LIMESTONE PLAINS GROUP

An alliance of ACT scientists and nature conservation groups advocating responsible and ecologically informed management of grassy ecosystems in the ACT and region

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22 September 2008.

Committee Secretary
Senate Standing Committee on Environment, Communications and the Arts
Department of the Senate
PO Box 6100
Parliament House
Canberra ACT 2600
Australia

Dear Committee Secretary,

I offer the following submission to the 'Inquiry into the operation of the Environment Protection and Biodiversity Conservation Act 1999'.

Heading b.

The Act has been ineffectual in protecting the two best remaining areas in the ACT of the listed threatened community *Natural Temperate Grassland of the Southern Tablelands of NSW and the Australian Capital Territory* (NTG) from overgrazing by eastern grey kangaroos. I refer to the Defence land at the Belconnen Naval Transmitting Station (BNTS) and the Majura Training Area (MTA).

The Department's acceptance of advice that this process (overgrazing by eastern grey kangaroos) did not constitute an 'action' under the Act rendered the Act impotent, at a time when the refusal by the Department of Defence to manage this listed threatened community for conservation was continuing to exacerbate the poor condition of these grasslands, and leading to a loss of vegetation structure and a diminution of species richness. Six listed threatened grassland plant and animal species occur on these two sites and they have all been further endangered by continuing poor management by Defence (Appendix 1), along with nine woodland species in the threatened *White Box – Yellow Box – Blakely's Red Gum Grassy Woodland and Derived Native Grassland* community at the MTA.

Heading g.

The Department has not been prepared to pay for the quality of advice required for biological consultants to prepare expert advice for prospective EPBC Act cases. As a result, few experienced biologists are prepared to take on this sort of work.

Yours sincerely,

Ms Isobel Crawford Co-convenor, Limestone Plains Group.

Appendix 1.

Listed threatened species and communities recorded from the Belconnen Naval Transmitting Station and/or from the Majura Training Area.

The following threatened communities (2) and species (15) have been recorded from grassland and grassy woodland at Belconnen Naval Transmitting Station (BNTS) and/or the Majura Training Area (MTA).

common name	scientific name	national	ACT	BNTS	MTA
		status	status		
Natural Temperate	An ecological community	Е	E	Y	Y
Grassland	of many species				
Yellow Box – Red Gum	An ecological community	CE	E	N	Y
Grassy Woodland	of many species				
Canberra Spider Orchid	Arachnorchis actensis	Е	E	N	Y
Ginninderra Peppercress	Lepidium ginninderrense	V	Е	Y	N
Button Wrinklewort	Rutidosis	Е	E	N	Y
	leptorrhynchoides				
Damana Casalana	D 1		V	X 7	₹7
Perunga Grasshopper	Perunga ochracea	G-F	<u> </u>	Y	Y
Golden Sun Moth	Synemon plana	CE	Е	Y	Y
Striped Legless Lizard	Delma impar	V	V	Y	Y
Grassland Earless	Tympanocryptis	Е	Е	P	Y
Dragon	pinguicolla				
Brown Treecreeper	Climacteris picumnus		V	N	Y
Hooded Robin	Melanodryas cucullata		V	N	Y
Superb Parrot	Polytelis swainsonii	V	V	N	Y
7 d 11 11 1	. 1 11 1 4 1 66 4 1	. 12 - 41 - 1	1		
	ecies less likely to be affected	directly by			37
Varied Sitella	Daphoenositta		V	N	Y
Daintad Hanayaatar	chrysoptera		V	N	Y
Painted Honeyeater Swift Parrot	Grantiella picta	E	V	N	Y
	Lathamus discolor	E			l .
White-winged Triller	Lalage sueurii		V	N	Y
Regent Honeyeater	Xanthomyza phrygia	E	E	N	Y

Legend:

Conservation status:	Y = recorded		
CE = Critically Endangered (Used only by Commonwealth)	N = not recorded		
E = Endangered	P = presumed present		
V = Vulnerable	previously (suitable habitat		
	available)		