



Blue Mountains Conservation Society Inc

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Nature Conservation Saves for Tomorrow

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Ecological Communities Section Department of Environment
By email: <epbc.nominations@environment.gov.au>

Coastal Upland Swamps in the Sydney Basin Bioregion

BMCS wishes to register its strong support for listing *Coastal Upland Swamps in the Sydney Basin Bioregion* as an endangered ecological community. BMCS endorses recognition of this community as separate from the already-listed '*Temperate Highland Peat Swamps on Sandstone*' (*THPSS*) ecological community. It is critical that the full spectrum of *Coastal Upland Swamps (CUS)* is captured by the listing description. However, the Society does not have the degree of expertise available at relatively short notice to provide details of the various *CUS* types.

Debate about the elevation which separates *THPSS* from *CUS* is unlikely to be productive. It is sufficient to note that the selected 600m elevation is a useful construct for which there is a degree of consensual support. From a practical viewpoint, as both community types will be listed, protection of the total spectrum of *CUS* and *THPSS* communities will be assured.

Is the draft description for the *CUS* ecological community appropriate to identify the ecological community in the field? BMCS considers that it most definitely is, provided that common sense is applied by those in the NSW and Federal Governments charged with assessing submissions by 'captive' consultants. Unfortunately, expert consultants use semantic arguments to oppose the existence of an ecological community in an area proposed for mining or CSG extraction.

With the above in mind, the Society is a little concerned with the use of 'upland' in the case of *CUS*. BMCS understands that this swamp category can exist at very low elevations (say in the order of about 20 m), so the emphasis on 'upland' is conceptually too restrictive. Indeed, there could be merit in just referring to the community by the name listed under the NSW Threatened Species Act. After all, from what seems to be happening in terms of devolution to the NSW State of the Federal Government's responsibilities under the EPBC Act, there could be some merit in a single listing process and the same name.

Dr Brian Marshall,
For the Management Committee.