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Planning Officer
Planning and Assessment Unit
NSW National Parks and Wildlife Service
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Dear Planning Officer,

Re. Queanbeyan Nature Reserve draft plan

Friends of Grasslands (**FOG**) and the Conservation Council ACT Region (**Council**) (together, '**we**') thank you for the opportunity to comment on the draft plan (**Plan**) for the Queanbeyan Nature Reserve (**Reserve**).

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 Council 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.

We appreciate the Plan's explanation of the regional context which covers well the values, management and use of, and the historic threats to the Reserve and its situation abutting the NSW/ACT border in the lower slopes of the broad U-shaped Jerrabomberra Valley.

We note the following threatened and significant bird species found in the Reserve¹ are not mentioned:

- Gang-gang Cockatoo, *Callocephalon fimbriatum* - Endangered in NSW and under national law²
- Scarlet Robin, *Petroica boodang* - Vulnerable in NSW³
- Diamond Firetail, *Stagonopleura guttata* - Vulnerable in NSW and under national law⁴
- Latham's Snipe, *Gallinago hardwickii* - Vulnerable and Migratory under national law⁵
- White-winged Triller, *Lalage tricolor*.

¹ https://ebird.org/hotspot/L8666293/bird-list?hs_sortBy=taxon_order&hs_o=asc

² https://www.environment.gov.au/cgi-bin/sprat/public/publicspecies.pl?taxon_id=768;
<https://threatenedspecies.bionet.nsw.gov.au/profile?id=10975>

³ <https://threatenedspecies.bionet.nsw.gov.au/profile?id=20133>

⁴ https://www.environment.gov.au/cgi-bin/sprat/public/publicspecies.pl?taxon_id=59398;
<https://threatenedspecies.bionet.nsw.gov.au/profile?id=10768>

⁵ https://www.environment.gov.au/cgi-bin/sprat/public/publicspecies.pl?taxon_id=863;
<https://threatenedspecies.bionet.nsw.gov.au/profile?id=20465>

We note information is available about two biobanking agreements that encumber land totalling just under 120 hectares south of the Reserve.⁶ It is our understanding these areas must be managed as private protected areas under the biodiversity stewardship agreement provisions of the *Biodiversity Conservation Act 2016*.⁷ We understand credits with the status 'Issued' can be retired to endow the management of these properties.

One aspect not explicitly mentioned concerns a relevant long-running landscape-scale 'strategic assessment' planning and regulatory process nearing completion on the ACT side of the border.⁸ Based on a letter from the ACT Planning Minister to members of the ACT Legislative Assembly dated 14 May 2026 (enclosed), we expect public comment will be invited on the ACT Government's Eastern Broadacre Strategic Assessment (**EBSA**) in 2027; following that consultation, decisions will shape forever development in and conservation of the lower Jerrabomberra and Majura valleys.

On matters regulatory, we note 'park-specific policies' state clearly uses that will be prohibited and allowed in the Reserve. For public awareness, we consider it may be useful to specify that hooved animal grazing is a management option that may be used in the Reserve to control biomass in the kangaroo enclosure.

As a plan, we note the objectives and strategies are expressed at a high level; unlike earlier plans, there is no management action table setting out what needs to be done, by whom and when. We are concerned, absent this specific detail, managers of the Reserve may find it more difficult to obtain resources. We also understand that, if this is how management plans are completed these days, a new approach will be needed in our advocacy aimed at obtaining sufficiency in resource commitments for protected area management.

The Plan would benefit from some more-specific information on long-term trends in pressures and attribute condition. As drafted, the public would not know there exists a sound baseline of the diversity in the Reserve. We know this as, for example, former NSW National Parks and Wildlife Service staff member Rainer Rehwinkel now assists our organisations. We know he surveyed a substantial number of full floristic plots starting in the late 1990s and up to 2015. The data captured is visible in the NSW Bionet Wildlife Atlas⁹. Continuing this example, even if things 'look normal', datapoints need periodic re-sampling, employing the same standard data collection methodology, and analysed using the Floristic Value Score method, to detect change in the Reserve's floral diversity since its establishment.

We would like to see a minimum commitment to monitoring specified for the Reserve's flora and threatened fauna species including reptiles, invertebrates and birds; this could be explicit and achieved in the context of monitoring planned at a regional level. This is needed as, absent *any* regular monitoring, managers will not have the information essential to informing the active and adaptive management of threats planned to maintain and restore Reserve values.

The intentions to adopt a cooperative approach, engage with other land managers, participate in cross-tenure programs and share information are all welcomed; recognising this has been occurring to date, long may it continue. All these measures will assist in building an appreciation and understanding of the grassy ecosystem values protected and presented in the Reserve. We support visitation to and use of the reserve for research.

⁶ Biobanking Agreements 309 and 310 are published on the Biobanking Register: www.environment.nsw.gov.au/bimsprapp/SearchBiobankingAgreement.aspx; in turn, the biodiversity credit register (www.environment.nsw.gov.au/bimsprapp/SearchBiodiversityCredit.aspx) shows multiple ecosystem and species credits created and issued to Robin Pty Ltd when the agreements were executed remain at the status 'Issued'.

⁷ *Biodiversity Conservation (Savings and Transitional) Regulation 2017*, s 13

⁸ Department of Climate Change, Energy, the Environment and Water (online) Eastern Broadacre strategic assessment, www.dcceew.gov.au/environment/epbc/approvals/strategic-assessments/act-eastern-broadacre

⁹ under the prefix "GEDB ... " (Grassy Ecosystems Database)

The development and conservation decisions to be made under national environmental law following the EBSA are a catalytic opportunity. Relevant to two Plan themes:

- contributing to the conservation of a broader grassy landscape, and
- supporting appreciation of the park and its values,

please be aware we will be campaigning for the Federal Environment Minister to require the establishment and secure the resourcing, for the long term, of a border and tenure blind 'conservation management network' dedicated to the better protection and management of grassy ecosystems throughout the Jerrabomberra and Majura valleys. Based on outcomes elsewhere, we are confident this will be an outcome of the process.

Should any *broad*-scale industrial development ensue, it will increase the already high and accelerating risk of extinction for the threatened:

- ecological community 'Natural Temperate Grassland of the South Eastern Highlands', which is protected in the ACT and under national law at the level 'critically endangered' (**NTG**)
- Canberra Grassland Earless Dragon (**Canberra Dragon**), arguably *the* most threatened species in Australia. Canberra Dragon is protected in NSW, the ACT and under national law at the level 'critically endangered'.

If *broad*-scale industrial development is to occur, then given their risk of extinction and conservation dependence, we will be campaigning hard for the strict protection and resourced management of the already-fragmented NTG and Canberra Dragon populations.

Even if development is to occur on a more modest scale, we expect a conservation management network may be something willing neighbours on Territory Land and National Land in the ACT, and in NSW, will get involved in to promote the achievement of good conservation outcomes across the two catchments.

Given all the foregoing, we urge you to confirm, over the life of the Plan, that Reserve managers will be ready and able to respond to an increase in resourcing available, including an increase in capacity to engage, support and enable volunteers. Groups like FOG, Queanbeyan Landcare and the National Parks Association are likely sources of assistance.

In short, we encourage you to consider whether you need to be more ambitious in this Plan. It is our hope, with volunteer assistance, that during the life of this Plan everyone acting together will, for example, scale up and realise the benefit of successful grassland restoration trials; enhance the habitat values of the site's box-gum grassy woodland by restoring the site's value as bird habitat (e.g., by planting wattles, *Acacia spp.*); and/or thin excessive eucalypt regrowth to restore a more open-structured woodland.

Yours sincerely,

SIGNED

Jamie Pittock
President, Friends of Grasslands

9 June 2026

SIGNED

Dr Simon Copland
Chief Executive, Conservation Council ACT Region

9 June 2026