



Blue Mountains Conservation Society Inc

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Nature Conservation Saves for Tomorrow

Secretariat

NSW Threatened Species Scientific Committee

scientific.committee@environment.nsw.gov.au

18 August 2022

Dear sir or madam,

Preliminary Determination to support a proposal to list the tree *Eucalyptus benthamii* Maiden & Cambage as an ENDANGERED SPECIES in Part 2 of Schedule 1 of the Act

The Blue Mountains Conservation Society (the Society) is a community-based volunteer organisation with 900 members. Our mission is to help protect, conserve and advocate for the natural environment of the Greater Blue Mountains. In fulfilling its mission, the Society advocates for the protection of the Greater Blue Mountains World Heritage Area.

Blue Mountains Conservation Society supports the NSW Threatened Species Scientific Committee's Preliminary Determination to support a proposal to list the tree *Eucalyptus benthamii* Maiden & Cambage as an ENDANGERED SPECIES in Part 2 of Schedule 1 of the Act and as a consequence, to omit reference to *Eucalyptus benthamii* Maiden & Cambage from Part 3 of Schedule 1 (Vulnerable species) of the Act.

Eucalyptus benthamii (Camden White Gum) has a highly restricted geographic distribution and is estimated to have a moderately low population size (4,500 – 10,200 mature individuals). Most (88%) of the extant population is within the Kedumba Valley in Blue Mountains National Park which is an area of particular concern to the Society. The Society notes that this population is also within the Greater Blue Mountains World Heritage Area (GBMWA), as is the poorly known population of this species along the Nattai River in Nattai National Park. The GBMWA (comprising Blue Mountains, Nattai, Wollemi, Yengo, Gardens of Stone, Thirlmere Lakes and Kanangra-Boyd National Parks and Jenolan Karst Conservation Reserve) was inscribed on the World Heritage List in 2000 in recognition of its outstanding natural values. *Eucalyptus benthamii* is an important part of the internationally significant biodiversity of the GBMWA.

The Preliminary Determination states that the main threats to *Eucalyptus benthamii* are habitat loss (land clearing, urban development, proposed raising of the Warragamba Dam wall and construction of other smaller dams), changed hydrology (flood mitigation and proposed raising of the Warragamba Dam wall), weed invasion, and inappropriate fire regimes, and that other threats include habitat degradation caused by feral animals, mowing, inbreeding depression and hybridisation with *Eucalyptus viminalis* (Manna Gum). The Society is concerned about all of these threats. The Society continues to actively oppose the proposed raising of the Warragamba Dam wall because of its likely detrimental impact on biodiversity values, including *Eucalyptus benthamii*, as well as other values of the GBMWA.

The Preliminary Determination does not include Anthropogenic Climate Change as a threat to *Eucalyptus benthamii*. The Society believes that Anthropogenic Climate Change poses a major threat to the species and should be recognised as such in the Determination. The unprecedented severity and extent of the 2019-20 Black Summer wildfires and subsequent floods are clearly a consequence of Anthropogenic Climate Change. Such events threaten *Eucalyptus benthamii* and place it at risk of extinction. The Society recommends that further analysis be carried out on past loss of habitat and population reduction, and that estimates should be quantified for the future percentage loss likely in the Kedumba Valley population if Warragamba Dam wall is raised. The Society further recommends that on-going monitoring of the remaining *Eucalyptus benthamii* should also be undertaken. Such studies would determine if a future reassessment of the species is warranted.

The Society notes that *Eucalyptus benthamii* is currently being grown at the National Arboretum (Forest 30, planted 2007-2008) in Canberra but is unaware of the provenance of the seed from which the trees are derived.

Thank you for the opportunity to comment.

Yours sincerely

A solid black rectangular box used to redact the signature of Madi Maclean.

Madi Maclean
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Blue Mountains Conservation Society
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