species, as well as threats to, and identification of measures for protecting these, and other species are an inherent part of the Terms of Reference.

Following receipt of this advice from the Minister, a Commissioner's comment was attached to the Terms of Reference. A copy of this document is at **Attachment B**.

A media release, from the Commissioner's office, advising of the Investigation and inviting submissions was issued on 30 November 2007. A copy of the media release is at **Attachment C**.

On 1 December 2007 an advertisement was placed in The Canberra Times that also advised of the Investigation and invited submissions. A copy of the advertisement is at **Attachment D**.

Both the press release and the advertisement advised that the time for lodging submissions relating to the Belconnen Defence site otherwise known as the Belconnen Naval Transmitting Station (BNTS) closed on 14 December 2007 and that the closing date for all other submissions was 25 January 2008. Early submissions on the BNTS site were required because the secure area within the BNTS appeared to require urgent attention. Accordingly, the first part of the Investigation focuses on this site.

Public submissions were received from a total of 12 community organisations and individuals in respect of the BNTS site although some of these submissions also dealt with issues associated with other sites. A list of these submissions is at **Attachment E**.

For the purposes of the Investigation a number of meetings with officers in the Department of Defence (Defence) including with the Secretary of that Department were held. Defence provided a high level of assistance and co-operation in respect of the Investigation. For example, the Department of Defence made available a number of documents relating to the natural temperate grassland within the BNTS and associated matters. In addition, the Department of Defence provided access to the secure area within the BNTS on a number of occasions so that the state of the natural temperate grassland could be assessed.

Officers of the department of Territories and Municipal Services (TAMS) provided information relevant to the Investigation and were also very helpful.

Belconnen Naval Transmission Station (BNTS)

BNTS is within the suburb of Lawson and occupies approximately 143 hectares of the northern portion of that suburb (**Map 1**). The existing suburbs of McKellar, Giralang and Kaleen and undeveloped Territory land to the South surround the site. The BNTS land has been declared National Land pursuant to section 27 (1) of the Commonwealth *Australian Capital Territory (Planning and Land Management) Act 1988* and is under the control of the Commonwealth Department of Defence.

The secure area of BNTS occupies approximately 115 hectares and it has a security fence running along its perimeter. The secure area of BNTS contains the majority of the site's natural temperate grassland (endangered ecological community under Territory and Commonwealth legislation) with some smaller areas outside the security fence on abutting Defence land. Within this grassland can be found the golden sun moth (endangered under Territory and Commonwealth legislation), ginninderra peppercress (endangered under Territory legislation and vulnerable and critical habitat under Commonwealth legislation) and perunga grasshopper (vulnerable under Territory legislation).

Natural Temperate Grassland

Natural temperate grassland is one of the ACT's most threatened ecosystems. It is estimated that 20,000 ha of natural temperate grasslands occurred in the ACT prior to European settlement. Only approximately 5% (1,000 hectares) of this grassland remains today. Nationally, less than 1% of this community remains¹.

Natural temperate grassland is a native ecological community that is dominated by native species of perennial tussock grasses. The dominant grasses are *Themeda triandra*, *Austrodanthonia* species, *Austrostipa* species, *Bothriochloa macra* and *Poa* species. The upper canopy stratum generally varies in height from mid-high (0.25 - 0.5 m) to tall (0.5 – 1.0 m). There is also a diversity of native herbaceous plants (forbs), which may comprise up to 70% of species present. The community is naturally treeless or has less than 10% projective foliage cover of trees, shrubs and sedges in its tallest stratum. In the ACT it occurs where tree growth is limited by cold air drainage, generally below 625 m¹.

Under the ACT *Nature Conservation Act 1980* the Minister for the Environment, on the recommendation of the Flora and Fauna Committee, has declared that the natural temperate grassland is an endangered community. The grassland is also listed as an endangered ecological community under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPCB).

The natural temperate grassland at BNTS has a botanical significance rating of 2². This means that the natural temperate grassland at BNTS has high botanical significance³. There are only three sites in the ACT, which contain natural temperate grassland, which has a high botanical significance rating and which are over 50 ha in size⁴. BNTS is one of these three sites⁵.

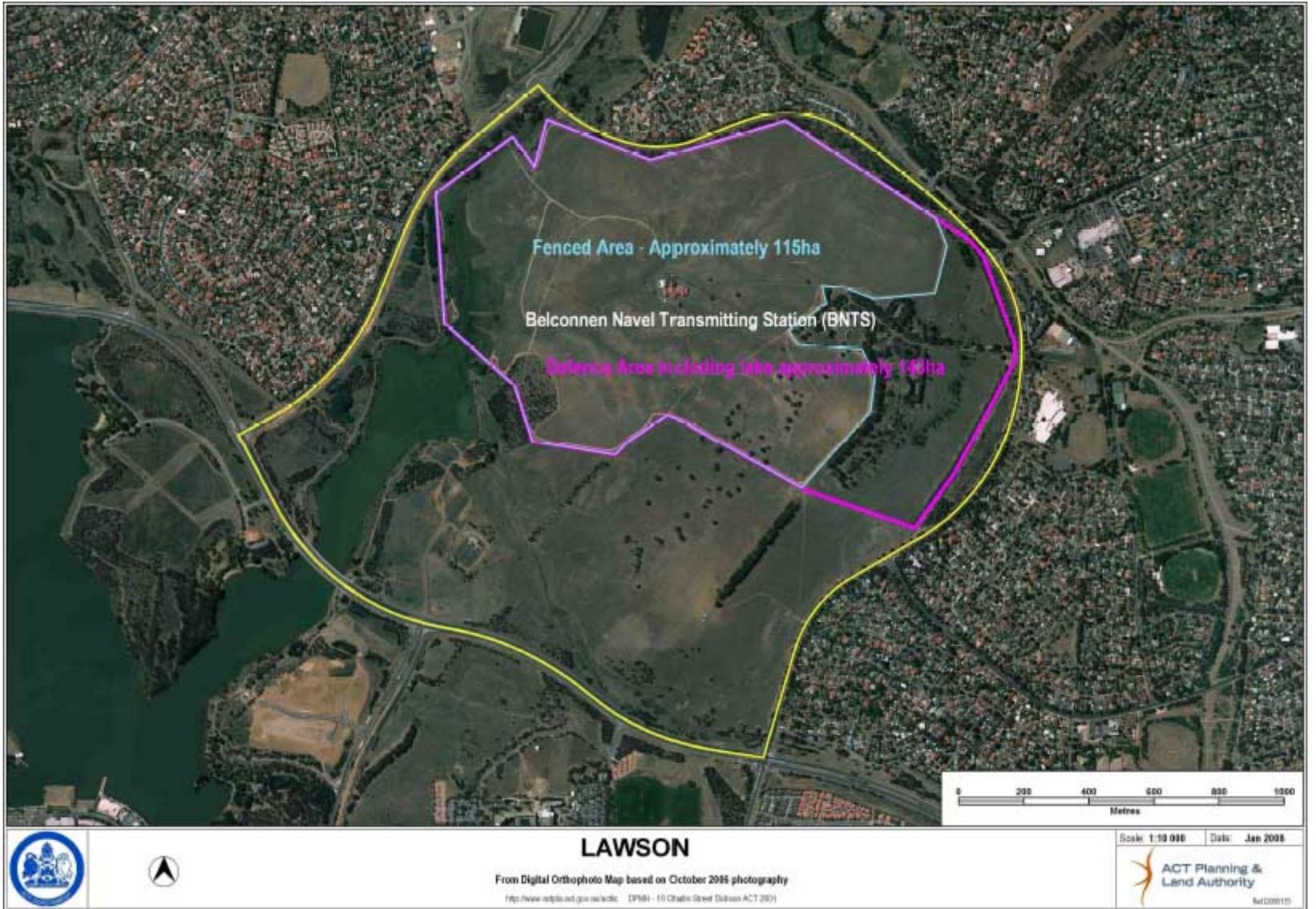
¹ ACT Government, 2005 *A vision splendid of the grassy plains extended: ACT lowland native grassland conservation strategy*. Action Plan No. 28 (Arts, Heritage and Environment, Canberra), paragraph 2.1.4

² *ibid* paragraph 3.4.6

³ *ibid* see table 3.1 and paragraph 3.4.6

⁴ *ibid* paragraph 3.4.6

⁵ the other two sites are the Majura Training Area and Mulanggari Nature Reserve



Threatened Species

At BNTS the natural temperate grassland is the habitat of the perunga grasshopper (which the Minister, on the recommendation of the Flora and Fauna Committee, has declared to be a vulnerable species), the golden sun moth and the ginninderra peppergrass (both of which the Minister, on the recommendation of the Flora and Fauna Committee, has declared to be endangered species). Another vulnerable species, the striped legless lizard, has been found outside the secure area; however, it was most likely present in the secure area at BNTS in former years.

Under the EPBC the golden sun moth is listed as critically endangered and the ginninderra peppergrass and striped legless lizard are listed as vulnerable.

Eastern Grey Kangaroos

Within the secure area of BNTS eastern grey kangaroos (kangaroos) are contained. As at 10 December 2007 there were approximately 588 kangaroos within the secure area.

Approximately 60 female kangaroos in this population are tagged and are being used for fertility research purposes. Of these 60 kangaroos, 40 have been subject to trial fertility control measures and the remaining 20 have been used as controls.

Issues

Within the context of the terms of reference for the investigation (**Attachments A and B**) the six critical questions in relation to the BNTS site appear to be:

- 1. Should the natural temperate grassland and the threatened species within the grassland at BNTS be conserved?*
- 2. What is the current state of the natural temperate grassland at BNTS?*
- 3. If the current state of the natural temperate grassland at BNTS is less than optimal, what is the cause?*
- 4. What action is necessary to conserve the natural temperate grassland and threatened species that have the grassland as their habitat?*
- 5. If action to conserve the natural temperate grassland requires removal of some or all of the kangaroos, what is the most humane method of removing the kangaroos within the constraints of the BNTS site?*
- 6. How should the natural temperate grassland be managed in the future so that it and the threatened species are conserved?*

Expert Panel

To assist in resolving the six critical questions related to BNTS, as outlined above, an interdisciplinary approach was considered desirable. To this end a panel of experts from different disciplines was formed. The expert panel consisted of:

- a plant ecologist who could advise me on the current state of the natural temperate grassland and threatened species that have grassland as their habitat (Dr Sue McIntyre);
- an expert in relation to kangaroos (Professor David Morgan);
- an expert in relation to animal welfare issues (Michael Linke); and
- a veterinarian experienced in animal research and animal ethics to provide practical advice in relation to animal management (Dr Andrew Braid).

A copy of the curriculum vitae for each of these experts is at **Attachment F**.

The expert panel met as a group on 25 January 2008 and on that day inspected the natural temperate grassland at BNTS. The expert panel was provided with a copy of all the submissions received in relation to the Investigation together with a number of other documents relevant to the issues identified above. The expert panel was requested to consider the six issues identified above and provide an interdisciplinary expert report.

Discussion and Commissioner's Recommendations

On 19 February 2008 the expert panel submitted its report which is at **Attachment G**. The expert panel's report, submissions listed at **Attachment E**, and material provided by the Department of Defence and Territory and Municipal Services have all been carefully considered in developing the recommendations presented in this report.

In forming my recommendations the intent of all the recommendations made by the expert panel is respected as has been the advice received from the ACT's Conservator of Flora and Fauna, Territory and Municipal Services (TAMS) (**Attachment H**).

1. Should the natural temperate grassland and the threatened species within the grassland at BNTS be conserved?

Reasons for conserving the natural temperate grasslands and the threatened species within the grassland at BNTS are presented in the expert panel's report (**Attachment G, pages 1 and 2**). Many of the submissions made to his investigation argued the importance of conserving the grassland at BNTS.

As previously mentioned in this report (page 8), the natural temperate grassland is one of the ACT's most threatened ecosystems with only 1,000 hectares remaining. The grassland at BNTS (approximately 115 hectares) accounts for 12% of the remaining grassland and importantly this is also considered to be of high botanical significance. This site is important due to the grassland and also the presence of threatened species. Species, by their very categorisation as threatened are ones that are offered legislative protection. Accordingly, the answer to question 1 is a categorical yes and is reflected in the first recommendation on page 13 of this report.

2. What is the current state of the natural temperate grassland at BNTS?

The expert panel undertook a field assessment of the site on the 25 January 2008 and concluded that despite recent rains the condition of the native temperate grassland over much of BNTS is still poor. Their analysis of the site is presented in some detail in their report (**Attachment G, pages 4 to 7**). I also visited the site with the panel and concur with their analysis.

The affect of over-grazing by kangaroos is well illustrated by photographs in the expert panel's report. These are reproduced on the following pages.



Figure 1. Kangaroo enclosure on right showing response to resting over spring/summer 2007-8. Area on the left continues to be grazed. In the centre of the picture is an eroded area with scalding between the tussocks. Note the growth response of this patch is limited even with grazing removal. This is due to the condition of the soil restricting rainfall infiltration and the phenomenon that short-growing, low productivity species are most persistent in eroded areas (January 2008).



Figure 2. Historical grazing pressure at the BNTS has resulted in dominance by low-growing species. Combined with continuing grazing pressure, these small plants have failed to produce good grass cover despite favourable growing conditions (January 2008).



Figure 3. Evidence of soil erosion: bare scalded areas between tussocks, individual tussocks remain raised while surrounding soil has washed away, leaving a lowered soil surface (January 2008).

Given the importance and condition of BNTS the expert panel recommended that urgent action be taken to protect the grassland and threatened species.

The expert panel's recommendation regarding this issue (**Attachment G, page 8**) is fully supported and is adopted as my first recommendation.

Recommendation 1 - Urgent action is to be taken to restore the ecological condition of the Grassland, and provide opportunities for the Perunga Grasshopper, Golden Sun Moth and Ginninderra Peppercress to survive and thrive at BNTS.

3. If the current state of the natural temperate grassland at BNTS is less than optimal, what is the cause?

The expert panel concluded that the cause of this is grazing pressure by eastern grey kangaroos (**Attachment G, pages 7 and 8**). They concluded that the *current dense kangaroo population is preventing recovery of the Grassland by impeding biomass accumulation, preventing re-colonisation by less grazing tolerant, more productive Grassland plants and preventing the re-establishment of a soil crust of cryptogams (mosses, algae and lichens) on the bare ground between the tussocks...As the current growing season tapers into autumn then winter, the impact of kangaroos on the Grassland is expected to increase substantially (Attachment G, page 8).*

4. What action is necessary to conserve the natural temperate grassland and threatened species that have the grassland as their habitat?

The expert panel recommended that there be *...immediate removal of all kangaroos from the BNTS and that this removal be completed before impacts on pasture biomass occur during the dormant winter growing season (Attachment G, page 9).*

The ACT's Conservator of Flora and Fauna (TAMS), has advised that complete removal of kangaroos is not considered necessary to facilitate grassland recovery, particularly if an adaptive management approach is used. This approach would involve the number of kangaroos

being adjusted according to prevailing conditions. The Conservator also indicated that the site is likely to recover if kangaroo numbers were at a level of approximately 1 per hectare (**Attachment H, page 4**). Currently the density of kangaroos is approximately 5 per hectare (588 kangaroos).

The Conservator highlighted the role of some kangaroos at BNTS regarding fertility control research. He argues that the BNTS site, particularly by being enclosed, offers opportunities not readily available at other sites (**Attachment H, page 2**). Research on kangaroo fertility is critical if kangaroo populations are to be managed so that ecological systems are protected concurrently with achieving a high level of animal welfare. The results of the research may provide all land managers with alternatives for managing kangaroo populations.

The option of accommodating research kangaroos on land immediately adjacent to BNTS was explored. These animals could have then been re-introduced to BNTS when the grasslands had recovered. As mentioned above, the Conservator did not consider it necessary to remove all kangaroos and was also of the view that such an approach could compromise research programs (**Attachment H, page 5**).

Taking into account the intent of the expert panel's recommendation and the information from the Conservator, the following recommendations are made:

Recommendation 2 – Kangaroos are to be removed immediately from BNTS to achieve a stocking rate of 1 kangaroo per hectare or less. This is to be done by the land manager, preferably before the end of April 2008, to prevent impacts on pasture biomass occurring during the dormant 2008 winter season.

Recommendation 3 – Kangaroo population numbers are to be maintained at the targeted level for the foreseeable future using fertility-controlled kangaroos only. A program to maintain this situation is to be implemented as needed. (This recommendation is made on the assumption that all remaining kangaroos at BNTS will be part of fertility control research programs.)

Recommendation 4 – Further reductions in the number of kangaroos at BNTS (i.e. even below the proposed sustainable stocking rate of 1 kangaroo per hectare) is to occur if recovery of the grassland does not improve over the next growing season even if research projects are compromised.

The expert panel made a recommendation ... *that all kangaroos re-introduced or dispersing into the BNTS must be subject to known and established fertility control measures and be incapable of breeding* (**Attachment G, page 12**). This only applies if all kangaroos were to be removed from BNTS. However if the site were to accommodate kangaroos other than those part of a research program, I would agree that those animals must be subject to known and established fertility control measures and be incapable of breeding.

5. If action to conserve the natural temperate grassland requires removal of some or all of the kangaroos, what is the most humane method of removing the kangaroos within the constraints of the BNTS site?

Submissions from the community indicated that this issue was of great concern to several groups. Accordingly, the expert panel's membership was biased towards people with animal welfare expertise.

The expert panel considered non-lethal and lethal methods (**Attachment G, pages 9 to 11**). They found that shooting is the most humane method. However, the AFP will not allow this method to be used at BNTS due to public safety concerns. The expert panel therefore

recommended that the kangaroos be removed from BNTS by sedating by darting followed by euthanasia by lethal injection. The Department of Defence (Defence) has advised that their contractor will be required to develop a specific method for capture darting. As part of this method, the contractor will be required to address animal welfare concerns including stopping work immediately if the kangaroos become stressed and there is to be a review of procedures if any kangaroos are injured during any stage of the procedure. I am also advised that there will be supervision by a qualified and experienced veterinarian at all times.

The expert panel also considered the alternative option of moving the kangaroos. The expert panel rejected this option because they did not consider that dart capture followed by release into the wild to be a better option.

In light of the opinion of the expert panel that dart capture followed by release into the wild is not a preferred option, it would therefore not be appropriate for any export licence to be granted to the Department of Defence.

Furthermore, it is understood that the Conservator of Flora and Fauna does not intend issuing translocation licences for the movement of kangaroos and that this is consistent with the policies stated in the first and third Kangaroo Advisory Committee reports. The Conservator has advised that the policy stated in these reports is as follows:

First Report: that translocation is not an appropriate management strategy for free ranging kangaroos in the ACT; and

Third Report: that although translocation can play a role in the conservation of threatened fauna, it is neither a humane nor an appropriate management technique for abundant species like eastern grey kangaroos in the ACT.

From discussions with officers in Defence it is understood that the option of moving the kangaroos to New South Wales is being explored. It would seem that this could not occur unless the Conservator of Flora and Fauna granted an export licence to the Department of Defence (see sections 48 and 104 of the Nature Conservation Act).

The panel's recommendation and the Conservator's policy regarding this issue (**Attachment G, page 11**) are supported.

Recommendation 5 – Kangaroos are to be removed from BNTS by the most humane method suitable for that site having regard to advice from the AFP that firearms are not to be used at BNTS. (The Expert Panel has recommended sedating by darting followed by euthanasia by lethal injection.)

Recommendation 6 - The policy of the Conservator of Flora and Fauna, to the effect that translocation of eastern grey kangaroos is not an appropriate management technique, is to remain unchanged and that this policy position be confirmed to the Department of Defence immediately.

The above policy includes the movement of joeys. However, I understand that a case can be, and in the past has been, put forward for exemption in exceptional circumstances. I therefore propose that the Conservator, on a case-by-case basis, consider any requests for exemptions.

6. How should the natural temperate grassland be managed in the future so that it and the threatened species are conserved?

From meetings with officers in Defence and TAMS, it is understood that Defence is currently developing a new management plan in consultation with TAMS, to protect the natural temperate grassland and threatened species at BNTS (grassland management plan). It is also understood that Defence, in consultation with TAMS, is also developing a kangaroo

management plan for BNTS. The management plan will be designed to provide a management strategy for the on-going management of the key natural values, in particular the natural temperate grassland and the threatened species. The kangaroo management plan will be integrated with the grassland management plan to ensure that on-going management of the natural values are sustainable and complementary.

It is also understood that Defence plans to divest itself of their 143 hectares of land at Lawson, including BNTS, around June 2009, and that the grassland and kangaroo management plans currently being developed are focused on assisting Defence in their land management activities primarily until that time. It is understood that these plans will not address issues such as community access or give guidance on the appropriate forms of abutting urban development. As the Lawson site is proposed for urban development in the short to medium term it will be important that a long-term management plan (incorporating a range of issue including kangaroo management and research) be developed as well as the shorter-term plans currently being prepared by Defence. This longer-term plan could cover all temperate grassland areas.

The expert panel has recommended that an adaptive management approach based on clear management objectives, expressed in a long-term management plan, be taken to protect the natural temperate grassland, perunga grasshopper, and golden sun moth and ginninderra peppercress at the BNTS. This plan would therefore be an extension of the plans that are currently being developed by Defence.

I strongly support the development of the grassland management plan and the kangaroo management plan for BNTS currently being prepared by Defence. These management plans are essential for ensuring that a holistic approach is taken to managing the kangaroos and conserving the natural temperate grassland and threatened species within the secure area at BNTS. However, they should be considered as interim plans and incorporated into a long-term management plan that explicitly addresses issues such as the role of BNTS in the long-term with respect to kangaroo research, community access etc. This should be done prior to the development of the Lawson site so that there is a clear understanding of the role and purpose of BNTS and the opportunities available to the community to support the protection of BNTS. Accordingly, the following recommendations are made.

Recommendation 7 - The interim grassland management plan and interim kangaroo management plan for BNTS are to be completed by the end of August 2008, by the land manager, in consultation with key stakeholders. These plans are to adopt adaptive management principles and be based on a stocking rate of 1 kangaroo per hectare or less prior to the 2008 winter.

Recommendation 8 - Conditions at BNTS are to be reported on a quarterly basis to all relevant agencies and to the Commissioner's Office. The Commissioner is to establish an independent group to assist her evaluate progress and report on this in her annual report.

If Recommendation 8 is adopted the members of the expert panel could be part of the independent group.

Recommendation 9 - A long-term grassland management plan covering BNTS is to be developed prior to the abutting Lawson lands being developed for residential purposes. This plan should incorporate clear management objectives and be based on an adaptive management approach to protect the Grassland, Perunga Grasshopper, Golden Sun Moth and Ginninderra Peppercress at the BNTS. (The interim grassland management plan and interim kangaroo management plan (Recommendation 7) should be incorporated into the long-term plan. This long-term plan could cover all ACT natural temperate grassland areas.)

Recommendation 9 respects the expert panel's recommendation on this issue (**Attachment G, page 11**). The long-term plan may require a cooperative effort between the current land manager and a future land manager given that BNTS may be under a different land manager as of mid-2009.

Given the importance of BNTS, the expert panel wished BNTS to be given a high level of legal protection (**Attachment G, page 13**). The panel understood that BNTS is to be transferred to the Territory. While this maybe the case I have worded my recommendation to accommodate a transfer to another entity.

Recommendation 10 - The Territory is to ensure that legal measures are implemented to protect and preserve the high conservation value of the Grassland and its threatened species when the land at BNTS is transferred from the Commonwealth to another entity. (This recommendation is made on the assumption that Territory laws will fully prevail post the transfer.)

Memorandum of understanding

In September 1998 a memorandum of understanding between the Department of Defence, the then Commonwealth Department of Environment and the then ACT Department of Urban Services (the Memorandum of Understanding) was signed. The Memorandum of Understanding appears not to have been terminated and therefore is still in operation.

Action Plan No. 28 called *A Vision Splendid of the Grassy Plains Extended*, made under the Nature Conservation Act, outlines conservation goals, objectives and actions for the natural temperate grassland and grassland dependent species including the threatened species of golden sun moth, ginninderra peppercress, perunga grasshopper and striped legless lizard.

The Action Plan provides for the Commonwealth and the responsible ACT Department (namely TAMS) to keep the Memorandum of Understanding under review⁶. I understand from meetings with officers in Defence and TAMS that steps are currently being taken to review the Memorandum of Understanding.

I strongly support a review of the Memorandum of Understanding and encourage an emphasis on the coordination and sharing of research activities, monitoring results and evaluations. It may also be beneficial to ensure that senior management in both organisations are routinely briefed with the same information on site conditions, research, progress etc.

An up-to-date Memorandum of Understanding is essential for ensuring that in the future there is effective communication, cooperation and concerted action by the Department of Defence and TAMS to conserve the natural temperate grassland and the threatened species that depend upon that grassland at BNTS.

Recommendation 11 - The review of the Memorandum of Understanding between the Department of Defence and ACT Government (TAMS) is to be completed by August 2008.

⁶ ACT Government, 2005 *A vision splendid of the grassy plains extended: ACT lowland native grassland conservation strategy*. Action Plan No. 28 (Arts, Heritage and Environment, Canberra), Table 4.1 under the heading Management