



The Conservator of Flora and Fauna
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Dear Conservator

Draft Action Plan to Prevent the Loss of Mature Native Trees

The Tuggeranong Community Council welcomes the opportunity to provide feedback to the Conservator of Flora and Fauna on the Draft Action Plan to Prevent the Loss of Mature Native Trees and the proactive approach to the protection of mature native trees (MNT)

The loss of 6.2% of our mature trees in only 5 years, between 2015 and 2020 because of greenfield development is a bad reflection on current government policy, in view of the woodland strategy and the listing of Box Gum Woodland as critically endangered.

These trees are of immense value

- Providing nesting habitat and support connectivity across the landscape.
- Contributing to soil conservation, water and air quality, nutrient cycling, and carbon sequestration.
- Promoting pest management by providing habitat for insectivores e.g. bats and birds.
- Providing foraging/shelter sites for ground-dwelling animals and diverse invertebrate populations.
- Contributing to socio-economic wellbeing by improving mental health for residents in cities, providing shade, mitigating 'heat island effect', and increasing residential property prices.

However, we are concerned and want the assurance that when future urban areas are planned that there is:

- Early identification and mapping of mature native trees prior to planning commencing.
- Requirements to keep MNT and only remove trees as a last resort.
- Tree retention and recruitment plans for new development areas prior to submitting the development application
- Mandatory percentage targets for the retention of trees in greenfield developments

There should be a clear timeline within the Draft Plan and all research data should be made available to all. Also, the government must ensure there are adequate funds to ensure necessary actions of the Draft plan are completed and are appropriately resourced.

There must be a strict registration of trees:

- Register all naturally occurring trees over 100 cm DBH as 'exceptional'.
- Ensure all registered and exceptional trees and their habitat are protected prior to any planning proposals
- Identify transparent criteria to ensure the penalty cost of illegal removal of such trees is high and a better compliance outcome is achieved.
- Develop conservation management plans and ensure they are implemented to protect mature native trees and their habitat within the urban landscape.
- Provide financial and logistical assistance to lessees to ensure areas are managed to improve recruitment and protect existing mature trees and associated biodiversity.
- Involve community in citizen science actions including survey and monitoring of threats and recruitment and ensure that the data are collated and maintained

We are also concerned about how the plan will work as it is not clearly identified in the proposal. It will need cooperative land planning and management to consider the requirements needed for conservation.

The draft action plan is very comprehensive, however lacks information how the plan will be implemented within specific timelines.

We recommend the inclusion of such timelines and priority actions for implementation to assess whether the Action Plan is achieving its objectives.

We thank you for the opportunity to provide some comments into the draft Action Plan to Prevent the Loss of Mature Native Trees.

Yours sincerely,



Jeffrey R Bollard
President

27 May 2022