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Dear Matt,

**Invitation to comment on the potential listing of a threatened ecological community –
Lowland Native Grasslands of Tasmania**

Thank you for the opportunity to comment on elements of the listing advice and draft conservation advice for the above ecological community.

As a co-author of the original nomination the TCT is pleased to see that the extraordinarily long process of assessing this highly valuable community is close to being completed.

While we are not given an opportunity to comment on whether the community is being recommended for listing (we are left to assume that this is the case) and if so what category it is being recommended, we wish to repeat comments regarding its importance in the Lowland Native Grasslands of Tasmania Listing Advice that:

“The remnant Lowland Native Grasslands of Tasmania is regarded as one of Tasmania’s most threatened and fragmented ecosystems (Zacharek et al., 1997; Kirkpatrick et al., 1988; Harris and Kitchener, 2005) and the most depleted vegetation formation in Tasmania (DPIW, 2006). In 2008, the lowland native grasslands are not listed as a threatened vegetation community under the Tasmanian Nature Conservation Act 2002.”

In light of these comments we urge your department and the Minister to proceed with listing this community with all haste.

Our only major concern is regarding the condition thresholds defined in the Lowland Native Grasslands of Tasmania Listing Advice and we recommend against their use for this ecological community.

We have four reasons for opposing the use of condition thresholds for this community.

1. Condition should not be part of the listing process: We oppose the decision to use condition thresholds to exclude “Significantly degraded areas”. In defining an ecological community for listing it is not appropriate to exclude the most degraded or threatened parts of that community and only issues of conservation value must be considered. Issues of condition, viability and potential for rehabilitation are best dealt with after listing during the recovery planning process when sites are prioritised for management.

2. Valuable areas of grassland will be lost: Applying condition thresholds that exclude many parts of this ecological community will result in many remnants with significant conservation values not being protected and this may lead to them being lost through land clearing, grazing etc. It is hard to estimate the total area or proportion of Lowland Native Grasslands of Tasmania that will not be protected but the document Lowland Native Grasslands of Tasmania ecological conservation advice emphasizes that most of the community is present in small remnants. It states:
“In 2008, the ecological community occupied an area of approximately 21 600 ha but is highly fragmented. Remnants range in size from <2.5 ha up to 1000 ha, however most patches (approximately 80%) are under 10 ha in size and almost all (approximately 98%) are under 100 ha (DPIW, 2008).”

3. Listing may trigger destruction of grassland: Not only will many important areas of this community miss out on protection, some land owners may take action in response to the listing to ensure their ‘unlisted’ remnants are not rehabilitated or improved to the point where they will meet the condition thresholds.

4. Condition thresholds difficult to apply: The other reason we opposed the proposed condition thresholds is that they are very complicated and will be very difficult to apply on the ground. The objective criteria will be hard to measure on the ground and it is possible that a single grass tussock or tree may be the difference between meeting and not meeting the thresholds. Measuring the thresholds may require costly technical assistance and disputes and legal action are likely to arise. The additional features are highly subjective and will only exacerbate these difficulties and increase the potential for legal action. It would be much more efficient and simpler for land owners to list all grasslands and then apply the condition thresholds including the additional features when prioritizing sites for management or assessing applications for permits to destroy or damage.

We hope that you will take these comments into account.

Yours sincerely,

Peter McGlone
Acting Director