

SYDNEY COASTAL COUNCILS GROUP Inc.

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28 October 2004

The Director General
C/- Bitou Bush Threat Abatement Plan Co-ordinator
Pest Management Unit
Parks and Wildlife Division
Department of Environment and Conservation (NSW)
PO Box 1967 (43 Bridge Street)
HURSTVILLE NSW 2220

ATT: Director General

RP065-04

Dear Sir / Madam,

Re: *Draft Threat Abatement Plan for invasion of Native Plant Communities by Bitou bush/boneseed.*

1.0 INTRODUCTION

Thank you for providing Sydney Coastal Councils Group (SCCG) an opportunity to comment on the proposed *Draft Threat Abatement Plan (TAP) for invasion of Native Plant Communities by Bitou bush/boneseed*. SCCG commends the Department on the preparation of the Draft Bitou TAP.

The invasion of bitou bush on Sydney coastal environments is of concern to SCCG member councils including Sutherland, Rockdale, Botany, Randwick, Waverley, Manly and Warringah. The control of Bitou Bush has also represented a major financial cost to those councils in recent years.

2.0 SPECIFIC COMMENTS

SCCG seeks further clarification on the identification of "priority sites" under the TAP. Does a priority site include factors including but not limited to:

- Flora and fauna populations;
- Habitat corridor linkages;
- Biodiversity;
- The impact of control mechanisms on surrounding ecosystems / environments;
- Community perceptions;
- Land value; and
- Potential affects of climate change on coastal ecosystems;

SCCG encourages DEC and other agencies involved with the preparation of the TAP to consider and involve where necessary, input from local councils, local community groups and other local land managers in identifying "priority sites". Incorporating local experience and knowledge will allow a more holistic and integrated approach to the identification and management of priority sites.

¹Sydney Coastal Councils Group award winning project "Protecting Sydney's Wetlands" funded by the Australian Commonwealth Government - Coast and Clean Seas. Copies of this document are available from Sydney Coastal Councils Group.

Action 1.1

SCCG agrees with Action 1.1 but would like further clarification as to what are the roles and responsibilities between State and Local Government, particularly where Bitou Bush priority zones lie adjacent to non-priority zones.

SCCG are of the opinion that both councils and community groups should be given the opportunity to comment on what should be included in the definition of a "priority site". Local volunteer community groups and land owners can provide DEC and other agencies with local knowledge that is often overlooked in the draft of state wide abatement plans. SCCG considers it paramount that comments from land owners and local communities are seriously considered and implemented into the TAP where appropriate.

Action 1.3

SCCG commends DEC for encouraging the input of indigenous communities in developing site-specific management plans. SCCG would encourage local indigenous communities communicating with local councils when developing site specific management plans regardless of the site being listed as a priority site.

Action 2.1

Councils should be directly involved with the nomination of priority sites based on experience of local residents and community consultation.

Action 2.2

Research information should be disseminated to local land managers for the purposes of assisting in the evolution of ongoing land management strategies and action plans. Research results such as those on the affects on herbicide spraying should be clear and easily understood so the communication barrier between science and the public is reduced. This point also applies to Action 3.1, Action 6.1 and Action 7.1

Action 2.3

DEC must ensure that any surveying exercises of bitou bush and boneseed infestations involve and work in association with local councils and community groups to identify and incorporate information. This process will avoid any potential duplication of research work and streamline the survey assessment process.

Action 4.2

In undertaking public awareness programs DEC and other agencies must ensure that the best possible methods to inform and educate people on how to manage bitou bush on private lands is addressed within the TAP and at community forums.

SCCG encourage incentives for private land owners who carry out best land management practices of bitou bush.

Objective 8

SCCG are of the opinion that the two objectives outlined under Objective 8 (8.1 and 8.2) provide DEC and other agencies be provided to ensure that control programs and research projects based on the outcomes of the TAP are in consultation with local land management officers and community groups.

OTHER COMMENTS

- Could DEC confirm with SCCG whether the spatial distribution of Bitou Bush within the Sydney coastline is available for assessment by SCCG member councils. If not, does DEC plan on producing a map to assist SCCG member councils with the management of Bitou Bush and Boneseed. Could SCCG assist DEC with producing a Bitou Bush spatial distribution map encompassing the entire SCCG region?
- On page 28 paragraph 1, it should read four endangered ecological communities not eight as written.

3.0 CONCLUSION

I trust that these comments and recommendations will receive appropriate attention when finalising the submission for the proposed listing for saltmarsh as an endangered ecological community. If you wish to clarify any matter in the submission or require further information, please contact the Group's Coastal Projects Officer, Richard Phillips on 9246 7702 or email on the following address, richard@sydneycoastalcouncils.com.au

Yours Sincerely,

Richard Phillips
Coastal Projects Officer
