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Nature Conservation Saves for Tomorrow

3 February 2019

Ms Lisa Menke
Area Manager
National Parks and Wildlife Service
MUDGEE
By email: Lisa.Menke@environment.nsw.gov.au

Dear Lisa,

Wollemi Pine Translocation Proposal

Thank you for the opportunity to comment on National Parks and Wildlife Service (NPWS)'s proposal to translocate WP as part of a research project as set out in the Wollemi Pine Recovery Plan. We understand the aim of the project is "... to reduce extinction risk to the Wollemi Pine in the wild through the establishment of self-sustaining translocated populations within Wollemi National Park" Given that NPWS is considering translocation sites within dedicated wilderness, you are specifically seeking the Society's views on whether we believe there is conflict between the objectives of the Wilderness Act and the Biodiversity Conservation Act, noting that the Wilderness Act is silent on translocations.

The Society does not support translocation into dedicated wilderness. We have serious concerns that wilderness values could be degraded as a consequence of the translocation itself and also that the existing significant ecological values associated with a pristine wilderness site would risk degradation and permanent change for the same reasons. Risks associated with the translocation come from the initial setting up and planting of the pines, for instance, increased site visitation; site disturbance associated with helicopter, walking or other access; soil and site preparation; introduction of new plant material and plant growing medium to the site, and from future ongoing maintenance, monitoring and possibly educational activities. Further, the Society is concerned that degradation of the existing Wollemi Pine sites from pathogens has already occurred and there is no guarantee that future degradation due to the introduction of either the same or other pathogens would not also occur at the new sites.

The *Biodiversity Conservation Act* does not override *the Wilderness Act*. The *Wilderness Act's* Management principles for wilderness areas include managing a wilderness area "...to protect the unmodified state of the area and its plant and animal communities, " (section 9 (a)).

We understand the risk of extinction of the Wollemi Pine in the wild. We do not oppose translocation in itself. However, our concerns indicate the potential for inconsistency with the objectives and management principles of the *Wilderness Act*. As well, the Office of Environment and Heritage's *Wilderness Policy* states at clause 19 that scientific research is permitted "... if it does not diminish the wilderness values ... or it is demonstrably significant and could not be undertaken in non-wilderness areas." It is not clear whether NPWs has already considered conducting the translocations into national park other than dedicated wilderness. Using non-wilderness areas would also remove any possible conflict with the *Wilderness Act*.

Thank you for the opportunity of commenting.

Yours sincerely

A handwritten signature in black ink that reads "Madi Maclean". The signature is written in a cursive style with a long, sweeping tail on the final letter.

Madi Maclean
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Blue Mountains Conservation Society
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cc Kristen Fraser for Blue Mountains Regional Advisory Committee