

Ms Carma Sweet
Director, Policy & Planning,
Urban Treescapes Section
City and Environment Directorate
Carma.Sweet@act.gov.au

Re. Municipal Infrastructure Standard 25 Plant Species for Urban Landscape Projects (Ed 1 Rev 2)

Dear Ms Sweet,

Friends of Grasslands (**FOG**) and the Conservation Council ACT Region (**Council**) (together, '**we**') appreciate the opportunity to comment on the above revised document (**MIS 25**).

MIS 25 includes objectives to:

- minimise future management problems;
- provide plant species which are best suited to the ACT climate and resilient to future climate change.

We are concerned that inclusion of some species listed will likely continue to create future management problems, i.e., those species identified previously as "sleeper weeds" (identified in Attachment 1). These species are already invading public areas and nature reserves. It is highly likely plant species identified as sleeper weeds will become even *more* invasive in a changing climate.

We urge you and the ACT Government as a whole to demonstrate responsible ecological leadership by *not* using and promoting invasive species. Invasive species are already a resource drain for government staff and landcare volunteers managing nature reserves and landcare project sites. It devalues their work as they battle weeds such as firethorns, *Pyracantha* spp., cotoneasters, *Cotoneaster* spp., as well as other invasive plant species commonly planted in Canberra's urban open spaces and gardens many years ago, prior to their removal from government planting lists and nursery stocklists.

We note with approval that MIS 25 now has a section on ecological landscape considerations, and that some of the sleeper weeds are now recognised as "species plants and restricted use plants" that will be "limited to particular applications and locations within Canberra's environment and urban landscapes. All special plant species require written approval from CED prior to planting".

In our view, a better approach would be to phase out using sleeper weeds because of the ease of dispersal of their seeds, either by wind (in the case of the ashes, *Fraxinus* spp., and Chinese Elm, *Ulmus parvifolius*), or by fruit-eating birds (especially the Pied Currawong), in the case of Callery Pear, *Pyrus calleryana*. A large bird like a currawong can fly several kilometres with its crop full of seeds before it will disperse those seeds in an urban park or nature reserve; as a result, limiting the use of these plant species to particular distances from such areas (exclusion zones) is inadequate.

We note that the document states "all planting within, or adjacent to, high-value ecological communities should aim to utilise planting stock that is grown from Southern Tablelands provenance"

(underline added). This requirement should be modified by adding that locally indigenous species should be carefully sited to ensure that they are appropriate to the topographical position.

We reiterate our concern that the sleeper weeds, particularly the ashes, *Fraxinus* spp., Chinese Elm, *Ulmus parvifolia*, and Callery Pear, *Pyrus calleryana*, should be phased out of use via MIS 25.

Of concern too is *Pittosporum tenuifolium* (for more information, please see [Attachment 1](#)).

We note that a number of previously identified sleeper weeds are now on the “Deleted Species List”, including *Agapanthus africanus*, *Arbutus unedo*, *Fraxinus angustifolia* subsp. *oxycarpa*, and two other *Fraxinus* cultivars, *Nandina domestica*, *Pyrus ussuriensis*, two *Ulmus parvifolia* cultivars, and *Viburnum tinus*.

We urge the ACT Government to consider this submission seriously and trust the above-listed sleeper weeds will be removed from the recommended lists and join the deleted species list.

Yours sincerely,

SIGNED

Prof Jamie Pittock
President, Friends of Grasslands

13 July 2026

SIGNED

Dr Simon Copland
Chief Executive, Conservation Council ACT Region

13 July 2026

About us

FOG is a community group dedicated to conserving grassy ecosystems in south-eastern Australia, including natural and temperate grasslands and grassy woodlands. Our members include professional scientists, landowners, land managers, and members of the public, all committed to protecting these landscapes for the long term.

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.



Submission to Urban Treescapes Section in the City
and Environment Directorate

Review of Municipal Infrastructure Standard 25 Plant Species for Urban Landscape Projects (Edition 1 Revision 2)

28 May 2026

The Conservation Council ACT Region is the peak body for environment and climate groups in the ACT Region. We represent close to 50 member groups, bringing together a united voice on environment and climate issues to Government, business and community.

Since 1981 we have been at the centre of the region's most important wins for wildlife, bushland, climate and communities. As a hub for the ACT Region's environment and climate movement and a not-for-profit, non government organisation, we run campaigns, promote and upskill local groups, undertake research, advocate passionately, and engage and inform our community.

For further information please contact:

Simon Copland, Executive Director, director@conservationcouncil.org.au.

Summary

The Conservation Council ACT Region appreciates the opportunity to provide comments to the Urban Treescaping Section regarding the *Municipal Infrastructure Standard 25 Plant Species for Urban Landscape Projects* (Edition 1 Revision 2) (the Standards).

It is important to remove “sleeper weed” species from the Standards. These species are already showing signs of invading into urban parklands and nature reserves.

Of most concern are:

1. Callery Pear, *Pyrus calleryana*,
2. Chinese Elm, *Ulmus parvifolia*, and
3. ash species, *Franxinus* spp.

These species are being recorded spreading into and abundant in natural areas throughout the ACT; the enclosed tables and photos are ample evidence of this issue. Once established as mature trees, the risk is that further spread will continue. This will place a serious financial burden on the ACT Government and Landcare groups. The ACT Government and Landcare groups are already tackling invasive woody weeds, spending their limited resources to control these species. Attachment 1 provides details of records of these species as well as photos showing that there are already large specimens resulting from prior invasions that are now producing seeds ready to be dispersed further. Note that a further systematic survey will reveal many more instances of all three of these species having invaded throughout Canberra.

The Pied Currawong, *Strepera graculina*, is a known disperser of seeds of invasive species. This bird eats berries (including those produced by Callery Pear) then flies off to find a suitable perch from where it regurgitates the seeds in the form of pellets. These seeds remain viable, having not passed through the birds’ digestive tract.

Currawongs are known nest predators that have deleterious effects on small birds, especially in the breeding season. Birdlife Australia has collated information on Pied Currawong population increases due to increases of food-sources (in the form of berry-bearing trees and shrubs) and their predatory habits¹. The Pied Currawong’s effects on a vulnerable bird, the Scarlet Robin, *Petroica boodang*, is well-documented.²

The seed-dispersal distances in the Standards are unrealistic. Large fruit-eating birds, such as the Pied Currawong, have the ability to fly far greater distances than 500 m with seeds of invasive species in their systems prior to being voided. Wind-dispersal distances are likely to be far in excess of 100 m.

In addition, plantings adjacent to natural areas should always aim to use locally indigenous species. The Suburban Land Agency has funded Ginninderra Catchment Group to develop a species selection guide that will enable more effective selection of local species for planting in such areas.

Additionally, there is a set of species that may have other deleterious effects on local bird populations. Plant species that favour aggressive nectar feeders such as the Noisy Miner, *Manorina melanocephala*, and Red Wattlebird, *Anthochaera carunculata*, should be deleted from the lists. Plant species in this category include red-flowered *Callistemon* spp. and *Grevillea* spp., and *Banksia ericifolia*. Birdlife Australia has information on these species.³

There are other berry-bearing trees and shrubs in the Standards that birds eat and disperse. Plant species in the genera *Crataegus* and *Prunus* do not provide useful forage for any of the

¹ www.birdsinbackyards.net/Birds-Behaving-Badly-Pied-Currawong

² See Scarlet Robin entry in volume 6 of: Marchant, S. & Higgins, P.J. (Coordinators). (1993–2006). *Handbook of Australian, New Zealand and Antarctic Birds*. Oxford University Press.

³ www.birdsinbackyards.net/Birds-Behaving-Badly-Pied-Currawong;
www.birdsinbackyards.net/content/article/Gardening-Grevilleas

smaller declining passerine bird species, and only serve to provide food for currawongs, parrots and cockatoos. Exotic plant species should not be identified in the Standards as being useful food-sources for native animal species; rather, they should be removed from the lists.

It would be disappointing if the final Standards were to advocate the use of species that are either invasive or deleterious to native fauna. This is especially so given the ACT Government and Landcare groups are 'out there' battling species like firethorns, *Pyracantha* spp. and cotoneasters, *Cotoneaster* spp., which were commonly planted many years ago. As awareness increases, nature needs the Standards to reflect best practice.

- These species are no longer offered for sale by local nurseries.
- Years ago, these invasive species (along with other plants) were given away by the Government Nursery at Yarralumla to all new home-owners as part of a government scheme (10 Trees and 40 Shrubs).
- In a recent project offered to Lawson Landcare Group, the ACT Government funded a contractor to remove invasive species along Ginninderra Drive. This took three days of effort by a team of workers. Plants removed during these works included Callery Pear, ash species and firethorns.

Recommendation

We recommend that **sleeper weed species are removed from the Standards.**

Dataset 1. Analysis of incidences of *Fraxinus* spp. (a sleeper weed) from CMN records and recently collected data from R. Rehwinkel (ecologist)

Records already in Canberra Nature Map (CNM)	No. of records	No of CNM locations	Total number of plants (minimum value from CNM)
<i>Fraxinus angustifolia</i>	42	37	433
<i>Fraxinus pennsylvanica</i>	4	3	9
<i>Fraxinus</i> sp.	55	39	211
All <i>Fraxinus</i> spp.	101	79	653

***Fraxinus* sp. R. Rehwinkel records (not entered on CNM yet)**

No. of plants	Date	Records
1	11/10/2023	Ginninderra Dr, woodland to east of University of Canberra Hospital
1	14/10/2023	Wetlands north and south of Eardley St
20	19/11/2024	Corner Ginninderra Drive and Baldwin Drive
4	22/11/2024	Umbegong Regional Park, below Denny St
2	22/11/2024	Umbegong Regional Park, downstream of stepping stones, N of Ginninderra Creek
3	22/11/2024	Umbegong Regional Park, near stepping stones, N of Ginninderra Creek
2	3/12/2024	Lyneham Microforest, Wattle St
80	28/01/2025	Baldwin Dr adjacent to Lawson North, north of Mcleod St
70	28/01/2025	Baldwin Dr adjacent to Lawson North, north of Mcleod St
12	28/01/2025	Baldwin Dr adjacent to Nevertire St
1	2/12/2025	Feeder road between Parkes Way and Caswell Dr
15	2/12/2025	Parkes Way between tunnel and base of Black Mountain
5	11/12/2025	Clunies Ross St between Parkes Way and ANBG
1	11/12/2025	Ginninderra Dr between Braybrook St and Haydon Dr
10	11/12/2025	Clunies Ross St between ANBG and Dickson Rd
60	11/12/2025	Parkes Way/Lady Denman Drive, below Black Mountain
287		16 records

TOTAL	No. records	No. of plants
<i>Fraxinus</i> sp.	117	940

Dataset 2. Analysis of incidences of *Pittosporum tenuifolium* (a sleeper weed) from CMN records and recently collected data from R. Rehwinkel

Records already in Canberra Nature Map (CNM)	No. of records	No of CNM locations	Total number of plants (minimum value from CNM)
<i>Pittosporum tenuifolium</i>	26	5	72

***Pittosporum tenuifolium* R. Rehwinkel records (not entered on CNM yet)**

No. of plants	Date	Records
6	4/12/2024	Baldwin Dr adjacent to Lawson North, south of Mcleod St
10	28/01/2025	Baldwin Dr adjacent to Lawson North, south of Mcleod St
16		2 records

TOTAL	No. records	No. of plants
<i>Pittosporum tenuifolium</i>	28	88

Dataset 3. Analysis of incidences of *Pyrus* spp (a sleeper weed) from CMN records and recently collected data from R. Rehwinkel

Records already in Canberra Nature Map (CNM)	No. of records	No of CNM locations	Total number of plants (minimum value from CNM)
<i>Pyrus calleryana</i>	60	15	217
<i>Pyrus</i> sp. (an ornamental pear)	39	17	98
All <i>Pyrus</i> spp.	99	32	315

***Pyrus calleryana* R. Rehwinkel records (not entered on CNM yet)**

No. of plants	Date	Records
3	9/10/2023	Gungaharra Nature Reserve, Gungahlin Hill, adjacent to Crace
1	9/10/2023	Gungaharra Nature Reserve, open woodland, adjacent to Barton Highway
3	11/10/2023	Ginninderra Dr, woodland to east of Univeristy of Canberra Hospital
1	14/10/2023	Open space to east of intersection of Ginninderra Dr and Wanderlight Ave
2	14/10/2023	Wetlands north and south of Eardley St
15	7/06/2024	University of Canberra, she-oak plantation adjacent to playing fields in area bounded by Ginninderra Dr and Haydon Dr
1	19/11/2024	Corner Ginninderra Drive and Baldwin Drive
20	4/10/2025	Lawson North, in woodland north of Jumbuck St
20	2/12/2025	Ginninderra Dr, between Braybrook St and Baldwin Dr, S side
3	2/12/2025	Ginninderra Dr, between Braybrook St and Gungahlin Drive, N side
69		10 records

TOTAL	No. records	No. of plants
<i>Pyrus</i> spp.	109	384

Dataset 4. Analysis of incidences of *Ulmus parvifolia* (a sleeper weed) from CMN records and recently collected data from R. Rehwinkel

Records already in Canberra Nature Map (CNM)	No. of records	No of CNM locations	Total number of plants (minimum value from CNM)
<i>Ulmus parvifolia</i>	26	13	75

***Ulmus parvifolia* R. Rehwinkel records (not entered on CNM yet)**

No. of plants	Date	Records
1	3/10/2023	Eastern side of Molonglo R, opposite Namarag Park
1	5/10/2023	Mount Painter NR, above Skinner St
1	14/10/2023	Uni of Canberra, adjacent to playing fields in area bounded by Ginninderra Dr and Haydon Dr
1	22/11/2024	Umbegong Regional Park, downstream of stepping stones, N of Ginninderra Creek
1	22/11/2024	Umbegong Regional Park, near pipeline crossing of Ginninderra Creek
2	3/12/2024	Lyneham Microforest, Wattle St
4	28/01/2025	Baldwin Dr adjacent to Nevertire St
2	2/12/2025	Feeder road between Parkes Way and Caswell Dr
3	2/12/2025	Creswell Dr adjacent to Aranda Bushland
50	11/12/2025	Parkes Way/Lady Denman Drive, below Black Mountain
4	11/12/2025	Caswell Drive between Glenloch Interchange and Arboretum
1	11/12/2025	Gungahlin Drive between Belconnen Way and Ginninderra Drive
71		12 records

TOTAL	No. records	No. of plants
<i>Ulmus parvifolia</i>	38	146

Photos



Callery Pear, *Pyrus calleryana*, at West Belconnen Pond. Left: a large tree within the immediate vicinity of the ponds, amongst planted eucalypts, *Eucalyptus* spp. There were some 20-30 smaller specimens surrounding the ponds. Middle: a smaller example growing near the ACT-NSW border, some 420 m from the nearest street at the adjacent suburb of Dunlop. This tree was amongst a few smaller specimens. Right: the fruit of the tree shown in the middle photo.



A mature Callery Pear growing in a semi-natural area along Ginninderra Way, c. 210 m west of Wonderlight Ave, Lawson. The tree had remnants of fruits. This specimen is some 700 m from the suburb of Kaleen, its likely source (i.e., the location of the nearest Callery Pear trees that were the likely parents of this mature tree).



A mature Chinese Elm, *Ulmus parvifolia*, growing along Ginninderra Drive just east of the intersection with Wanderlight Ave, Lawson. The photo at the right shows seeds, ready to be dispersed by the wind.





The above 12 pictures show a cluster of eight ash trees, *Fraxinus* sp., growing adjacent to a drainage line in a semi-natural area at the corner of Ginninderra Dr and Baldwin Dr. These trees were heavily in fruit and are the likely source of seedlings that are continually emerging in the surrounding area, and that were the subject of an ACT Government-funded weeding contract (as described in the text above).