



**Conservation Council  
of South Australia Inc**

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17 March 2006

The Chief Executive  
Alexandrina Council  
PO Box 21  
Goolwa, SA 5214

By email: [alex@alexandrina.sa.gov.au](mailto:alex@alexandrina.sa.gov.au)

Dear Sir/Madam

**Adelaide Blue Gum Pty Ltd proposal at Waldaree Tree Farm – 455/456/05**

The Conservation Council of South Australia wishes to express its concern regarding the above development proposal.

In this application, the proponents propose building several strands of blue gum plantations adjacent to and upstream from Fleurieu Peninsula Swamps, ecological communities considered to be critically endangered (listed as a Threatened Ecological Community – TEC) and therefore a matter of National Environmental Significance (NES matters) under the Commonwealth Government's *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Our main reason for concern is that the development application, as currently lodged, does not acknowledge this, nor does it show how the swamps will be protected from the likely negative impacts of the establishment, maintenance and harvesting of the blue gums trees.

According to our records, most of the swamps near the proposed development are already in a somewhat degraded state, yet still have the capacity to recover. Without the proponent taking the proper precautions to protect these swamps during all phases of their planned operation, we are concerned that these unique ecological assets may be damaged beyond repair.

We therefore strongly recommend that the proponent supplies more information with their application, demonstrating their recognition of the potential impacts this development could have on the swamps, as well as the strategies they are putting in place to mitigate these impacts. At a minimum, the additional information would need to demonstrate that the following matters are assured:-

- The site preparation will not affect swamp vegetation and fauna, either by direct removal or damage, by accidental poisoning through herbicide use or through fertilizer run-off. Moreover, it will not contribute to erosion in areas adjacent to the swamps potentially resulting in a build up of silt which could affect their hydrology.
- Once established, the plantation will not affect the environmental water requirements of the swamps (both surface and ground water) nor will the canopies of the blue gums affect swamp vegetation by shading it out. Additionally, fertilizer will be prevented from running off and affecting swamp vegetation and fauna.

- The grazing proposed in the plantation will not seriously affect the swamp vegetation, especially after the blue gum canopies have been established and the vegetation directly underneath becomes sparser.
- The harvesting will not damage swamp vegetation and fauna when the blue gums are chipped on site or removed for processing. Additionally, this harvesting will not affect the swamp hydrology by causing erosion in areas adjacent to the swamps or by large amounts of debris from falling trees/or wood chips from processed logs entering into the swamp.

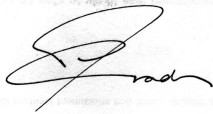
In the absence of having this information, we think this development should be declined on the basis that it currently poses too much risk to the swamps in the vicinity.

We recognize that asking for this entails much more work from the proponent than they have provided to date. Additionally, we recognize that if the proponent is able to provide this additional information, Alexandrina Council will have to assess whether it deals adequately with the concerns voiced above. We believe, however, that the extra effort is necessary for the protection of the Fleurieu Peninsula Swamps at a local level and to help Alexandrina Council meet its obligations under its Corporate Plan 2004-2009, particularly in relation to goal 10 - *Sustainable and integrated land-use planning*.

A representative from CCSA would be willing to appear before the Council in support of this submission.

Thank you for taking our submission into account in this matter. Should you have any questions or need further information, please do not hesitate to contact me.

Sincerely



Michelle Grady  
CEO  
Conservation Council of South Australia Inc