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Australian War Memorial re-development (Block 3/Section 39 Campbell) – National Capital Authority works approvals

The Canberra Ornithologists Group (COG) wishes to provide comments in response to the invitation for public input on this phase of the AWM re-development. The key area of concern to COG is the loss of a large number of eucalypt habitat trees used by various species of birds, as well as by other biodiversity.

The Canberra Ornithologists Group (COG) is a volunteer-based community group with around 400 members, with a mission that includes the conservation of native birds and their habitats. COG plays an active role in advocating for the protection of native vegetation as bird habitat, and for the mitigation of threats to and impacts on native birds.

COG is aware that the AWM re-development has been controversial in the community, with significant concerns raised, including some opposition to the re-development. COG also understands that the statutory environmental processes have been approved by the Commonwealth. However, in COG's view the significant cumulative impacts of the phased work program on the biodiversity values of the site have not been adequately addressed.

The AWM re-development site abuts, and is contiguous with, a large and important area of natural vegetation in the ACT reserve system, namely Mt Ainslie Nature Reserve and Mt Majura Nature Reserve. This woodland and dry forest is part of an identified natural wildlife corridor which extends from the Hall area at the north-east boundary of the ACT and includes the Mulligans Flat Nature Reserve and Woodland Sanctuary, as recognised in the AWM ecological report and assessment from Capital Ecology. It includes important areas of high-quality lowland grassy woodlands (Yellow Box/Red Gum), an endangered ecological community recognised in the ACT Native Woodland Conservation Strategy 2019, which supports habitat for eight bird species listed as threatened under the ACT *Nature Conservation Act 2014*, as well as several bird species also listed under the Commonwealth *Environmental Protection and Biodiversity Conservation Act 1999* (EPBC Act) and other rare or uncommon woodland birds. These birds require large, well connected woodland patches.

Of particular note is the occurrence of Swift Parrot (*Lathamus discolor*) in the Mt Ainslie/Mt Majura reserve complex. This species is listed as 'Endangered' under the EPBC Act and as a threatened species in each state and territory in which it occurs (NSW, Tasmania, Victoria, ACT, Queensland and South Australia).

Swift Parrot occur regularly in the woodlands of Mt. Ainslie/Mt Majura during autumn, winter and spring on their annual movements through mainland Australia. They commonly forage in large eucalypt trees on the lower wooded slopes. This area is regarded as one of the important ACT woodland habitats and foraging sites for the species:

- since 2004, Swift Parrot have been recorded in this area in around half of the years, with a maximum of 67 birds in March/April 2005, and some years numbers of 15-25 birds
- in the last few weeks, in April 2021, Swift Parrot have been recorded in this area, with up to 15 birds observed to date
- there are also records of Swift Parrots foraging in eucalypts in suburban gardens that directly abut these reserves, in the suburbs of Hackett and Ainslie.

The large, mature eucalypts on the AWM site are examples of the foraging sources used by these endangered parrots, providing resources such as lerps and other insects, flower buds and nectar. The National Recovery Plan for the Swift Parrot, published by the Commonwealth, identifies loss of habitat as a key threat, and considers it important to protect and manage a broad range of habitats to provide a range of foraging resources¹. This gives a sound argument for retention of the mature eucalypts on the AWM site, an issue that does not seem to have been adequately addressed in the AWMs environmental studies.

COG understands from the AWM documentation that removal of a large number of mature trees is proposed for the AWM re-development. It is not clear how many of the total number of the mature trees of all species assessed on the site will be removed, but appears to include 63 mature planted native trees and 6 naturally occurring mature eucalypts. Both the natural and planted eucalypt species would provide foraging resources for Swift Parrot. The loss of such a large number of trees in the geographical context of an important neighbouring reserve/wildlife corridor that provides habitat for an endangered bird is very concerning. COG therefore argues that the eucalypt vegetation contiguous with the reserve area should be retained. While the potentially impacted area is not large at a landscape scale, planning and development processes that take a site-by-site approach ignore cumulative impacts on bird habitats at the broader landscape scale.

COG is particularly concerned about any loss of the endangered woodland community identified on the AWM re-development site (however small that occurrence may be). We understand from the ecological report/assessment that fourteen (14) naturally occurring, mature eucalypt trees (Yellow Box and Apple Box) have been identified as having significant ecological values, but not all of these are proposed to be retained or protected. It is COG's view that ALL these mature eucalypts should be retained. The ACT Government has listed

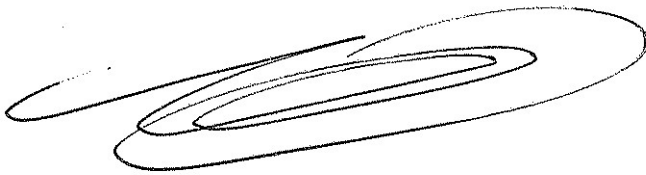
¹ environment.gov.au/biodiversity/threatened/recovery-plans/national-recovery-plan-swift-parrot-lathamus-dicolor

the loss of such trees as a threatening ecological process, and is developing an Action Plan to better protect these keystone natural resources.

COG recommends that the NCA review the proposed AWM work on the site as a whole, in order to minimise the cumulative losses of mature eucalypts, both the naturally occurring eucalypts (which should all be retained) and the individual planted eucalypts that have values for biodiversity.

COG can be contacted on cogoffice@canberrabirds.org.au.

Yours sincerely

A handwritten signature in black ink, consisting of several overlapping, elongated loops and curves, positioned below the text 'Yours sincerely'.

Dr Steve Read
Vice-President
Canberra Ornithologists Group

27 April 2021