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A New Export Market?



The Tasmanian Conservationist is the regular newsletter of the Tasmanian Conservation Trust Inc, 102 Bathurst Street, Hobart, Tasmania 7000. ABN: 63 091 237 520
Phone (03) 6234 3552 Fax: (03) 6231 2491
email: tct@southcom.com.au
website: <http://www.tct.org.au>

Director: Michael Lynch
President: Geoff King

The views expressed in this newsletter are not necessarily those of the Tasmanian Conservation Trust Inc (TCT) .

Editor: Michael Lynch

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Contributions: We encourage our readers to submit articles of interest for publication. Articles should preferably be short (up to 600 words) and well illustrated. Please forward copy on computer disk or by email if possible. Guidelines for contributors are available from the TCT office. We reserve the right to edit contributions.

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North-West Branch Tasmanian Conservation Trust

Meetings of the North-West Branch of the TCT are held on the first Wednesday of each month at 12 James Street, Ulverstone from 5pm to 6pm. All members resident in the north-west are invited to attend all or some of these meetings to discuss conservation issues in the region.

Writing

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Reports and management plans,
newsletters and magazine articles,
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BA (Hons) Literature
Member of Society of Editors (Tas),
Tasmanian Writers' Centre, Society of Authors.
ABN 86 028 924 992
Phone (03) 6234 6569
Email jbird@southcom.com.au

One step forward...

two steps back

the commercial harvest of native wildlife

Undoubtedly one of the most contentious issues that any conservation group has to deal with is the commercial utilisation of wildlife. The TCT has for many years attempted to provide a reasoned perspective on various proposals to harvest native Tasmanian animals, from seahorses to possums. Such input is rarely welcomed and even more rarely taken on board, even though the TCT usually works to minimise conservation and animal welfare impacts rather than stop such proposals entirely.

In May, a new chapter on this issue was opened with the release of two draft wildlife management plans for the commercial harvest of wallabies and pademelons on King and Flinders Islands. Authored by the Nature Conservation Branch of DPIWE, these plans spring from previous failed attempts to address the wallaby 'problem' on these islands by creating a wallaby meat export industry. In early 2002, an appeal by the TCT and the Humane Society International to the Administrative Appeals Tribunal on a similar proposal resulted in an agreement (known as the Whitemark Agreement) with the Australian and Tasmanian Governments on how this difficult issue might move forward. We had hoped that these latest plans would take into account the Whitemark Agreement, but unsurprisingly, this has not been the case.

Much of the detail of the Whitemark Agreement focused on pinning down how the density of native animal populations should be measured, and identifying appropriate management responses to such densities. It was also clearly articulated that this would be underpinned by comprehensive reporting with transparent methodology. For example, the Whitemark Agreement states the following in regard to reports used to justify quota levels:

'These reports should include as a minimum:

- the current index of abundance for each region, including comparisons with all historical data;
- number of crop protection (spotlight shooting and 1080 poisoning) permits issued by region each year, including comparisons with all historical data;
- the amount of 1080 applied by region each year;
- number of animals, by species, killed each year, by region and method (crop protection – spotlight shooting, crop protection – 1080 poisoning, and commercial take);
- compliance activities undertaken during the reporting period; and
- details of the source materials.'

The latest draft management plans fall far short of these fairly reasonable criteria. They do not include details of the number of crop protection permits issued (only numbers of animals killed) or the amount of 1080 applied (just permits issued). Further, they do not actually provide any information on compliance activities that have been or will be undertaken, simply information on the regulations that are applied.

Such information is particularly relevant when considering the widely publicised and massive 1080 baiting operation that took place on King Island in late April, which even landholders admit would have killed 'tens of thousands' of wallabies. It would seem absolutely ridiculous to allow a commercial culling operation without an assessment of the impact of this operation.

Through the hard work and networking of Suzy Manigian, our submissions to the Australian Department of Environment and Heritage (who must approve these draft wildlife management plans) were also signed by the Humane Society International, Against Animal Cruelty Tasmania, World League for Protection of Animals, Australian Wildlife Protection Council and Quaker Concern for Animals. All that we can do now is hope that common sense will prevail.

Craig Woodfield

A Thank-you to Members

Thank you to all our members who gave so generously to the appeal for donations to coincide with the end of the financial year.

The Committee, Director and staff thank all members for their continued support and encouragement of the TCT.

Thanks for the Memories

*This is the last article I shall write for
The Tasmanian Conservationist
as Director of the TCT.
Luckily the publication of this issue
coincides with the Annual Report
and so my Director's Report for
the AGM appears below.*
Michael Lynch

This will be my last Director's Report. I shall be retiring from the TCT in early September after twelve and a half wonderful years. For the moment, at least, I have no plans for the future except that whatever plan might come along will always include living in Lower Snug. Cassandra and I are travelling to England, France, Ireland and Scotland on September 6 for about a month to see our eldest grandchild for the first time and for Cass to attend conferences and continue her research.

Annual Reports have traditionally been the place where one can read a summary of the year's activities and wonder at the huge amount of work our small organisation gets through. For my twelfth and final report I would like to do things a little differently. Firstly I would like to reflect on the issues that the TCT was dealing with when I took over the position in May 1993 and whether we can claim success or otherwise in the intervening period. Secondly I would like to highlight what I believe to be the most serious problems facing the future of land-use planning in Tasmania – the demise of the Resource Management and Planning Appeal Tribunal.

Suzy Manigian and I took over as joint Directors in May 1993, just in time for the publication of issue no. 232 of *The Tasmanian Conservationist*. The report on current issues in the newsletter included the following:

- The ongoing legal case against the proposed King Cole development on the site of the Red Cross building opposite the Royal Hobart Hospital. The judge hearing the case had raised several obscure points of law that nobody had thought of previously and the hearings were adjourned for several more months. Most members would know that eventually we were successful in stopping this hideous development.
- Outrageous claims from the Tasmanian Traditional Recreational Land Users Federation (TTRLUF) – remember them? – that the draft Walking Track Management Strategy for the World Heritage Area was no more than a plot to remove all traces of European civilisation from the WHA. Possibly one of Simon Cubit's more preposterous outbursts.
- A far more level-headed approach from the TCT contained in our submission to the Parks and Wildlife Service on the draft Walking Track Management Strategy. Sadly the development and implementation of the strategy, in my view, went totally off the rails and we are yet to see a comprehensive approach to walking track management in the WHA.
- Our appeal to the then Environment Protection Appeal Board over the granting of a licence by the

Department of Environment and Planning for a sewage treatment facility at the proposed 'wilderness lodge' at Lake Lea. Thankfully the 'wilderness lodge' never eventuated, although the land surrounding this stunningly beautiful lake is still privately owned and it is still possible that another hare-brained scheme might be forthcoming.

- The Mount Wellington broadcast tower and the news that the Hobart City Council had insisted that the taller of the two design options be constructed.
- A new study conducted on behalf of the TCT had identified the impacts of horse-riding on various vegetation types on the Central Plateau. The major surprise from the study was the sensitivity of shrubland to trampling by horses. The woody plants are broken by the horses' hooves and soil erosion is initiated. The report put to rest once and for all the myth that horses had little or no environmental impact and its findings had major implications for the management of the Central Plateau.

Predictably there was a report on imminent logging of the forests of the Huon and Picton catchments which stated that the then Forestry Commission was planning to push roads further up the Huon Valley towards Blake's Opening. This would reduce the remoteness of key parts of the Southwest Wilderness, make redundant a large section of the Huon track and destroy forests that had never been logged, the report claimed.

Under the heading 'SLAPPS – strategic lawsuits against public participation – a cautionary tale' I reported on two examples from Canada which I had become aware of during a recent visit. One involved a law suit initiated by MacMillan Blodel (of Wesley Vale pulpmill fame) on Galiano Island in the Georgia Strait between Vancouver Island and mainland British Columbia and the other on northern Vancouver Island itself. Little did we know what John Gay would be planning over a decade later.

Suzy Manigian reported on the launch of the TCT and Threatened Species Network Nature Guarantee legislative proposal discussion paper. The TCT called for comments on the discussion paper to inform the preparation of a private member's bill to be introduced into Parliament by Peg Putt later in the year.

Peter McGlone reported that, after years of constant pressure from the local community about the stench problem at Orielson Lagoon and the occurrence the previous summer, for the first time, of a blue-green algal bloom, the State Government had responded to the problem. They employed Kinhill Engineering to develop a remediation plan which would combat the stench problem

while maintaining, and even enhancing, the values of this internationally significant wetland as a habitat for water fowl. The government stated that it planned to delay any decision on the reservation of Orielton or Pittwater until after the rehabilitation was dealt with.

Peter finished his article as follows: 'We still have hope that the 20 year campaign to protect Orielton will soon be over, but my guess is that a shortage of funding will cause the State Government to act, but act very slowly.' Very slowly is hardly the word for it!

Remember this was written in May 1993. Nearly six and a half years later, in October 1999, the Draft Management Plan for Pitt Water/Orielton Lagoon Ramsar Site (including the Pitt Water Nature Reserve) was issued for public comment. The TCT prepared a less than complementary 44-page submission on the draft plan in November 1999 and quick as a flash nothing happened; and nothing happened; and nothing happened.

As anybody that takes an interest in such matters would well know, we are still waiting for the management plan, twelve years since Peter wrote his article.

In my humble opinion the most interesting article in *The Tasmanian Conservationist* in the month I began as Director was another by Peter McGlone entitled 'Can the Green Movement Rise From the Ashes'. An extract: 'My point about cricket is not that it is a parable on [sic] life generally (though some days we feel we are always batting on a sticky wicket), but there is a problem when almost every greenie I speak to either doesn't understand the game, or worse, totally ignores it while the rest of the country is obsessed with the game. To a great extent it is those games such as cricket, football, four wheel driving and duck shooting that give many Australians a reason to keep going until the next weekend. If the green movement is going to succeed in changing attitudes and values towards the environment in our society, they have a problem because many greenies don't understand the society they are attempting to change. Right or wrong, these activities are a big part of the lives of many Australians. I am greatly disturbed that being a greenie appears to involve having an abhorrence of all of these activities. If this is so then it implies that you cannot be an ordinary Australian and be a greenie.'

As I sit here writing this article, like many Australians I am lamenting the fact that the Wallabies lost two of the games they play in heaven in a row in South Africa, whilst I wait for the second cricket test to get under way in Edgbaston. Peter is right – cricket and rugby have a proper place in conservation newsletters and if I were really pushed there could even be a place for the AFL. And to prove the point, Peter suggested what all of his readers could do to stop test cricket becoming extinct: write to the Minister for the Environment, Arts and Sport (Ros Kelly as it was then) urging her to immediately implement a recovery plan for test cricket. Recommend to her that such a plan take an holistic approach and integrate the future of cricket with protection of the environment. This could be achieved, he proposed, through a policy to ensure that no child should be without a cricket bat by 1997. The government could do this by providing a rebate on the purchase of a cricket

bat to all low-income earners. This would spur a revival in the demand for willow and thus remove one of Australia's most devastating environmental weeds.

Sixty-eight editions of *The Tasmanian Conservationist* later, it is time to move on. I do so with one major regret and that is the failure of the Resource Management and Planning Appeal Tribunal to act in the way that Parliament intended when it introduced the legislation establishing the Tribunal, and the resultant failure to fairly allow the Tasmanian community to participate in the Resource Management and Planning System.

The Tribunal has lost its way. As long ago as April 1997, the Edwards Review of the State Planning System had this to say about the Tribunal:

'Some criticism has been levelled at the role of lawyers in the Tribunal appeal process. It has been claimed that some use intimidatory tactics, overly complicate matters, concentrate on legal matters and generally do not add a great deal to what are, in essence, planning issues. Lawyers generally operate in an adversarial system. That approach is not, it has been argued, one that is appropriate to the RMPS. The system is predicated on public involvement, which can only be effective when informed debate, conciliation and mediation are used to achieve the best outcome.'

I would say – if only! I would also make it clear that I have the utmost admiration and respect for the way in which the Tribunal conducts its mediation processes and preliminary hearings. In my view, the reason that the situation described by Edwards existed in 1997, and has only got substantially worse since, is because some lawyers behave in such an entirely inappropriate manner. If the workings of the Tribunal were in accordance with the wishes of the Parliament and the provisions of the Act, this serious criticism would not exist.

The second reading speech for the Act stated, in part, 'The Tribunal itself should operate in a way which is informal and designed to deal with the substantive issues rather than points of legal technicality. As a consequence, the Tribunal is empowered to set to one side minor procedural or inconsequential difficulties, so that it can deal with the merits of a particular application.' I would say again – if only!

I have been one of the greatest fans and supporters of the Resource Management and Planning System in Tasmania and I believe it still has the potential to be the best land-use planning system in the country. Unless we get the Tribunal back on track, however, there is little point in having a third-party appeal process that has been hijacked by lawyers who are only interested in strutting their knowledge of the law rather than wanting to get the best planning outcome.

Thank you to all the wonderful people I have had the pleasure to meet over the last twelve years and for the incredibly satisfying time I have had in doing my bit to protect our special island home.

Michael Lynch

Gambusia *Project Update*

The Natural Heritage Trust-funded Priority Action Project to 'Investigate Distribution and Control of *Gambusia holbrooki*' in the Natural Resource Management North Region has made great progress in addressing the gambusia issue in Tasmania. The aims of the project are to raise community awareness of the introduced pest fish *Gambusia holbrooki*, determine the extent of its distribution, investigate possible control measures and establish partnerships in the other NRM Regions to spread the message.

The community education campaign has not only been present at obvious public events such as Agfest and the Inland Fisheries Open Day at Liawenee but also at some of the local agricultural shows including Launceston, Exeter, Campbell Town and Scottsdale. Other events attended include a Coastcare Week Event and Wildcare Inc AGM and Conference at Low Head, the Tasmanian Landcare Association Conference at Lake Barrington and World Wetland Day events at both Meadow Mews Shopping Centre and the Tamar Island Wetlands Centre. We were also invited to participate in the Feral Animal Forum hosted by the Threatened Species Network in Hobart.

Presentations have also been made to school groups including Woodbridge District School, TAFE Tasmania NRM Students, Launceston College Biology and Environmental Studies students and Reece and Riverside High School students. Fishing clubs have also been targeted, as their members are in areas where gambusia has the potential to become established. These approaches have enabled us to communicate with an extremely broad cross-section of the community.

The production of the gambusia brochure has enabled information to be sent to other areas in the state through the local Waterwatch, Coastcare and Fishcare networks as well as fishing clubs. They have also been distributed through fishing tackle stores and pet shops, initially in the Tamar Valley, with businesses in other areas soon to be included.

We have also received excellent media coverage with numerous interviews on ABC Radio, WIN Television and City Park Radio along with articles in the *Mercury* and *Examiner* newspapers, Inland Fisheries Newsletter, Tasmanian Fishing and Boating News and Gambusia information on the Wildcare Inc website.

It is very encouraging that we are now talking to people at various venues who say, 'yes, we have heard about gambusia' which is a good indication that our approach to community education is working, and we have the opportunity to reinforce the message.

Over the last two summers monitoring has taken place in the Tamar Estuary to determine the extent of the distribution of gambusia in the area. Conclusions drawn

from the 2005 monitoring are that the only suitable areas of habitat that gambusia can access through natural distribution are located between Cormiston Creek at Riverside, north to Lady Nelson Creek at Dilston (10–12km in a straight line). The only way they can expand their distribution outside these areas is via humans. Eleven sites within that range have gambusia populations present, with two appearing to be temporary refuges, three on the East Tamar being a part of the same system and three on the West Tamar also closely linked. Two of the remaining sites have already been targeted for eradication with work on the final site planned for the near future.

These include a dam where the original population was released in 1992 and a farm dam linked to the Tamar Estuary by a drainage channel. The process involved in dealing with the farm dam commenced with the capping of the culvert that linked the dam to the estuary. The water in the dam was then pumped out onto an adjoining paddock through a filter, a process taking approximately 14 hours. The area was then treated with lime to eradicate any remaining gambusia. A native fish rescue program was in place to relocate any native fish found during the process.

The second site only had an overflow that linked to the estuary so the same pumping, native fish rescue and treatment process took place. An ongoing monitoring strategy is now in place to gauge the success of the process and to determine how quickly the water and macro invertebrate populations return to pre-treatment levels.

Of the remaining nine sites in the Tamar, one at the Tamar Island Wetlands has dried out naturally over the last three summers and the culvert linking it to the other lagoons has been netted to allow water movement but prevent gambusia from re-entering the lagoon. The levee banks of another two lagoons in the wetlands have been restored in an attempt to allow the area to dry out over summer to eradicate the gambusia. This has been unsuccessful to date due to a number of very high tides and other reasons yet to be determined. However, we will have another look at the site in the near future and try the process again next summer.

With the experience gained from the eradication program so far, we now need to reassess the remaining sites to determine how best to deal with them. We believe the temporary refuge sites only contain fish that have been flushed into the Tamar by natural water movement such as floods and tides, who don't breed in these locations. Once we have prevented new fish from entering the Tamar these sites will no longer be of concern.

Strategies are now being developed to implement eradication programs in the other breeding sites along with further monitoring of the Tamar Estuary next summer. However, these works are solely dependent on the project

Continued on page 9

Draft Recovery Plan for the Tasmanian Giant Freshwater Lobster

Submissions on the Draft Recovery Plan for the Tasmanian Giant Freshwater Lobster (GFL) closed on 27 June 2005. Below is a summary of the Threatened Species Network's (TSN) submission. We anticipate a final plan to be submitted to the Minister for the Environment, Judy Jackson, for approval in the next few months.

- The TSN has been on the recovery team for the GFL since its inception in February 1997 and has been part of drafting of four draft recovery plans for the GFC between 1997 and 2005. This time around we must ensure we complete the recovery plan so that we can commence implementing it. Not having a final plan has held up obtaining resources for managing this species – including mitigating threats from fishing and agriculture as well as forestry activities.
- Finalisation of the plan has been held up several times in the past because of disputes over the approach taken to management of forestry activities. The major dispute has been over protection of habitat that is likely to be important for GFL (mainly class 4 streams) but where records of GFL are largely absent.
- This version of the recovery plan has made a small but significant step forward in addressing the critical stream buffer issue. Under the new draft plan, GFL habitat will be classified as either *high suitability habitat* (below 250m altitude within the range of the GFL) or *moderate suitability habitat* (between 250m and 400m altitude within the range of the GFL). *High suitability habitat* will receive slightly stronger protection with 30m buffers for class 2, 3 and 4 streams (currently class 4 streams only receive 30m buffers where GFL have been recorded). *Moderate suitability habitat* will receive the same level of protection as is currently the case, i.e. 10m streamside reserves on class 4 streams, 30m for class 3 and class 2 and 40m for class 1.
- While the class 4 stream buffer recommendation is a positive move, the TSN is concerned that the cut-off for *high suitability habitat* may be set too low at 250m altitude. We understand that defining *high suitability habitat* is subject to ongoing research and that this research should be completed before the fauna provisions of the Forest Practices Code are amended.
- The TSN strongly supports the draft plan's recommendation that landscape management approaches such as protected areas 'need to be developed and implemented'. While the TSN wanted to see specific reserves proposed, a great deal of work has been done toward this end and this work should be finalised as a priority.
- The TSN also strongly supports the plan recommendation for further research focusing on the impacts of logging immediately upstream of *high suitability habitat*.

Peter McGlone

You could easily protect a threatened species

The TCT and Comalco Aluminium (Bell Bay) Limited have organised a series of three shorebird identification and monitoring field trips to be conducted by Birds Tasmania.

The details of the field trips are as follows:

1. Scamander Spit and Falmouth

The Scamander and Falmouth beaches are important breeding sites for hooded plovers, red-capped plovers and pied oystercatchers. Of additional interest is the regular sighting of little terns in the area. Little terns have not yet been confirmed as breeding in the area, although it is suspected. The highly dynamic nature of the beach at Scamander provides nesting habitat for hooded and red-capped plovers and pied oystercatchers.

Saturday 3 September 10.00am to 1.00pm

2. Orford Spit, mouth of the Prosser River

The Orford Spit at the mouth of the Prosser River is an important breeding site for fairy terns, hooded plovers, red-capped plovers and pied oystercatchers. The area was first fenced in December 1999 and again each season since then. This summer protective measures will again be required. We are seeking dedicated monitors to be involved in the identification and protection of shorebirds and this important habitat.

Saturday 10 September 10.00am to 1.00pm

3. Cloudy Bay, Bruny Island

Cloudy Bay is a beach that is highly impacted by people and vehicles. The spit west of Whalebone Point has nesting hooded and red-capped plovers and pied oystercatchers. The spit suffers less human disturbance and efforts will be made to increase protection and monitoring.

Saturday 17 September 10.00am to 1.00pm

Each field trip is free of charge. Please bring warm clothing, binoculars, field guide and lunch.

For more details and registration please contact our shorebirds project officer,
Esther Staal on 62343552 or
shorebird_tas@yahoo.com.au

Editor's note. Apologies for the late notice of these field trips. Due to a production problem we were unable to get this notice to press in time.

Groundsels & Fireweeds

With over 1500 species worldwide, the herbaceous groundsels and fireweeds make up a significant portion of the daisy (*Asteraceae*) family. This genus has many interesting features and relationships, including two intriguing stories. The first explores how the hardy South African sticky groundsel (*Senecio viscosus*) imposed grief and extensive heartache up on the 'Imperial Bushmen Contingent' troops during the Boer War and the second describes the strange but painful exploding trousers problem arising from efforts to control the rampant ragwort weed (*S. jacobaea*).

Groundsels exhibit attractive floral displays

Before exploring further the above two stories, let's highlight some of the fascinating attributes of the numerous groundsels and fireweeds species. Many species are horticultural gems appreciated for their contributions towards colourful garden displays. Well known are the reliable winter-flowering, shade-loving 'florist's cineraria', *S. cruenta* and the old fashioned grey-leaved Dusty Miller, *S. cineraria*. Others include the garden gem California geranium, *S. petasitis* with its distinctive lobed foliage enveloping delightful yellow panicles and the bold bright yellow flowering trusses of the big-leaf groundsel *S. grandiflorus*.

Alpine and woodland groundsels abound

Tasmania is privileged to have 23 indigenous species including a suite of alpine groundsels such as the single flowering yellow and cream forms of *S. pectinatus*, the floriferous *S. leptocarpus* and the showy *S. primulaefolius*.

Common woodland species include the shrubby and common fireweeds, *S. minimus* and *S. linearifolius* and the differing forms of the variable groundsel *S. lautus*. These grow prolifically with their characteristic yellow daisy flowers, often dominating any bare soil. The more drought-tolerant natives, such as the silver-coloured cotton fireweed, *S. quadridentatus*, hill fireweed, *S. hispidulus* and the annual fireweed, *S. glomeratus* (with its distinctive covering of soft cobweb-like hairs), carry out a scab-like protective role, particularly after bush fires and vegetation clearing. By temporarily protecting the soil from water erosion, they contribute significantly towards re-establishing the original woodland community and its delicately balanced interrelationships.

Butterfly-attracting flowers produce fluffy grey-bearded seed heads

Most species develop a characteristic fluffy grey or white parachute-like seed head (pappus). Since these resembled an old man's beard this feature resulted in the botanical name *Senecio*, derived from the Latin for old man, *senex*. Their common name, groundsel, came from *grundeswyle*, Latin for 'earth glutton'. This reflects upon the ability of its wind-blown seed to germinate freely, enabling them to act as pioneering colonisers.

Close examination of their yellow flowerheads, reveals many tiny ray- and disc-shaped florets, packed tightly together to resemble a single flower. This flower form evolved to provide a wonderfully simple way for nectar-seeking insects to easily pollinate many flowers during only one visit. Hence it is not uncommon to observe them enveloped in a cloud of insect pollinators such as beetles, hoverflies, moths, native bees, flies, flower spiders and ladybirds. The chaostola and donnysa skippers, along with the white grass dart and yellow-banded dart butterflies, take advantage of this feature, collecting nectar in exchange for their pollination services. Under protection of darkness their larva browses on native grasses or sedges and finally pupates by forming cylindrical cells out of the leaves that they tie and roll together. These butterflies are very territorial towards their groundsels, displaying aggression towards other males or insects, with buffeting and spiralling flight patterns. Their orange, brown and black colourations send a clear message to potential predators that they contain a highly toxic alkaloid (*pyrrolizidine*). In fact they have absorbed substantial amounts whilst feeding on the groundsel's pollens and flower parts. This same alkaloid has been linked to irreversible liver damage and death of stock. Flour (grain crops), milk (grazing cows) or honey (foraging bees) contaminated by groundsel are constant concerns to primary producers.

Sticky groundsel and ragwort had disastrous impacts

Unfortunately, the *Senecio* genus contains a number of environmental weeds including the highly toxic ragwort, *S. jacobaea* and the purple groundsel, *S. elegans*.

Ragwort, being a prolific weed confronting pastoralists both in Australia and New Zealand, was the focus of a major control program in the 1930s, using the unstable but effective potassium chlorate. However, the dust from this chemical trapped itself within the cotton fibres of horsemen's trousers. Once heated by riding friction it dramatically exploded, causing severe burns and major loss of dignity to many devastated horsemen. It was soon replaced by another, safer, herbicide by the late 1930s.

Sticky groundsel is the most toxic of all groundsel weeds and this fact brings us back to our Boer War story. The troopers' horses making up the ranks of the Light Horse Regiment were decimated by this toxic little South Africa native. This situation was described vividly in a quote by Adamson in the book *The Private Capital*. 'Horse sickness, a disease particular to South Africa, is doing its work: a horse starts out perfectly well and is dead by noon'. This had an enormous impact on the morale of the Aussie Light Horsemen, whose horses had accompanied them all the way from home. Their survival was a tribute to their trusty steeds.

As an aside, the sticky groundsel's succulent leaves have enabled it to flourish as a weed on gravel bedding along railway lines in the USA. Its fine roots clamber over the

stone surfaces, scavenging moisture that condenses in the cool of the night between the stones. With its ability to kill most grazing insects, its insecticidal qualities are attracting research dollars.

Parrot's favourite treat

On a happier note, the common groundsel (*S. vulgaris*) often revives memories of those bygone days when one's pet parrot, canary or finch was given a fresh sprig as a treat. Many of our feathered friends also enjoy, without ill effects, pecking the developing seed heads from our native

groundsels. These birds include the introduced European goldfinch, the greenfinch and the beautiful firetail (Tassie's only native finch), along with our colourful blue-winged parrot, eastern and green rosellas and musk lorikeets. For gardeners, feeding the birds is one of the many great reasons for growing a selection of hardy but cheery groundsels and fireweeds.

Phil Watson

Meander Dam *the truth emerges*

On 25 July, the Tasmanian Government approved a 'development agreement' with Tasmanian Water Solutions for the proposed Meander Dam. According to the Minister for Primary Industries and Water, this agreement would allow the developer to 'finalise contracts with farmers for water sales'. However, on the same day, the Greens spokesman for Primary Industries and Water released 17 pages of leaked cabinet documents that reveal the real story. The picture is damning.

The leaked documents take the form of a briefing note to cabinet, which is signed by Infrastructure Minister Bryan Green. Advice from Crown Law is appended. In summary, the documents reveal the following about this enormous white elephant.

- ◆ The State Government dumped the previous 'preferred proponent' led by Rothschild and the John Holland Group (RJH) after a request from this consortium to underwrite costs if the project fell over. The Tasmanian Government did not want to be exposed to this level of risk, but has subsequently been put in a similar situation with Tasmanian Water Solutions (TWS). The documents reveal that the Tasmanian Government is concerned that RJH will raise this issue.
- ◆ TWS did not achieve 'financial close' by the deadline of 11 July. No information is provided on how much money has been raised (the documents only refer to 'expressions of interest'), but the implication is that it is very low.
- ◆ The documents state that despite 'additional public funding' contributions of \$4.6 million from Hydro Tasmania and the Australian Government, the increased requirement for private sector funding has reduced the financial viability of the project to a 'marginal level'.
- ◆ TWS has proposed that it raise the shortfall in funding from a bank loan. The State Government

has given TWS until 30 September 2005 to show that it has contracts for 15,000 ML of water and bank finance for the balance of construction.

- ◆ TWS is the only remaining private sector body willing to proceed with the project.
- ◆ The Tasmanian Government has forwarded an additional \$750,000 to TWS with no conditions attached.
- ◆ The insurance adviser to the Tasmanian Government believes that the project requires a higher level of insurance than TWS has proposed.
- ◆ Crown Law considers the security of the agreement with TWS to be 'weak'.

As is so often the case, coverage of this important issue in the Tasmanian press has been woeful. For those interested in reading these documents in full, they are available from the TCT website at www.tct.org.au.

Craig Woodfield

Continued from page 6

receiving further funding as the current funding runs out in September. We have been in discussions with NRM North but no guarantees have been given.

Two other gambusia populations were identified in the south of the state in 2003 with the Inland Fisheries Service treating the sites in the summer of 2004. Monitoring of both sites this year found no evidence of gambusia. Monitoring will again be undertaken next season to confirm that the populations have been eradicated.

Rodney Milner
Gambusia Project Officer

Iris Farm

private nature reserve

The Iris Farm Private Nature Reserve near Cradle Mountain is owned and managed by TCT Life Members John Wilson and Peter Sims.

It was officially opened by the Hon. Bryan Green, the then Tasmanian Minister for the Environment and now Minister for Forests (Labor) and Senator Richard Colbeck (Liberal) in July 2003, as part of the joint government-sponsored Natural Heritage Trust Protected Areas on Private Land Program.

The new 288-hectare (a little over 700 acres) reserve consists of three adjoining blocks that were designated as Private Timber Reserves near Daisy Dell, and these were acquired in 2001 from the Launceston-based plantation company Forest Enterprises Pty Ltd which had plans to clear-fell and develop monoculture. Some roading and timber harvesting operations were already in progress on about 80 hectares in the north-east corner during the negotiations for the sale of the properties. However significant concessions saw important habitat trees, trash and seeding clumps retained, which are now providing a good basis for wildlife recovery and natural rehabilitation to occur.

The properties were originally owned by the manager of the Shepherd & Murphy (S&M) underground wolfram mine at Moina and his wife, William and Caroline Hitchcock. The Hichcocks' residence used to be situated near the big pines just off the dirt road to the Hydro's Gairdner impoundment. During their management of the S&M mine, water was sourced from the second of the Weaning Paddock Creek Falls via a nine-kilometre water race which ran through their properties to provide power for the ore's crushing plant.

The new reserve contains some of the best remains of this water race which was begun in 1903, finished in 1907, frequently sabotaged by platypus, and finally abandoned after a big fire swept up the Wilmot River Valley in 1918.

Situated in sub-alpine country with an elevation ranging from 580 metres in the beautiful Iris River Valley (Glanerlyweenne in the Tasmanian indigenous language) to 800 metres on the plateau, the new reserve is right next door to the old VDL property of Middlesex Plains, which was reputedly the site of the last open conflict between tribal Aborigines and white settlers in 1841.

Besides having its own Aboriginal heritage sites, it is environmentally significant in that it provides a wide range of habitats for some of Tasmania's rare or threatened birds, animals and plants. In particular, it supports good examples of *Leptospermum langgerum* forest and a smaller area of *Acacia melanoxylon* on rises, both of which require urgent reservation at a bio-regional level, as well as a fine example of riparian rainforest along a two-kilometre frontage of the Iris River.

On the northern side of the river, the new Stormont Informal Forest Reserve now provides a valuable linkage

for fauna and flora transmigration onto the enlarged Black Bluff Recreational Reserve. There is also another new informal forest reserve linked on the eastern side, incorporating the lovely Bridal Veil and Champagne Falls.

Notably, Iris Farm includes two small internal blocks (totalling 7 hectares) that were exempted from the covenant for residential or eco-tourism purposes. A traditional Tasmanian mountain shelter called Ike's Hut was constructed on one of these exempted areas during the International Year of Built Heritage 2004, using 4,000 hand-made shingles of King Billy pine salvaged from the west coast under government licence, as well as a range of other Tasmanian native timbers sourced from family-operated north-west coast mills.

Like most privately owned land in Tasmania, the Iris Farm Private Nature Reserve has been subjected to a range of environmentally adverse human activities over many years, such as roading, prospecting, logging, timber hooking, trapping, shooting, cattle grazing, rubbish dumping and off-road vehicles. Fortunately, most of these activities were confined to the high plateau behind the former Daisy Dell village, leaving the less penetrable Iris River frontage with its horizontal scrub, magnificent dense rainforests and tall *Eucalyptus delicatensis* slopes essentially intact.

Covenenting with the government has enabled John and Peter to set up an agreed management and rehabilitation programme, and begin to utilise the property in much more environmentally friendly ways.

Visitors have included academics from interstate and overseas universities, indigenous groups, the Central North Field Naturalists, the Launceston Field Naturalists and the Burnie Field Naturalists. Delegates to the Australian Fungimap conference held at Gowrie Park described the Iris Farm Private Nature Reserve as one of Australia's 'fungi hotspots'.

Peter Sims

(On 19 June 2005, the Sunday Examiner ran a cover story in its Sunday Magazine section on Iris Farm with a full-page colour photo section. Well worth the follow-up.)

TCT Membership Renewal

Subscriptions/membership renewals are due
on 1 July 2005 for the financial year
ending 30 June 2006.

If you are unsure of your financial membership status, please check the address label on the back of this newsletter: printed above your name, you will find the expiry date of your membership.

De Nile isn't just a river in Egypt

popular 1080 myths still doing the rounds

Readers of rural newspaper *Tasmanian Country* will have no doubt been following a lively debate on the use of 1080 poison in recent weeks. This was triggered by what we would consider ill-informed comments by Tasmanian Farmers and Graziers Association Meat Council Chairman David Byard. However, the airing of some of the biggest myths surrounding the use of 1080 has at least allowed them to be publicly debunked.

The first of these is that fencing native wildlife out of pasture and crops would somehow result in massive suffering as thousands of animals starve to death, combined with massive damage to native vegetation. This is of course absolute nonsense. Marsupials are very good at taking advantage of favourable conditions, and respond just as quickly to unfavourable ones. Should a plentiful food supply in a particular area disappear, a combination of aborted breeding and migration would very quickly result once again in a sustainable population. Let us also not forget that starvation is already a significant cause of mortality in native animals. The concept that native vegetation could not deal with this situation ignores the fact that Tasmania's flora and fauna have evolved together for many millions of years, and it usually takes something quite spectacular to seriously upset this balance.

Another favourite myth is that the government applies full cost recovery in its administration of 1080 use. Again, complete claptrap. Although the cost of much of the

administrative effort is recovered, the costs associated with on-ground assessment are not. In the case of 1080 permits, this work is usually done by a Parks and Wildlife Service Ranger. There is a double cost involved here, as the ranger conducting such field work is not able to carry out his or her primary duty of managing Tasmania's reserves. Taking travel time, assessment and reporting and lost time into account, such work could very well be costed in the thousands of dollars. We have calculated that only 10 to 30% of the actual cost of a 1080 baiting operation is recovered, making it a highly subsidised activity.

The final thing that has become apparent in the pages of *Tasmanian Country* is that the agricultural producers steadfastly refuse to consider the implications of the use of 1080 poison against native animals. In all the hype over the 'Fair Dinkum Food' campaign, there has not been one mention of improving the image of agriculture. It does not take Einstein to realise that images of piles of poisoned wallabies, possums, bettong, wombats and quolls are not really consistent with the marketing advantage that Tasmanian farmers are hoping will miraculously materialise out of thin air. On the other hand, one would think that 'wildlife-friendly farming' definitely deserves consideration. Unfortunately, given the comments that we have seen in *Tasmanian Country*, the comfortable old myths and excuses aren't going away in a hurry.

Craig Woodfield

Jumping the garden fence

In March, WWF Australia released a major new CSIRO report, 'Jumping the Garden Fence: Invasive garden plants in Australia and their environmental and agricultural impacts'.

This report, by Dr Richard Groves, Dr Robert Boden and Dr Mark Lonsdale, immediately came under attack from nursery industry representatives for recommending bans on various weedy garden plants.

The report documents the extent to which garden escapes dominate our weed lists.

The gardening industry is by far the largest importer of introduced plant species, being the source for the introduction of 23,360 or 94 % of new plant species into Australia.

Garden plant introductions are also the dominant source of new naturalised plants and weeds in Australia. Of the 2,779 introduced plant species now known to be established in the Australian environment, 1,831 or 66% are escaped garden plant species.

The report's recommendations include:

Recommendation 1

At least 80 species that are currently available for sale should be prohibited nationally from sale as an urgent priority. These include the species that are Weeds of National Significance, species on the Alert List, the 83 species that are declared or noxious, and the 10 species that impact on Rare or Threatened (ROTAB) species.

Recommendation 4

Amendment or new regulations to the current federal Environment Protection and Biodiversity Conservation Act should be considered, to allow national prohibition of the sale of specific invasive garden plants known to be major weeds and to ensure uniformity between all states and territories.

Recommendation 5

Voluntary associations between nursery groups and weed managers at the local and regional levels should be fostered to increase the number and effectiveness of future associations.

Recommendation 6

Bushland areas adjoining periurban settlements around Australian cities should be actively and regularly searched by experienced botanists and trained community volunteers to detect and eradicate newly naturalised plant species that have already 'jumped the garden fence'.

Feral Herald, March 2005

Grumpy

...lament waiting lists, wasted opportunities and wayward

Nicola Beynon¹, Michael Kennedy²

The title of the paper will not mean much to those that have not seen the BBC TV show, *Grumpy Old Men*. Those that have will know it features middle-aged British celebrities, ranting about their disappointments and exasperations with the world. They bemoan everything from mobile phone etiquette, incoherent street signage, computerised call centres and personal stereos to the currently fashionable low-slung jeans worn by young women. On the morning after watching an episode of the program, three weary environmentalists sat in the coffee shop of Canberra airport ahead of a day's lobbying in Parliament, and ranted about the ailing state of Australia's biodiversity, the state of conservation laws and policies, and the state of the conservation movement. We realised that we were grumpy old greenies – but with deadly serious and far from amusing or trivial concerns.

This paper concentrates on the Commonwealth legislative responses to a national biodiversity crisis, nearly six years after the passage of the EPBC (*Environment Protection and Biodiversity Conservation Act 1999*) and some four years after the current authors wrote about the development of that law,⁴ and conveyed optimistic thoughts on its future implementation and environmental effect. While the authors remain convinced that the EPBC is a legal instrument fully capable of meeting modern day environmental management needs, it is clear to us that the Commonwealth has failed miserably to live up to the EPBC's immense protective potential. We go on to suggest some actions that might be equal to meeting the conservation demands of Australia's increasingly beleaguered ecosystem services. Australia's biodiversity crisis is well documented in State of the Environment Reports (1996, 2001), the Australian Terrestrial Biodiversity Assessment (2002) (which reported that no less than 2891 ecosystems and other ecological communities are considered threatened) and most recently the Australian Bureau of Statistics Measures of Australian Progress: Summary Indicators (2005) (which reported that between 1994 and 2004 the number of terrestrial bird and mammal species assessed as extinct, endangered or vulnerable rose by 39%). Indeed, the latest State of the Environment Report noted, on the plus side, that many procedural indicators were positive (more money, more effort, more engagement) but that the performance indicators were negative (we're still going backwards – what we're doing is not working – or making it worse).

Humane Society International (HSI) and WWF also conducted their own joint review⁵ of the national implementation of the Australian National Strategy for the

Conservation of Biological Diversity in 1998 (the Strategy was launched in 1996) finding even early implementation woefully lacking. This was followed by a 2000 HSI report card⁶ on the same topic, in which governments were told:

'Far too little is being done. There is a failure to meet set objectives, with problems escalating in some regions. This is an area in which the Commonwealth must use its new and existing powers to show leadership'.

This was followed in 2004, by an extremely comprehensive investigation⁷ and analysis of the progress in implementing the revised National Objectives and Targets for Biological Diversity Conservation, 2001 – 2005, commissioned by the National Biodiversity Alliance (NBA)⁸. This report was published by HSI and WWF prior to the 2004 Federal Election. Of the 29 targets reviewed, only 10% were met within the timeframe; 28% were largely or unlikely to be met within the timeframe; 52% were not met within the timeframe, and 10% were undetermined. It is a crisis that is continental in scale, utterly predictable, widely known and generally understood, and yet the response by all governments has been pitifully inadequate at best, and grossly incompetent at worst.

The legislative power is now available to the Federal Environment Minister to deliver significantly advanced legal protection for Australia's biodiversity assets through the EPBC, and the authors give credit to the Coalition Government for bringing in this piece of legislation. But what use the power without the will to wield it?

In many key areas, there has been a serious failure to implement critical provisions of the Act that would substantively improve biodiversity protection and coherent environmental impact assessment. Where commendable protective measures have been taken, all too often they have been undermined or nullified by exemptions or wholly inadequate implementation procedures. And while the EPBC includes expanded standing provisions for third party enforcement, and these have been getting a decent work out by a few NGOs, conservation organisations can only do so much to compensate for the government's scarce political will to exercise its own considerable powers, and for the meagre resources given to the Department of Environment and Heritage (DEH) for implementation of the Act.

This paper is not meant to be a comprehensive review of EPBC implementation problems, but does address the provisions that impact mostly on biodiversity that are, in our view, doing the most damage and where we are being let down the most.

Old Greenies

pork-barrelling in Australia's biodiversity programs
& Alistair Graham³, Humane Society International

Emergency Waiting lists

The EPBC promised significant advances in biodiversity protection. Threatened species⁹ and endangered¹⁰ ecological communities became Matters of National Environmental Significance (MNES). As with the other MNES triggers, for the first time the Environment Minister has had the power to modify, or even veto, activities that could significantly impact upon them. These were great shifts in power to the Commonwealth and to its Environment Minister. But, of course only those species and ecological communities that are actually listed on the EPBC schedules have any hope of benefiting.

Ecological communities

Ecological communities, which should be the bastion of biodiversity protection, are missing out. Despite literally thousands of threatened ecological communities meeting the criteria for EPBC protection, only 31 are listed. A mere 10 have been added in the five years since EPBCA enactment, the others brought forward from the previous *Endangered Species Protection Act 1992*. Section 185 of the EPBC, a progressive amendment secured in the EPBC negotiations between the Democrats and the government, was meant to fix the listing process. Section 185 allows the Federal Environment Minister to assess all the ecological communities on state and territory lists for consideration for EPBC listing and also requires the Minister to keep the EPBC lists 'up to date'. The idea behind s185 was to bring the EPBC lists rapidly up to date and to reduce the reliance on ad hoc nominations from the public. After five years, s185 should have led to near comprehensive protection for all nationally endangered and vulnerable ecological communities across Australia.

Things did progress well in the first year of the EPBCA. In 2000, HSI referred to the then Minister, Senator Robert Hill, all the state and territory lists of threatened ecological communities; specifically, lists of threatened ecological communities under the *NSW Threatened Species Conservation Act 1995*, the *ACT Nature Conservation Act 1980*, the WA threatened ecological communities database, and forest communities identified in the Tasmanian and other Regional Forests Agreements (RFAs). These lists were subsequently gazetted, and the Minister instructed the Threatened Species Scientific Committee (TSSC) to assess the 500+ ecological communities on these lists for EPBC protection. At HSI's urging, the Minister also referred to the Committee the Queensland list of regional ecosystems and the ecological communities listed under the *Victorian Flora and Fauna Guarantee Act 1988*.

Therefore, by the end of 2000, the TSSC had literally millions of hectares of threatened wildlife habitats awaiting its critical assessment. In realisation of such a heavy workload, the TSSC set about developing a 'Strategic Framework' which was supposed to help them systematically go through all the ecological communities, to identify those that were nationally threatened and qualified for EPBC listing. Then in April 2001 Senator Hill listed brigalow woodlands, blue grasslands, semi evergreen vine thickets and mound springs. These were four highly biodiverse ecological communities, primarily found in Queensland, representing over one million hectares of threatened habitats, and submitted by HSI under the old Endangered Species Protection Act in 1999, concerned they were rapidly falling under the bulldozer in Queensland¹¹.

Farming lobby groups, particularly Agforce, had an apoplectic fit – you could hear the pitch forks being sharpened all the way from the paddocks of Charleville to the coffee shops in Canberra. There was a subsequent call for Senator Hill's resignation. Rumour has it that the Environment Minister then received an instruction to ease up on EPBC listings without the assent of his colleagues – a remote prospect at the best of times. Sure enough, no more ecological communities were listed during the rest of Senator Hill's term and only two were listed by the next Environment Minister, Dr Kemp. In addition to the massive number of threatened ecological communities already waiting adjudication, HSI also squeezed a 2001 Federal Election commitment from Liberal Party Campaign Director, Lynton Crosby, agreeing to refer all the threatened ecological communities identified by the Commonwealth's yet to be published Terrestrial Biodiversity Assessment Audit, to the TSSC for potential listing under the EPBC. The Audit subsequently identified nearly 3000 nationally threatened communities. Whether the Minister continued to receive advice on threatened ecological community listings from the TSSC during this time or whether the Department simply ran dead on the process is open to conjecture. We suspect it was a combination of the two, but there is also good reason, in our view, to assume the National Farmers Federation (NFF) attempted to use its political clout to influence the EPBC listing process. Section 185 does not include statutory deadlines for the TSSC to assess threatened ecological communities, so the TSSC was able to take things slowly – very, very slowly. However, the TSSC was still receiving public nominations under s191, which do have a 12-month statutory deadline for TSSC assessment and 90-day deadlines for the

Minister's decision on receipt of their advice. To get around this, the Minister started rejecting public nominations claiming that the TSSC would address them through the Strategic Framework.

The Minister used this excuse to reject twelve perfectly valid ecological community nominations from HSI, including the coolabah black box woodlands¹² rapidly being cleared in NSW. HSI knew the Strategic Framework was going nowhere, and so the EDO wrote to the Minister on our behalf, pointing out that having a Strategic Framework was not a valid reason to reject a public nomination¹³. The Minister partially conceded this point and agreed to reconsider the nominations, but we were subsequently advised by DEH that because they were nominations under 'reconsideration' they were no longer considered public nominations under s191 and, therefore, the TSSC and Minister would not be bound by the statutory deadlines. So, all but one of these critical nominations¹⁴ are still waiting decisions that were originally due in 2002 – a triumph for Sir Humphrey. We consider the five-year hiatus in ecological community assessment a travesty of good governance and a crushing disappointment, especially when considering the deepening biodiversity crisis facing this island continent. Many of the ecological communities in the TSSC's in-tray will have been suffering severe rates of clearing over the five years (think particularly of the panic clearing in NSW and QLD – and more recently in Tasmania – ahead of new vegetation clearing controls) and several were already critically endangered when HSI nominated them back in 1999 and 2000.

Since Senator Ian Campbell has been Minister there are signs the blockage may be easing. He has listed three ecological communities and several have been distributed for public comment. There are, nonetheless, literally thousands of threatened ecological communities covering many millions of hectares still stuck in the pipeline. The Minister can take comfort from the Productivity Commission report into the Impacts of Native Vegetation & Biodiversity Regulations which largely exonerated the EPBC Act when it comes to the impact on farmers' businesses – although it was critical of policy vagueness '... more fundamental change is required to promote better targeting of policies to achieve clearly-specified environmental outcomes as efficiently as possible' – quite so!¹⁵

In a rare moment of unison, HSI and NFF have both recommended the government set up stewardship funds¹⁶ to assist private landholders to meet their EPBCA obligations and actively protect ecological communities identified on their properties – a bit of carrot with the stick. Unfortunately, the NFF feels that it cannot work with HSI in promoting the concept. So we are offering our strongest possible encouragement to Minister Campbell to make up on seriously lost ground. But if the encouraging signs of late do not eventuate into listings, HSI has taken legal

advice from EDO on our options to pursue the matter through the courts.

Critical Habitats

There has also been a dearth of critical habitat listings under the EPBC Register of Critical Habitat. Despite a 2001 election commitment from the Coalition to list on the Register all the critical habitats of all endangered and critically endangered species, only eight critical habitats have been listed for five species. Only four habitats for two species have been listed in mainland Australia, while the rest are on Australia's subantarctic islands, whereas hundreds of critical habitats have been identified in the Recovery Plans that the TSSC has approved and the Minister has gazetted. How hard can it be to transfer what has been identified in Recovery Plans across to the Register? Yet, ignoring the will of the Parliament in creating the Register and the election commitment, DEH has argued gazetting critical habitats on the Register is not a priority. They simply refuse to do it.

We are told listing critical habitats is simply not a priority for high profile and publicly adored endangered species such as marine turtles, the humpback whale, the blue whale and even the grey nurse shark which, perilously close to extinction, has not had its 19 tiny and clearly demarcated

Grumpy Old Greenies

critical habitats listed on the Register. (DEH argues that declaring a Marine Reserve at the Cod Grounds critical habitat site is the utmost top priority for the grey nurse shark – agreed, but even that has been promised for two years and still not been delivered).

HSI has provided the Commonwealth with the data to allow it to list critical habitats for well over 60 species in the Register, but all our applications have been ignored.

Heritage

The heritage sections of the EPBC were added in 2003. Again they offered significantly advanced protection for places that would be listed on the Commonwealth and National Heritage Lists, and became MNES triggers. You would think that with the EPBC's most powerful protective measures on offer (in effect conferring defacto World Heritage protection) the major conservation and heritage organisations would be queuing up to see their pet places listed and nominations would be coming thick and fast. Aside from a handful of emergency nominations, and a growing list of nominations from small cultural/heritage groups around the country, public nominations have been virtually non-existent.

In this case, the major conservation and heritage organisations need to be mindful of their own performance when they protest the slow rate of listings. The legislative process gives clear priority to the assessment of public nominations, and without such a rigorous public process

in action, the National (and Commonwealth) Heritage Lists can hardly be expected to grow at the rate that is obviously required. Internal assessments have been triggered by the AHC (Australian Heritage Council) and at the launch of the first listings under the National Heritage List in Ballarat in the winter of 2004, AHC Chair Tom Harley announced that 14 'Natural Heritage Hotspots' were to be reviewed for their suitability for listing. Internal reviews however do not have any legislative deadlines, unlike public nominations which have to be assessed within 12 months. Increased public nominations for national heritage places are absolutely crucial.

Where the provisions for emergency heritage listings have been tested, it has to be said the results have not been encouraging.¹⁷ The thresholds for what constitutes 'national heritage' are being set at very lofty heights. There is the potential, however, that taking an extremely conservative view of what should end up on the National Heritage List will be at odds with the political parties and independent Senators that fought hard to steer suitable EPBC heritage amendments through the Senate. This will simply bring disrepute. How these processes and standards are finally determined will have significant long-term conservation implications for biodiversity in this country.

For our part, HSI has been fairly active on the heritage nomination front. We have submitted an emergency application to have the critical habitats of the critically endangered grey nurse shark listed, along with all 70 Tasmanian Seamounts. We are about to submit nominations for the whole of Australia's Antarctic Territory (AAT), which would include the entire EEZ, and for the critical habitats of Australia's remaining and viable dingo populations. Several other potential nominations are being reviewed, including for the Cumberland Plains woodland and the Brigalow Belt in Queensland.

In addition, and working with our colleagues at the Tasmanian Conservation Trust (TCT), we have helped trigger public nominations for the Tarkine and the Great Western Tiers, and are attempting to trigger nominations for Barrow Island and the Walpole Wilderness in Western Australia. HSI is also concerned to see the heritage rivers concept, first proposed by Peter Cullen, see the light of day under this new regime.

Key Threatening Processes (KTP)

We were duded in the EPBC negotiations over the Key Threatening Process (KTP) provisions. It is no longer a mandatory requirement to develop a Threat Abatement Plan (TAP) once a KTP is listed. In the days when TAPs were mandatory, a 1995 HIS nomination was able to bring about Australia's first TAP, the Threat Abatement Plan for the Incidental Catch of Seabirds During Oceanic Longline Fishing Operations (1998). This TAP has been more than shelf decoration, and was implemented through some serious regulations. Without the TAP driving things, it is doubtful tuna longline fisheries would have made any effort to mitigate their devastating impact on endangered albatross and petrels. But even with this TAP, ten years after submitting the nomination the problem is far from mitigated and industry has resisted many of the measures

in the plan. HSI is hopeful a review of TAP that is currently under way will lead to much more effective mitigation measures being prescribed. Now, however, the Minister does not have to develop a TAP if he or she believes that it is not 'feasible, effective or efficient way to abate the process'¹⁸. So it is that TAPs have not even been developed for climate change¹⁹ and land clearing²⁰, even though they are two of the gravest threats to Australia's biodiversity and endangering more species and habitats than any others. Without the weight of a TAP it seems unlikely that the substitute National Biodiversity and Climate Action Plan or the National Framework for the Management and Monitoring of Australia's Native Vegetation will lead to regulations and drive any significant change on the ground. However, National Threat Abatement Plans supported by new MNES triggers for land clearing and climate change²¹, and large sums of appropriately directed Commonwealth funds, might help reverse the situation.

Species affected by other key threats are missing out altogether. Their threats haven't even been listed, never mind abated. The Environment Minister still has not decided whether Loss of Hollow Bearing Trees During Firewood Collection²² should be listed as a KTP, even though HSI submitted the nomination eight years ago! Not even Sir Humphrey could come up with an excuse for that one. HSI was also stunned earlier this year when the Minister, accepting TSSC advice, rejected our nomination to list Shark Control Nets²³ as a Key Threatening Process. The nets, already listed a key threat by the government responsible for the program under NSW *Fisheries Management Act 1994*, kill grey nurse sharks. As per the criteria for listing a KTP, HSI contended that the nets would cause the grey nurse shark to be listed in a higher EPBC category – that is, it would move from critically endangered to extinct. NSW Fisheries scientists have predicted the grey nurse could reach quasi-extinction (less than 50 breeding females) in as little as six years²⁴ and two breeding females were killed in the nets on the very first day of the NSW shark net season last summer.

With this evidence before them, the TSSC still advised the Minister that it is not a 'key' threat because the nets are not the only or greatest threat to the grey nurse shark (more are killed by commercial and recreational fishing). HSI considers this to be a galling case of hair splitting when dealing with a species so very close to extinction. We utterly reject the Committee's interpretation that a key threatening process can only be the threat that is causing the highest mortality rate above all others.

Fisheries

Thanks to the EPBC, for the first time Commonwealth and export fisheries are receiving environmental impact assessment and, notwithstanding a few notable exceptions, this is beginning to yield some solid improvements in their management – if not the revolutionary shift to ecologically sustainable management that we had hoped for. The exceptions are perhaps more notorious than notable. The notion now being floated by officials and fishers, that fisheries accredited under this process be certified as well-managed and environmentally friendly with a label in the

market place, is both hilarious and horrifying. HSI will be warning consumers not to be duped.

For example, defying logic, the Southern and Eastern Scalefish Shark Fishery (SESSF) a well-known basket case in marine conservation circles was gazetted as an ecologically sustainable Wildlife Trade Operation in January 2004. To do this the Minister should have been satisfied that 'the fishery to which the plan or regime relates does not, or is not likely to, adversely affect the survival or recovery in nature of the species'. At the time, no less than six species, for whom the fishery is unquestionably the key threat, had been nominated for listing as threatened species (orange roughy, eastern gemfish, school shark, Harrison's dogfish, endeavour dogfish and southern dogfish). Indeed, HSI had even nominated the fishery itself for listing as a key threatening process.

HSI could not understand how DEH and the Minister could possibly find management of the SESSF to be ecologically sustainable, when the Australian Fisheries Management Authority (AFMA) was continuing its long-held tradition of timidly setting quotas that do nothing to constrain drastically falling catches – and presiding over the bycatch of several hundred fur seals every year. Neither had AFMA done anything to see that the fishery avoided catching critically endangered dogfish – if anything they were further endangering the species by allowing an expansion of auto-longlining, enabling the fishery to exploit previously inaccessible canyons, the species' only remaining refuge.

HSI wishes we had had more resources to mount a challenge to the SESSF accreditation. Fortunately the opportunity to bring a radical shift in the management of this fishery will present itself again to conservation groups in December 2006 when the WTO expires, if it is, once again, not an opportunity taken up by the Minister himself. HSI is currently mounting a challenge to the Minister's declaration that the Southern Bluefin Tuna (SBT) Fishery is an ecologically sustainable Wildlife Trade Operation, and things look set to get very heated in the Commonwealth Administrative Appeals Tribunal. Here the Minister does not argue that the stocks are badly overfished. There is no getting around the fact that Australia's SBT scientists say the parental biomass has been reduced to 5% of the level it was in the 1960s and has less than a 10% chance of recovering. Instead, the Minister claims his hands were tied because Australia has no choice but to allow its industry to fish the entire grossly unsustainable quota that is handed down by the international Commission for the Conservation of Southern Bluefin Tuna (CCSBT) and that has remained unchanged since 1989! This is an argument for which HSI can find no legal basis. We should also note that a motion from the Australian Democrats to disallow the accreditation of the Fishery is not likely to be supported by the ALP, just in case they think our grumpiness does not also extend to them.

Protection Poorly Implemented and Undermined

We have discussed the lack of various listings at length—because it is a crucial aspect of the legislation. If nationally important biodiversity components are not on an EPBC

list, the Commonwealth can do little to protect them. But the way the EPBC is being implemented, even those biodiversity treasurers that are listed remain at risk. Ecological communities such as Cumberland Plain woodland in the Sydney basin, the first ever ecological community protected by the Commonwealth²⁵, is still facing potential extinction by 'death of a thousand cuts'. Blame for this could be laid on the general inability of environment impact legislation to deal effectively with cumulative impacts of many small actions, but there is more that could be done to grapple with the cumulative impact problem through the EPBC. For example, Cumberland Plain woodlands deserve a set of Administrative Guidelines of the type that DEH might normally issue, to explain what will be considered significant impact upon such an MNES trigger. For Cumberland Plain woodlands, such guidelines should state that clearing of any of the paltry 5% of habitat type remaining would be considered 'significant' and no clearing applications would be approved. Cumberland Plain woodlands certainly deserve a grossly overdue Recovery Plan, but it seems that neither Commonwealth nor NSW governments have seen fit to fulfil their statutory obligations in this regard.

The experience of Cumberland Plain woodland highlights the general problems with the EIS processes. There is in fact a crisis in regard to the implementation of environmental impact assessment procedures under the EPBC. Another prime example of a commendable protective measure undermined, comes in the shape of the grey-headed flying fox. HSI mounted an exhaustive campaign to see this much maligned and controversial species given its due protection under the EPBC and a successful listing was achieved in 2001. Our win was short-lived for soon after DEH published Administrative Guidelines to explain how the listing would take effect. These guidelines stated that 1.5% of the population could still be shot without requiring a referral, and would not be considered a significant impact. Effectively sanctioning continuation of a key threat to the species, the Guidelines also completely ignored the well-known reality that permits given to trigger-happy fruit farmers were not being enforced by state authorities, so that numbers of flying foxes permitted to be killed were routinely exceeded.

HSI appealed the guidelines in the Federal court, gaining a win, with the help of the EDO and Barrister Chris McGrath. That win will hopefully ensure that no current or future Minister will attempt to pre-empt, in the public arena, what is a significant impact. Although HSI won this case, the Federal Court Judge still required us to pay our own costs, which amount to approximately \$40,000. The Department had to redraft the Guidelines to advise farmers that they needed to make their own decision as to whether their actions are having a significant impact and the need to make a referral.

Then there are the Administrative Guidelines that are ignored even by the department that published them. DEH published Administrative Guidelines for the endangered south-eastern mainland population of tiger quolls in 2004, which stated that 1080 aerial baiting programs in the

vicinity of tiger quoll habitat will be considered likely to cause significant impact and be treated as a controlled action. Since they were issued, there have been at least three referrals for aerial baiting that would affect tiger quoll habitats, yet the Minister has not declared them controlled actions. We are sure that there are many other occasions when referrals simply don't happen

For example, DEH recently concluded that a proposed 1080 baiting program for the Singleton Training Area and the Bulga Coal Mine in NSW will not be deemed a 'controlled action' even though the program involves aerial 1080 baiting, dropping 21 baits per km. So much for the Guidelines. HSI is currently developing a KTP nomination for 1080, and will consider what legal actions might be possible to oppose such programs in the future. HSI also understands that DEH is currently developing Administrative Guidelines for land clearing, but holds out no serious hope that they might be applied in a manner that will conserve biodiversity under threat. One particularly glaring example of the EPBC not being properly enforced is the failure to enforce the Australian Whale Sanctuary in Antarctica against Japanese whaling. HSI is currently in the Federal Court to try to injunct the Japanese whaling company concerned.

National Biodiversity Priorities Starved of Funds

If DEH were not so grossly under-funded, perhaps the waiting lists would not be so long, the thresholds for protection would not be set unassailably high, recovery plans would be developed and the critical habitats of critically endangered species would not be subject to such extreme levels of triage. DEH have barely enough resources to keep the impact assessment provisions of EPBCA going – Part 3: the front end of the EPBC Act. They have paltry funds with which to chase compliance and no education program to let landholders know of their conservation responsibilities and legislative liabilities. It is little wonder then that the discretionary 'back end' of the EPBCA – the biodiversity provisions in Part 12, 13 and 14 – are being completely neglected. No wildlife conservation plans have been published, no bioregional plans have been developed, no covenants for critical habitat exist, only one conservation agreement has been concluded, and recovery plans are still missing for species and ecological communities listed seven years ago. The government will say that it is spending up big on the environment and it's true that billion-dollar slush funds are available for regional 'bottom up' environmental protection through NHT and NRM. But crucially, DEH itself is starved of its own funds: threatened and migratory species and wetlands are all operating on a shoe string. They have no capacity and resources to influence other parts of DEH, let alone to go to a local government and suggest a bioregional plan or to a landholder and suggest a conservation agreement. Recovery planning, for instance, is sadly neglected and it is now alarming to hear that the government is considering

abandoning this approach – without having an effective replacement.

The Act was supposed to be the big stick held in reserve while the government negotiated recovery plans and other agreements with state governments and landholders lubricated by technical and financial support. This should have been – and should be – the cornerstone of NRM and NHT funding. Frustratingly the sections of DEH that are engaged in NHT/NRM programs, and wrestling with DAFF and local interests over expenditure, seem quite unwilling or unable to insist on biodiversity outcomes being inserted into these 'bottom up' regional plans – let alone into the attached investment plans. Just like Landcare and NHT1 before it, NHT2 is turning into the largest rolling pork barrel this country has ever seen – careering across the Australian landscape devoid of strategic direction and

Grumpy Old Greenies

control, spending a large proportion of the national environmental budget to limited discernable effect.

Don't Get Grumpy, Get Even

To try and turn things around, HSI knows we need to be more than just grumpy. HSI has taken several matters to the Federal Court²⁶ and the Commonwealth Administrative Appeals Tribunal²⁷, and is likely to increase legal actions of this type in the future. We have also been engaged in the New South Wales Administrative Appeals Tribunal and the Victorian Supreme court for the protection of the grey-headed flying foxes. HSI has also given the Coalition Government several solid and constructive proposals to tackle Australia's biodiversity head-on and effectively.

'Future Proofing Australia'

With an eye on the proceeds from any third Telstra sale, HSI gave the Coalition Government, in early 2004, a major proposal to 'Future Proof Australia'²⁸, although HSI and the NFF appear to have been gazumped by the Treasurer in allocating funds from the sale of Telstra to a new Future Fund to meet past governments' failure to provide for government public servants' pension payments (though new talk of a rural fund to pacify the Nationals may provide some leeway for stewardship funding). Wherever the funds are sourced from, we have recommended a multi-billion-dollar investment over the next 15 years to secure Australia's biodiversity assets through a National Conservation Action Program, a National Conservation Farm Program and a National Environmental Information and Auditing Commission. The National Biodiversity Alliance has similarly called for a New National Biodiversity Initiative²⁹.

HSI envisages a new national biodiversity program with the financial and political stature of the National Action

Plan for Salinity and the National Water Initiative. It is clear that existing NRM programs do not necessarily nor primarily serve biodiversity conservation priorities. Australia needs a major new program specifically dedicated to conserving national and international biodiversity priorities. Our Future Proofing proposal includes a suite of biodiversity conservation initiatives and programs that would give purpose and direction to future mass expenditure in the environment. The programs would be underpinned by a generously resourced DEH, to fully implement the EPBC. The proposal includes a stewardship fund, as there seems to be an emerging consensus that this is the way to go in engaging landholders in Australia. In our proposal, such a delivery mechanism is driven by focused and effective policy, programs and initiatives as advocated by the Productivity Commission, and would not become yet another aimless pork-barrelling exercise like Landcare and NHT before it.

To help avoid this, HSI proposes the new national biodiversity program be steered by committee of expert professionals from the biodiversity conservation field and be subject to an independent auditing body. We have also recommended DEH be given resources to set up regional offices around the country so landholders and the swarms of NHT facilitators can find out what should be done to conserve biodiversity in their property and community and meet their EPBC obligations to protect Matters of National Environmental Importance. This is an absolutely essential next step for implementation. Frustratingly, we have learnt the hard way that these swarms of NHT-funded state officials and NRM facilitators are simply not doing the job. Someone has to get out there and actually tell landholders what their responsibilities and liabilities are – with a mandate to offer genuine assistance to the willing and genuine persuasion to the recalcitrant.

EPBC Watch Dog

We also think that the conservation movement needs to get serious about making the EPBC work. The national conservation movement has failed to engage fully and effectively in EPBC implementation, and is largely uneducated about the significant potential powers and very broad national reach of the Act, despite the excellent and very strenuous efforts of the EPBC Unit³⁰ in Canberra. The authors believe this is a lingering hangover from the vocal opposition to the Act from the Greens, Australian Conservation Foundation and The Wilderness Society when it passed Parliament in 1999. The EPBC Unit in Canberra is principally for information dissemination and education about the role of the EPBC. There is an additional and separate need for an EPBC ‘watchdog’, and it is a role that should be fulfilled by a major national conservation organisation. It should be an NGO program that systematically follows all the EPBC processes, and jumps on the failings and transgressions. A dedicated NGO program needs to track EIS processes, monitor what happens to species and communities, and raise merry hell about legal failures and environmental injustices, helping to coordinate legal actions that may result.

Conclusion

If the political will were mustered, the Australian Government has the power, the money and the means to attack this continent’s biodiversity crisis with serious conviction. Instead world class legal provisions lie dormant, dollars are misspent and all the while the crisis deepens. DEH needs to become far less conservative in its general approach and far more proactive and forceful in implementing the EPBC, and develop an attitude to NGO involvement in policy development and execution that does not make us think that DEH is a part of the problem. The Minister’s office needs to take charge. With the effective removal of administrative grants to NGOs around Australia, the recent Federal budget all but ignoring biodiversity, and the loss of the balance of power by the minor parties in the Australian Senate from July this year, ‘grumpy’ is a word that doesn’t really do justice to the extent of our perennial frustration.

References and footnotes

- 1 Nicola Beyton. Wildlife & Habitat Protection Program Manager, Humane Society International.
- 2 Michael Kennedy. Campaign Director, Humane Society International.
- 3 Alistair Graham. Consultant, Humane Society International; Campaigner, Tasmanian Conservation Trust.
- 4 M Kennedy, N Beynon, A Graham and J Pittock, (2001) ‘The Development and Implementation of Conservation Law in Australia’, *RECIEL (Review of European Community and International Environmental Law)*, Volume 10, Issue 3.
- 5 Humane Society International and World Wide Fund for Nature Australia, (1998). ‘From Words to Action: A Preliminary Review of Progress to Implementation the National Strategy for the Conservation of Australia’s Biological Diversity’. Discussion Paper.
- 6 Report Card: Implementation of Australia’s National Strategy for the Conservation of Biological Diversity (2000), prepared by Community Solutions for Humane Society International.
- 7 Small Steps for Nature; A Review of Progress Towards the National Objectives and Targets for Biological Diversity Conservation 2001-2005, (2004), prepared by Griffin NRM Pty Ltd for the National Biodiversity Alliance (NBA).
- 8 The National Biodiversity Alliance(NBA) comprises the Australian Bush Heritage Fund, Australian Wildlife Conservancy, Birds Australia, Greening Australia, Humane Society International and the World Wide Fund for Nature.
- 9 Threatened includes the categories critically endangered, endangered and vulnerable.
- 10 Regrettably vulnerable ecological communities are not MNES triggers, something hopefully to be addressed in the current five- year review of the MNES.

- 11 Degraded due to grazing pressure in the case of the mound springs.
- 12 Coolabah black box woodlands have been listed by the NSW Government on the NSW Threatened Species Conservation Act after an HSI nomination. Farming lobby groups have vigorously opposed this listing, even though they are knee-deep in negotiations to end land clearing in that state. HSI has recently received a Freedom of Information request relating to this nomination and documents. We believe a farming lobby group is preparing a nomination to have it de-listed.
- 13 A public nomination can only be rejected based on the conservation status of the species or community being nominated.
- 14 Temperate Highland Peat Swamps on Sandstone listed May 2005. The Minister has also since listed one more HIS nomination, Weeping Myall Woodlands in the Hunter Valley in July 2005.
- 15 Productivity Commission, April, 2004.
- 16 NFF has proposed a \$250 million National Environment Management Program. It was not successful in the 2005 Federal Government budget outcomes.
- 17 Noting that nominations for emergency heritage listings are assessed by DEH and the Minister does not receive the benefit of the Australian Heritage Council's advice.
- 18 EPBC s270A.
- 19 Loss of climatic habitat caused by anthropogenic emissions of greenhouse gases listed as a KTP under the EPBC in April 2001, following a HSI nomination.
- 20 Land clearing listed as a KTP under the EPBC in April 2001, following a nomination by Mike Krockenberger, Professor Jamie Kirkpatrick and Michael Kennedy.
- 21 In a submission to Senator Campbell in 2005, the Australian Council of National Trusts, the Tasmanian Conservation Trust, WWF and HSI proposed the addition of four new MNES triggers on broad scale land clearing, greenhouse gas emissions, unsustainable water use and large dam construction. The combined groups have also urged amendments to broaden existing triggers on ecological communities (to include vulnerable), the Commonwealth marine environment, nuclear actions and migratory species.
- 22 While the KTP has not yet been adjudicated, we are led to believe it did assist the government in bringing states and territories together to discuss national solutions to the problem.
- 23 Death or injury to marine species following capture in lethal shark control programs on ocean beaches was nominated as a KTP under the EPBC, by HSI in September 2002. The Minister rejected it in March 2005.
- 24 Otway, N M, Bradshaw, C J A., & Harcourt, R G, (2004) Estimating the rate of quasi-extinction of the Australian grey nurse shark (*Carcharias taurus*) population using deterministic age and state classified models. *Biological Conservation*.
- 25 Cumberland Plain woodland listed as endangered in 1997 on the *NSW Threatened Species Conservation Act 1995* and in 1998 on the *Commonwealth Endangered Species Protection Act 1992* both as a result of a joint nomination from Humane Society International and the Australian Conservation Foundation.
- 26 HSI vs. Kyodo Senpaku Kaisha Ltd (Japanese Whalers) 2004; HSI vs. Minister for Environment and Heritage (2003) (rey-headed flying-fox).
- 27 HSI vs. Minister for Environment (2005) (southern bluefin tuna); Tasmanian Conservation Trust and HSI vs. Minister for Environment and Heritage (brush-tail possums in Tasmania and Bennett's wallabies and Tasmanian pademelons on Flinders Island, 2000).
- 28 Future Proofing Australia, A proposal incorporating the establishment of a National Conservation Action Program, a National Conservation Farm Program, and a National Environmental Information and Auditing Commission, 2004, prepared by Humane Society International and the Tasmanian Conservation Trust (S. Brown., M. Kennedy, A. Graham, and N. Beynon).
- 29 National Biodiversity Alliance (NBA) 2004. Proposal for a New National Biodiversity Initiative Securing Australia's Nationally Important Biodiversity and Ecosystem Services.

TCT Annual Report

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