

CANBERRA ORNITHOLOGISTS GROUP
PO Box 331, Jamison Centre, ACT 2614

cogoffice@canberrabirds.com.au
www.canberrabirds.com.au



South Canberra Memorial Park, EPBC 2019/8595 – Request for Reconsideration of decision

The Canberra Ornithologists Group (COG) wishes to provide comment on this matter and provide our support to the Request for Reconsideration. We are a volunteer-based community group with around 350 members whose mission includes the conservation of native birds and their habitats. COG undertakes long-term surveys/monitoring of birds in ACTs woodlands and analyses data for trends. This includes a long-term bird survey program in Callum Brae Nature Reserve and the nearby Jerrabomberra West Nature Reserve. COG plays an active role in advocating for protection of native vegetation and bird habitats and for the mitigation of threats to and impacts on native birds.

The proposal should be reconsidered and determined to be a controlled action due to new information on impacts on matters protected by the EPBC Act, specifically in regard to the Swift Parrot, a listed critically endangered species. Impacts on the Swift Parrot were not considered in the original documentation in 2019, but substantial new information has since come to light on usage by Swift Parrot of the development site and the part of Callum Brae immediately adjacent to the proposed development area.

There is a good case that the environmental considerations, especially in light of recent records and knowledge, have not been given a sufficiently high level of importance or weight, including for the Swift Parrot. This includes the context of the proposed development within and adjacent to ecological communities which are critically endangered or endangered under national legislation (and ACT legislation), as well as landscape-scale considerations and cumulative impacts.

By way of background, there are reasonable arguments on the basis of environmental values and considerations to support the Block of land proposed for this facility (Crematorium) to be protected for the Swift Parrot and other woodland species, and added to the neighbouring Callum Brae Nature Reserve. There have been various views and positions on this over time, but the ACT Government Conservator of Flora and Fauna has acknowledged that, from an ecological perspective, the Block has values that are consistent with being included in the reserve estate.

If reservation or protection of the Block is not possible, then there should be strict conditions that ensure absolutely minimal impacts (direct or indirect) of the development on the adjacent nature reserve land; and that ensure no loss of mature eucalypts on the actual development site or road easement, which both contain Swift Parrot foraging habitat.

1. Known foraging habitat for critically endangered Swift Parrot

The land in question has known foraging habitat for the critically endangered, migratory Swift Parrot, which occurs in the Canberra region over autumn and winter months seeking foraging sources (flowering eucalypts, eucalypts in bud and eucalypts with lerp) at a number of now regular woodland patches or sites. Since the original EPBC determination, there are records of Swift Parrots feeding on eucalypts on the proposed development Block, and records of usage of the adjacent part of Callum Brae Nature Reserve by a large number of Swift Parrots. There are also records of Swift Parrots at the Jerrabomberra West Nature Reserve (woodland) a short distance away.

The woodlands in the area make up an important, native vegetation complex and movement corridor in central Canberra. This includes Callum Brae Nature Reserve which borders the proposed development Block, Jerrabomberra West NR and Isaacs Ridge NR nearby, and several treed private (leasehold) properties that link with these reserves.

- Expert researchers (Dr Deborah Saunders, Prof. Rob Heinsohn – Aust. National University) have concluded that ACT habitats are being used for foraging regularly by Swift Parrots over their wintering season, rather than only by Swift Parrots migrating through the ACT. This results in a higher level of dependence by Swift Parrot on food resources in the ACT to sustain the population. Specifically, this includes Callum Brae NR and the proposed development site which are an important part of this network of foraging habitats across the ACT.
- The expert researchers have also pointed to the importance of the loss of even small numbers or small patches of foraging trees for the critically endangered parrots, and the cumulative effect of many small losses over time. This underpins COG's view that no mature eucalypts, no trees of any size with records of use by Swift Parrots, and no trees providing potential foraging habitat for the parrots should be destroyed or removed.
- Evidence from Dr Laura Rayner, a Senior Ecologist, ACT Government with significant local research experience on threatened woodland birds, to the ACT Civil and Administrative Tribunal (22 April 2024), is also relevant. Dr Rayner's evidence and view supports statements by the ANU experts, and considering this expert opinion and likely impacts to Swift Parrots associated with the proposed development Dr Rayner is of the view that "... an alternate site is located for the development".

2. Potential for restoration

The Callum Brae Nature Reserve has borders with the proposed development Block. This reserve is an important remnant of the scarce Grassy Woodland endangered ecological community. The Block of land proposed to be developed is essentially the same kind of habitat, part of a Grassy woodland ecosystem, albeit with some altered understorey and weeds related to past use as a small zoo.

The significant potential for the Block to be restored and rehabilitated through landcare efforts (e.g. woody weed removal, ground weed management) has not been properly considered. This could be reasonably achievable through community efforts with support from the ACT Government. This option appears to have been dismissed for reasons related to resourcing, notwithstanding positive community support for the land to be incorporated in the nature reserve and restored and rehabilitated.

The ACT Government Strategies and Action Plans for endangered ecological communities such as Grassy Woodland, and for the protection of mature eucalypts, include restoration actions to improve condition and ecological function. This would be an appropriate, viable approach in considering a best outcome for the Block (and for the habitat of critically endangered Swift Parrots), fully protected within a reserve system and restored.

3. Access increases risks

Should the development nevertheless be allowed to proceed, this should be with the strictest conditions to protect environmental values. Specifically, in terms of minimising impacts and edge effects of the development on the adjacent Callum Brae NR, COG does not support any direct entrances to the nature reserve from the Crematorium site, such as footpaths or gates (understood have been proposed recently and not included in original EPBC Act referral documentation). Such access would add another dimension of people pressure and drive undesirable edge effects. Instead, there should be a suitable fence and signage that clearly delineate the protected status of the nature reserve, to discourage inappropriate access or use, and to deter vandalism and dumping.

In conclusion, allowing a zoo to be established on this Block some decades ago was a controversial decision without proper environmental scrutiny and opportunity for public input. With current ecological knowledge and understanding and relevant legislation, such an enterprise would be highly unlikely to be approved in this location. When the zoo was closed years ago, the land was left unoccupied with no active management of weeds, rabbits or other pests, and the environmental values allowed to further degrade. It would have been appropriate at that point for the ACT Government to have resumed the lease on the land. The result, however, was a lost opportunity to add the Block to the adjacent Callum Brae NR, and undertake its rehabilitation. Allowing a crematorium facility to now be developed on the Block perpetuates the historical mismanagement of this site adjacent to an endangered woodland community which is increasingly known to provide habitat for critically endangered species.

Jenny Bounds, Conservation Officer
For Canberra Ornithologists Group
18 August 2024