



**CONSERVATION
COUNCIL** ACT REGION

Submission to Infrastructure Canberra

Proposed Sustainable Alternative for the Canberra Aquatic Centre at Commonwealth Park

November 2025

The Conservation Council ACT Region 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 for our region. We harness the collective energy, expertise, and experience of our more than 40 member groups to promote sound policy and action on the environment.

We campaign for a safe climate, to protect biodiversity in our urban and natural areas, to protect and enhance our waterways, reduce waste, and promote sustainable transport and planning for our city. Working in the ACT and region to influence governments and build widespread support within the community and business, we put forward evidence-based solutions and innovative ideas for how we can live sustainably.

At a time when we need to reimagine a better future, we understand that the changes we need will only happen with the collective support of our community.

For further information, please contact:

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Introduction

The Conservation Council ACT Region appreciates the opportunity to provide comments on the proposed Canberra Aquatic Centre in Commonwealth Park. We believe the development of new community infrastructure aligns with Canberra's vision for a sustainable and active city, which should be commended. In saying this, such projects must also be designed with full consideration of their ecological context. The current proposal presents potential impacts on local wildlife, particularly on the Grey-headed Flying-fox population that inhabits and forages in the surrounding area. We believe consideration of this population needs to be taken into account in the construction and operation of the Aquatic Centre in Commonwealth Park.

Background

Commonwealth Park is a vital habitat for the ecologically important flying-foxes. The Grey-headed Flying-fox has been an annual seasonal resident since 2003. Flying foxes provide important ecological functions: they are key seed and pollen dispersers in forest ecosystems. However, due to declines in the population of over 30% since the 1980s, Grey-headed Flying-foxes are considered a vulnerable species under the *Environment Protection and Biodiversity Conservation Act 1999*.

Commonwealth Park has the only flying-fox camp or colony in the ACT. Since 2016, more than 2,500 flying-foxes have resided in the park during the summer, with a peak of 9,159 Flying-Foxes in March 2021. Flying foxes usually reside in the park for seven to eight months of each year, between October and May, before moving further north during winter. It is worth noting that this is the same time period as a pool in the area is likely to have the highest visitation numbers. In some years, a handful of flying foxes remain in Commonwealth Park throughout the winter. As the loss of native bush continues across the eastern part of Australia, urban areas are becoming more important to flying foxes as they provide important foraging resources. This brings flying foxes in closer proximity with humans and potentially increases the likelihood of human/wildlife conflict.

A common misconception is that bats "swoop" people. Unlike birds, flying foxes must drop and turn prior to take-off, which can be mistaken for swooping when people are nearby. This misconception can add to the fear people have when they see flying foxes leaving the trees in the park and dipping into a community pool near them.

Implications of The Proposed Canberra Aquatic Centre

The proposed Canberra Aquatic Centre will bring larger numbers of the community closer to the Grey-headed Flying-fox camp in Commonwealth Park. The placing of any outdoor water space near the camp is likely to create some issues, both potential health risks, additional cleaning due to faeces and urine spread in the area, and may also increase negative community attitudes to this vulnerable species.

Flying foxes live near open water so that they can drink by 'belly dipping', as they leave their camp in the evening. They swoop down to a water source, dip their belly fur in, then land in a

tree and lick the water from their fur, or sometimes even lick their fur as they fly. Currently, these flying foxes dip into Lake Burley Griffin and Nerang Pool.

If an open-air pool is built in proximity to their camp, some flying foxes are likely to dip into the Aquatic Centre pool as an alternative, particularly given its closeness to the current camp in Commonwealth Park. If the pool is open at sunset or later in the evening, there is a risk that there are encounters between swimmers and flying foxes. In the event of any member of the public or staff member being scratched or bitten by a flying fox, they would need to seek immediate medical attention (see further information below). The flying foxes are also likely to defecate in the area, creating additional cleaning, which may add to concerns about public safety and health.

While this presents some risks, putting a pool so close to the current flying fox population also has important educational benefits as people have greater exposure to this beautiful and ecologically important species. We believe the Government should take the construction and operation of this Centre as an opportunity to educate the public about this population, helping increase understanding of the local flying fox camp, reduce myths about the species and minimise health risks to the community.

Disease Concerns

Concerns of disease in the ACT relate mostly to the Australian Bat Lyssa Virus (ABLV), which is closely related to, but distinct from, the rabies virus. ABLV can infect people and other mammals with a fatal outcome. ABLV infection has led to the deaths of four people and two horses in Australia.

Whilst both flying foxes and some insectivorous bats can carry ABLV, infection in the healthy wild population is rare, infecting less than 1% of the bat population. Humans cannot be infected with ABLV via bat urine, faeces, or partially eaten fruit. ABLV is carried in the saliva of an infected bat, meaning a bite or scratch from an infected bat is the most likely pathway for transmission to occur. There is no infection risk for people if they follow the advice “don’t touch bats”. In the event of a bat bite, scratch, or other significant contact, the person must seek medical attention urgently, as immediate treatment is required.

Recommendations

Given the health and other associated risks associated with interactions between the flying fox camp and the Aquatic Centre, we advocate that the Government develop strategies to reduce the risk of bats flying into the Aquatic Centre facility and in turn to protect flying foxes.

The first, and most obvious solution, would be to identify a different location for the pool, further away from the flying fox camp. However, we also note the centrality of this location, particularly its proximity to a future light rail stop after the completion of Stage 2a. We agree with the importance of having a pool in the city and recognise the value of having outdoor water areas included in the facility (although not having outdoor water facilities would be an ideal way to stop interactions).

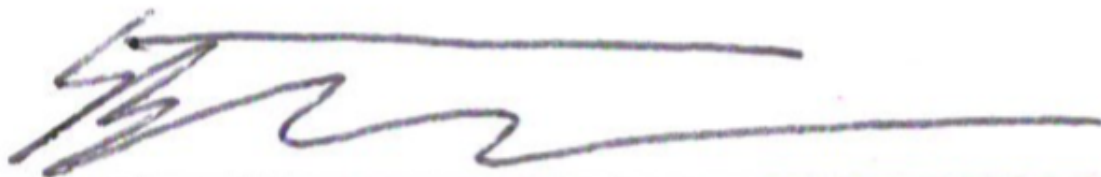
Given this, we believe that two other options are available if construction of the Aquatic Centre goes ahead in the proposed location:

1. Barriers/covers that prevent the flying foxes from flying into the area are erected. These must be designed to be easily visible at night and not trap or injure the bats.
2. The ACT Government includes educational information about the flying fox camp in the Aquatic Centre, both during construction and operation. This should include educational materials about the species, its ecological importance, the health risks associated with interactions with animals, (particularly tackling myths associated with the species) and information about how to interact with an animal if and when there is an encounter. Such educational material will be essential to reduce fear with the species and ensure encounters do not result in health risks and risks to the species themselves.

Sensitivity during construction

It is also essential the ACT Government ensure best practices are followed so that the flying fox camp is not disturbed during construction. Construction periods can be disturbing for local species, and this can have long term impacts on their viability in their habitat. We suggest the ACT Government work with groups such as ACT Wildlife to ensure strong practices to protect the camp during construction, including education for workers on the species and how best to interact with it if encounters occur.

Signed,

A handwritten signature in black ink, appearing to read 'Simon Copland', written over a light blue horizontal line.

Simon Copland

Conservation Council Executive Director