

Sydney Zoo - Submission to EIS Exhibition

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I have spent the last decade heavily involved in the environment movement and living in western Sydney I am proud of the green corridor described as the western Sydney parklands. The untouched areas of this corridor exhibit the natural vegetation that the British would have seen in the late 1700's when they explored the area, given the environmental management by aborigines at the time. Managing this asset is critical and once a section of this corridor is given over to commercial development the likelihood it will be returned to its original condition is minimal.

The responsibility of managing this corridor has been delegated to the Western Sydney Parklands Trust by New South Wales Government and the trust has been shown already that it wishes to change and develop the area. It is expected by the trust that by developing this specific site and getting income from the site it will be able to fund self-development of other areas of the green corridor.

Given this context, in relation to the proposal and the exhibited Environmental Impact Statement I have the following concerns:

1. Bio-Security Management:

This African themed park has three declared environs that they will create: South East Asian Tropical, African Grasslands and Cumberland Plain Woodland, In *Section 3.1* it is stated:

" Creation of tropical centre and transition to open grasslands: the design of the Zoo is to work with its natural bushland setting by grouping exotic species at the centre of the site and merging to native grasslands at the outskirts"

Yet I could not find in this section, *Section 3.5.1* or *Appendix I* a list of the exotic species.

Elsewhere in the document *Section 6.10 Vegetation and Biodiversity* is referenced, yet in this section a significant amount of detail has been provided on the existing vegetation but not what will be introduced and how will this introduced flora be managed.

Without a list of species I am unsure how we can even discuss how this flora will be managed. Plants can and are distributed by water, air and by animal. As such, the questions I wish to ask are: How will the spread of these exotic plant species be managed? Will native birds be kept away from the African Grasslands? During storms and intense winds, how will the site mitigate the risk of exotic seed distribution by air?

Assuming there is no strategy, will the zoo actively monitor and manage the surrounding areas of western Sydney? The vacant land and riparian corridors? Or will this responsibility fall to the Western Sydney Parkland Trust or to the open space teams of Blacktown City Council and its neighbours? Or, alternately will nothing be done

It is well known that African Lovegrass is a weed species currently trying to be managed in Sydney.

What new plant species is the Sydney Zoo introducing to the area?

Australia is fortunate, as islands, to have a natural physical barrier for managing foreign flora & fauna entry. Yet there are already many examples of introduced species devastating local environs.

I believe this risk alone needs to be addressed before this proposal can be approved.

I would prefer to see this done by means of referring the proposal to the Planning Assessment Commission and a public hearing held where individuals can speak who are experts on both plants, mitigation strategies and their success, and finally, bushcare representatives who have the practical responsibility of cleaning up the problems of ill-planned developments.

2. Financial Consequence of Commercial Failure:

Although practically not a direct financial concern it is clear from other projects, particularly mines, that remediation of developed sites will not occur if the operating enterprise financially fails. This concern is very relevant in the mining industry in January, 2016 amongst the concerns with systemic low commodity prices. I believe this proposal needs to consider this risk and in fact currently consider the overall project medium-high risk for the following reasons.

2.1 Capital Costs:

Section 3 of the EIS states:

This SSD application does not seek approval for the specific details of each exhibit space as these vary depending on the species within each. Each exhibit space will be in compliance with the relevant requirements under the *Exhibited Animals Protection Act 1986* (EAP Act) and will be subject to individual inspection and certification post-construction in order for Sydney Zoo to receive a licence to operate as an exhibited animals facility. The SSD application does include the main structural elements of each exhibit including its size and shape and the bulk earthworks (such as moating and mounding). Refer to **Section 5.1.3** for further details about the EAP Act.

And Section 5.1.3 states:

The *Exhibited Animals Protection Act 1986* (EAP Act) identifies the need for approvals to be given for the Zoo to exhibit animals, with certain animals requiring specific permits. The EAP Act will ensure the safety and well-being of animals through the design and approval of animal enclosures, and covers a range of areas including:

- psychological and physical animal welfare;
- educational value of exhibits;
- public safety; and
- legal effect of licencing requirements on animal exhibitors.

During the detailed design of the proposed Zoo, Sydney Zoo will submit an application for Approval to Construct an Animal Display Establishment, and an application for a permit to exhibit any species within Schedule 2 of the Exhibited Animals Protection Regulation 2010. These species are those who require specialist care, pose a threat to keeper or public safety, present a danger to agriculture or the environment and subject to studbook or cooperative conservation programs conducted under the Australasian Species Management Program.

In principle the EIS states that detailed design will come later which I can understand as there is no point in doing this design before first level approval. But in talking with people with zoo management experience they suggest these numbers seem low for a zoo build. I would suggest that if the budget for the capital installation increases by more than 10%, then a review of the financial feasibility of the proponent and project needs to be completed.

2.2 Operating Costs:

I take note that in *Section 1.6 Secretary's Environmental Assessment Requirements - Table 2:*

The EIS must be accompanied by a report from a qualified quantity surveyor providing:
a detailed calculation of the capital investment value (CIV) (as defined in clause 3 of the Environmental Planning and Assessment Regulation 2000) of the proposal, including details of all assumptions and components from which the CIV calculation is derived;
a close estimate of the jobs that will be created by the development during the construction and operational phases of the development;
and
certification that the information provided is accurate at the date of preparation.

Proponents response:

The proposed Zoo has an approximate CIV of \$28 million. The CIV will be provided to the Department of Planning and Environment under separate cover.

I also note in *Appendix S*, that KPMG were privy to an opex for the proposal and provide an estimate for salaries. I have consulted two people I know who have been in management at zoos previously. Both believe the capital costs seem a bit low (mentioned previously) and the operating costs for staff are soft. Specialist staff are required to properly operate a conservation zoo and their salaries are not cheap. Again, I believe a review of the financial feasibility of the proponent and project needs to be completed. I am not sure who Jake Burgess is, other than a venture capitalist, and what supporting commercial infrastructure he has to run a zoo over many decades.

2.3 Effects on the Management of the western Sydney parklands:

Nowhere in the EIS is the risk or potential impact of financial failure of the enterprise discussed. This development will alter the immediate area of its development and on possible failure of the enterprise I believe there should be a requirement to make good the area. After all, it is part of the western Sydney parklands. As such, I would expect that an environmental bond or lien is prescribed as part of the approval of the development. Approval of this proposal should not be at the expense of other conservation plans for the green corridor of western Sydney.

In summary to the financial consequences, I believe the proposal has enough financial risk that it needs separate assessment by an independent body. I also believe that an environmental bond/lien of reasonable, significant value should be applied to the proposal to provide for the make good of the development. I propose a value of 10% of capital cost, \$2.8 million.

3. Focus and theme on African wildlife

From the EIS the entry building has the appearance of a traditional African structure and the restaurant would be called Boma - the word for an African enclosure.

In Section 3.4.6 - Table 4 there is a list of animal enclosure with the dingo being the only Australian native animal. In Section 3.12.5 both the emu and cassowary are mentioned as ratites for animal escape.

Given the proposed development will be in western Sydney, I believe a prescribed percentage of the zoo should be dedicated to Australian wildlife. I would recommend a percentage by species, say 40%.

I would also recommend that an Australian theme dominates the park's culture and vision. The Western Sydney Parkland Trust should have prescribed this as part of the lease contract. We should be proud of our unique flora, fauna and the aboriginal history of Australia.

In Section 9.1 the EIS states:

The Zoo proposes to participate in international breeding and conservation programs, with current discussions underway with the Australian Wildlife Conservancy to form an alliance to begin the preparation of a suitable conservation program

In this modern day, it is expected that a zoo has a large focus on breeding/conservation - to simply allow the proponent to "propose" is simply not acceptable - this must a requirement of approval. I would also recommend that 50% of the conservation program is dedicated to Australian native species fauna.

This third point is more of comment but goes to the culture and thinking of the zoo. If it truly wishes to be accepted and adopted by the local community it needs to be proud of its Australian location. It would then be a true icon of the region.

SUMMARY:

A primarily Australian zoo with context to the Cumberland Plains Woodlands is a development I would look to support. From the website and this proposal, this development is not.

From my points above I would suggest the zoo's economics needs to be independently reviewed. I also wish to ensure a risk assessment and mitigation strategy is in place in case of economic failure.

From a biophysical viewpoint, I believe the risk associated with the unspecified exotic plants the site will manage is significant and warrants a deeper public review. I disagree with the statement in Section 9.2:

The proposal is unlikely to affect threatened species, populations or ecological communities or their habitats, within the meaning of the *Threatened Species Conservation Act 1995* or *Fisheries Management Act 1994* and therefore a Species Impact Statement is not required.

I would recommend the precautionary principle be applied to this development.
I oppose this development based on this principle.

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