

Dr Mehreen Faruqi
Greens Member of the NSW Legislative Council



The Planner
NSW Planning and Environment

1 February 2016

Dear Madam/Sir

Re: Submission to the Environmental Impact Statement for the Proposed 'The Sydney Zoo' (SSD 7228)

Thank you for the opportunity to provide a submission to the Environmental Impact Statement for the proposed "The Sydney Zoo", currently on exhibition. I do this in my capacity as the Greens NSW Spokesperson for the Environment and for Animal Welfare.

The Greens NSW oppose this application on both environmental and animal welfare grounds. I understand there is limited scope for the Department of Planning and Environment to consider animal welfare issues in the Environmental Impact Statement. However, we consider this to be a significant oversight and hope they will be incorporated nonetheless.

Please consider the following issues in your determination

Western Sydney Parklands Trust

The proposed zoo is located within the Western Sydney Parklands, which was established by the Western Sydney Parklands Act 2006. This Act is primarily concerned with conserving the environment and establishing recreational opportunities that promote community and public access. This zoo will take a significant amount of parkland space, which will no longer be freely available to the general public. The Government has never identified what alternative uses of space were considered before the zoo was awarded the lease, including those that could have preserved public space and access.

The Greens are opposed to the principle that environmental and recreational trusts, such as the Western Sydney Parklands, should be self-funded by selling or leasing large amounts of land to private interests, as this inevitably leads to the loss of open public space in favour of private space that those with money can afford to access. This is exactly what is happening in this proposal. The Western Sydney Parklands Trust should be adequately funded by the Government to maintain and expand bushland as well as provide recreational opportunities, such as parks, where appropriate.

There are already a significant number of private developments with paid user access within the Western Sydney Parklands, such as Treetop Adventure Park, Wet'n'Wild, the Junior Motorcycle Training Facility and Calmsley Hill City Farm which already generate income for the Trust.

Environmental Issues

The ecological study conducted as part of the EIS has identified two significant plant communities, the River Flat Eucalypt Forest and the Shale Plains Woodland. The River Flat Eucalypt Forest is recorded as



an Endangered Ecological Community under the Threatened Species Conservation Act (TSCA) and Shale Plains Woodland, a sub-community of Cumberland Plains Woodland is not only an Endangered Ecological Community under TSCA but also a Critically Endangered Ecological Community under the EPBC Act. The first priority should be to protect and rehabilitate this land for ecological reasons.

The project proposes to follow the NSW Biodiversity Offsets Policy for Major Projects, which we consider a deeply flawed policy instrument that ultimately leads to net biodiversity loss. The policy weakens the requirements of proponents to find offset sites that match the ones that will be destroyed, the so-called 'like for like' principle, meaning developers can just find broadly similar areas or even pay into a fund as compensation for the loss or irreplaceable biodiversity. The use of offsets is especially inappropriate for dealing with some of the last remnants of endangered ecological communities. The native vegetation plantings proposed are welcome, but would be more effective as part of a larger rehabilitation project that maintains and expands the existing forest.

The presence of large amounts of exotic grassland and invasive weeds should be seen as an opportunity to rehabilitate the area, especially given the presence of endangered and critically endangered ecological communities.

Animal Welfare Considerations:

The simple reality is that a zoo that is established as a tourist destination cannot meet its objectives of conservation and animal welfare. There are many more effective ways of educating people about animals and habitat loss without condemning animals to a lifetime of captivity.

The Sydney Zoo draft 'Animal Welfare Policy' commits the zoo to providing habitats that meet or exceed legislative requirements. But the reality is that zoos are in most cases unable to provide the habitat and space required for animals to exhibit their natural behavior and the legislative requirements are not realistic. For example, the external African Elephant enclosure at the zoo is expected to be 348 m³ but, in the wild, these animals can travel as far as thirty miles a day which this zoo is incapable of providing.

The inclusion of a 'show arena' in the plans further shows that this facility is primarily designed to be an entertainment facility with animals, an idea that is outdated and detrimental to animal welfare. Animal shows can be deeply stressful for animals, especially if they are required to learn and perform routines that are not part of their natural behavior.

Aboriginal Heritage

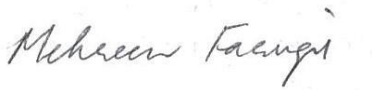
According to the Environmental Impact Statement there will be significant adverse impacts of this development on the identified Aboriginal heritage, primarily through the construction of the car park. In most cases there will be a total loss of aboriginal heritage value. This is incongruent with the Zoo's stated claims of wanting to promote "strong educational programs around the areas of conservation, local natural history and local Aboriginal and European heritage".

In summary, the Greens oppose this development. We believe that the NSW Government should consider an alternative project that is more in keeping with the objectives of the Western Sydney

Parklands, including conservation of the environment and community access to recreational opportunities such as walking and parks.

Thank you for the opportunity to provide this submission. Please do not hesitate to contact me or my office for further information.

Kind Regards

A handwritten signature in black ink that reads "Mehreen Faruqi". The signature is written in a cursive style with a small flourish at the end.

Dr Mehreen Faruqi MLC
Greens NSW Environment and Animal Welfare Spokesperson