



Blue Mountains Conservation Society Inc

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Nature Conservation Saves for Tomorrow

Wednesday 12th November, 2014

The Director
Terrestrial Species Conservation Section
Wildlife, Heritage and Marine Division
Department of the Environment

Dear Sir/Madam,

RE : *Callistemon megalongensis* (Megalong Valley Bottlebrush)

The Blue Mountains Conservation Society is a not-for-profit conservation organisation with some 850 members. The Society supports the recommendations of the NSW Scientific Committee to list *Callistemon megalongensis* as a "Critically Endangered Species" under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The NSW Scientific Committee have identified many reasonable conclusions on why this species should be added under Clause 7 of the *Threatened Species Conservation Regulation 2010:*" (NSW Scientific Committee). *Callistemon megalongensis* is already currently listed as critically endangered under the Threatened Species Conservation Act 1995 (NSW state legislation) and federal listing is a must.

Callistemon megalongensis has been identified by the NSW Scientific Committee as a Critically Endangered species due to its restricted geographic distribution and other conditions. Due to the special niche environment that *C. megalongensis* occurs in, this listing must be given high priority protection. Firstly, its small "known" distribution is on only 8 sites within a small 8km² area found entirely within the Megalong Valley on Crown and private land, with only a small part of the population located within the protected Blue Mountains National Park. This extremely restricted distribution of an endemic Blue Mountains relic deserves the utmost protection by the governing bodies responsible for its protection. This species warrants the legal guardianship afforded by listing to safeguard it within or outside protected areas.

As stated by the NSW Scientific Committee:

***Callistemon megalongensis* (Craven & S.M. Douglas) Udovicic & R.D. Spencer is eligible to be listed as a Critically Endangered species as, in the opinion of the Scientific Committee, it is facing a very high risk of extinction in New South Wales in the near future, as determined in accordance with the following criteria as prescribed by the Threatened Species Conservation Regulation 2010:**

Clause 7 Restricted geographic distribution and other conditions.

The geographic distribution of the species is estimated or inferred to be:

(a) very highly restricted,

and:

(d) a projected or continuing decline is observed, estimated or inferred in either of the key indicators:

(a) an index of abundance appropriate to the taxon, or

(b) the geographic distribution, habitat quality or diversity

The lack of conservation management on private lands contributes some of the major threats to the survival of *C. megalongensis* :

- Grazing cattle graze & trample this species, stopping recruitment of new seedlings and damaging established trees;
- Damage along tracks from trail-bikes, recreational vehicles and horse-riding;
- The hostility of some landholders to 'outsiders' and authorities due to fears about intervention because of this species, has led to access being barred to some properties. One property owner has released pigs that are destroying a riparian swamp (S. Douglas - pers. comm.);
- The continued lack of listing will allow future DAs to be approved that do not ensure protection of *C. megalongensis* from a variety of threats including dams & drainage works and possible genetic contamination from non-endemic introduced species.

A community education program could be of assistance once the species is listed.

Authorities have also contributed to the Threatening Processes with inappropriate lopping of trees by *Endeavour Energy* contractors, road works, inadequate weed control along road verges, etc. and insensitive bushfire management at times.

The ecology of *Callistemon megalongensis* and its limited spatial distribution alone, without the added pressure of anthropogenic threats, warrants its listing as Vulnerable. With its distribution found mostly outside of protected conservation areas of the Blue Mountains National Park estate, the need to protect this small remaining population is of high priority. The Threatened Species Scientific Committee have already identified this small restricted population as a key element in the species protection. (NSW Scientific Committee 2010).

Many of the flora species within the Sydney Bioregion are documented to be important resources for many fauna species and many of its flora species may well be Keystone Species that those fauna species are critically dependent upon. It is stated that the current knowledge on the majority of these fauna species is much less documented than that of the flora. This also intensifies the need for better protection as many of these less documented fauna species may well be dependent on *C. megalongensis* as Keystone Species in their niche habitat and may well not survive as prolifically in other Ecological Communities.

An example is many resident and migratory honeyeater bird species of the Blue Mountains are known to use nectar producing plant species within the Blue Mountains region as food sources all year round and during migration. These resident and especially migratory honey eaters are one of the many natural spectacles of the Blue Mountains environment and may

well depend on this species as a Keystone food source, especially during stressful migration periods.

Certainly with this in mind, the precautionary principle must be observed and the highest order of protection must be granted to this species.

Regards,

Mr Nakia Belmer

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