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Yass Council

Re. Cemeteries Management Plan and Masterplan

Friends of Grasslands (**FOG**) and the Conservation Council ACT Region (**CCA**CT) (together, 'we') appreciate the opportunity to comment on Yass Council's Cemeteries Management Plan and Masterplan.

FOG is a community group dedicated to the conservation of grassy ecosystems in south-eastern Australia - natural temperate grasslands and grassy woodlands. FOG advocates, educates and advises on matters to do with the conservation of these ecosystems, and carries out surveys and on-ground work. FOG is based in Canberra and its members include professional scientists, landowners, land managers and interested members of the public.

The CCACT is the peak non-government environment organisation for the Canberra region. Since 1981, we have spoken up for a healthy environment and a sustainable future. We campaign for a safe climate, to protect biodiversity in urban and natural areas, to protect and enhance waterways, reduce waste, and promote sustainable transport and planning for our region.

Yass Valley Council is the custodian of a number of cemeteries that contain extremely high conservation values. The cemeteries that we have a special interest in are Bookham, Bowning, Gundaroo and Murrumbateman Bush. We have a particular interest in these for several reasons:

1. The cemeteries are known to have extremely high-value examples of critically endangered ecological communities, with all but one of the cemeteries occupied by the Commonwealth-listed White Box Yellow Box Blakely's Red Gum Grassy Woodland and Derived Native Grassland, and with Gundaroo Cemetery occupied by Natural Temperate Grassland of the South Eastern Highlands.
2. These ecological communities host a number of threatened species, including Superb Parrot (*Polyteles swainsonii*), Golden Sun Moth (*Synemon plana*), Yass Daisy (*Ammobium craspedioides*) and declining species including orchids and the culturally significant Murrnong or Yam Daisy (*Microseris walteri*).
3. FOG has visited these cemeteries on our regular series of field outings and, with this experience, is of the opinion that they have a potential to considerably add to the tourism potential of Yass Valley Council.

Ecologists in FOG have extensive survey experience with the cemeteries, along with other important remnants of the endangered ecological communities in the broader region. Data from these surveys are available in NSW BioNet and the Atlas of Living Australia.

We are concerned that the Draft Plan does not contain clear, cemetery-specific objectives or detailed management prescriptions to protect and manage the legislatively protected areas of high conservation value inside the cemeteries' boundaries.

An interim management plan for Murrumbateman Bush Cemetery has been drafted (NSW Dept of Environment and Conservation, August 2006). This could act as a model for the kinds of considerations that should be adopted for the other high-quality cemeteries.

It is recommended that a qualified ecological consultant be engaged to review, update and finalise the 2006 Interim Management Plan, and develop this model for the other cemeteries.

The updated plan must deliver the following:

- review and finalise environmental protection zone (EPZ) boundaries for each cemetery;
- provide clear, zone-specific management guidelines (for example: Zone 1 for burials and access paths, Zone 2 for buffers, Zone 3 for conservation areas);
- specify operational requirements for mowing, weed control, chemical usage, grave maintenance and access in each zone, as appropriate;
- design appropriate interpretive signage;
- prepare action tables identifying operators with responsibilities for implementation of actions;
- provide adequate training to operators to ensure that there is an understanding of the sites' conservation values;
- ensure that any plans include site-specific provisions and maintenance standards.

Further issues of concern include:

- Will further community consultation occur for any proposed changes to cemetery masterplans?
- What is the long-term future of burials in the cemeteries as they may affect high quality vegetation and habitats?
- Does Yass Valley Council have provision or plans to acquire additional land for extensions to the cemeteries, or alternatively, develop new cemeteries to avoid pressure on the high-quality vegetation and habitats as human population increases?
- Will the revised plans recognise high value trees (i.e., those with habitat value for fauna – especially those with hollows), though the trees may not actually belong to the endangered ecological community?
- The plan must outline safe use of herbicides in the high-quality areas to avoid off-target spraying.

In conclusion, the Draft Yass Valley Cemeteries Management Plan must explicitly protect and manage the cemeteries' remnant woodlands and grasslands, members of critically endangered ecological communities, and the threatened and declining species that they support.

This would be facilitated by finalising and adapting the 2006 Murrumbateman Interim Management Plan and adapting it for the other cemeteries. Updated mapping and the works undertaken by a professional ecological consultant go some way to ensure that Council meets its legislative obligations in undertaking cemetery operations.

Yours sincerely,

SIGNED

Prof Jamie Pittock
President, Friends of Grasslands
30 October 2025

SIGNED

Dr Simon Copland
Chief Executive, Conservation Council ACT Region
30 October 2025