

**Submission
No 43**

REVIEW OF THE GREATER SYDNEY PARKLANDS TRUST ACT 2022

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Submission to Joint Select Committee on the Greater Sydney Parklands Trust

19 February 2025

To the Joint Select Committee:

Thank you for the opportunity to provide a submission on whether the policy objectives of the *Greater Sydney Parklands Trust Act 2022* (the Act) remain valid, and whether the terms of the Act remain appropriate for securing those objectives.

To place this submission in context, I note that the objects of the Act are numerous, and include, in summary (paraphrasing section 3):

- Managing the parklands as a public resource;
- Facilitating a connection to Country for First Nations peoples;
- Environmental conservation objectives;
- Advocating a long-term vision for parklands in Greater Sydney; and
- Supporting community use of parklands.

While these diverse objectives are laudable, they may in practice come into conflict with one another, particularly when one considers the interests of people versus the protection of wildlife in the natural environment.

The purpose of this submission is to outline the importance of preserving Greater Sydney Parklands Trust (GSPT) lands not only as a resource for our human community, but as a habitat for the wildlife that depends on them. As land development threatens the preservation of habitats of vital importance to our wildlife, it has become even more important to ensure that our parkland assets remain safe environments for the animal world.

Stewardship of the natural world and its inhabitants

As continuing development and other human activities destroy or disrupt natural habitats, our responsibility for preserving the environment for the use of wildlife takes on increasing importance.

Below I provide a few examples, noting relevance to the management and use of GSPT lands.

- The destruction of wetlands in Australia has contributed to a sharp decline in the numbers of migratory shorebirds worldwide, many of which fly to and from the

Northern hemisphere every year, from as far away as Alaska.¹ This trend is of direct relevance to Centennial Parklands, which has been host to Sharp-tailed Sandpipers from Siberia in recent years. This is just one example of the importance of keeping GSPT lands, including its waterways, free from rubbish.

- The feeding of wild birds, while enjoyable to humans, often does more harm than good (particularly when the birds are fed bread and similar foods).² Despite some signage and website content, the feeding of bread to wild birds happens daily in Centennial Parklands.
- Noise pollution has been shown to have negative impacts on animals, including causing animal populations to relocate or directly causing them harm.³ Noise pollution can also cause less easily visible harm, including harming and even killing invertebrates that form a vital food source for other wildlife (such as birds), or control the population of organisms that unchecked can have a negative impact on the environment.⁴ The concerts that occur in Centennial Parklands can be heard clearly from outside the park; it is not clear what kind of harm is occurring to the wildlife located in close proximity.

Recommendations

The Act as currently drafted prioritises human use of GSPT lands and takes a limited view on protection of the environment. The following recommendations consider how the current regulatory settings could be improved to better balance human and wildlife needs.

1. *Update the policy objectives to ensure that the function of the Trust explicitly includes protection of wildlife and habitats.* Update section 15 to include preserving and protecting wildlife and habitats. Despite the broad focus of the Act as set out in section 3, the only mention of protection of the parklands as an environmental concern with reference to the land itself, rather than the wildlife and habitats on it: “conserve, restore, enhance and ensure no reduction in the

¹ birdlife Australia, “Migratory Shorebirds”, <https://birdlife.org.au/programs/migratory-shorebirds/?srsltid=AfmBOopOaouhXNUQoMjFHQXRcz1ihrYX8asjgbTahGvGitVM5Q-C3A6E>.

² Centennial Parklands, “Protect our wildlife by keeping them wild” (17 Feb. 2023), <https://www.centennialparklands.com.au/stories/2023/mother-day>; birdlife Australia, “A guide to feeding wild birds in Australia”, <https://birdlife.org.au/a-guide-to-feeding-wild-birds-in-australia/?srsltid=AfmBOortRJc9BzPyNqP5EG8HnaZAL1qMv1oSaQmm9zzELHexxXX8szB>.

³ K Parris and R McCauley, “Noise Pollution and the Environment”, <https://www.science.org.au/curious/earth-environment/noise-pollution-and-environment#:~:text=By%20discouraging%20species%20sensitive%20to,occurred%20naturally%20in%20the%20wild.;>

⁴ B Barton, “Rock ‘n’ roll is noise pollution – with ecological implications that can spread through a food web” (2018), <https://theconversation.com/rock-n-roll-is-noise-pollution-with-ecological-implications-that-can-spread-through-a-food-web-98998>.

extent of the net existing natural environment of the parklands estate” (s 15(1)(a)).

2. *Director expertise and priorities.* Require that at least one Director prioritises the preservation of wildlife and habitats. Instead of relying on the general requirement that the Board as a whole has experience in a number of areas, including “environmental and conservation management” (s 9(1)(b)), require that the Parklands board includes at least one Director with a *primary* background in ecology, environmental science, or similar, with a documented role to advocate for the preservation of natural heritage and wildlife over purely human needs. The current Board does not seem to include a Director with such priorities.
3. *Permanent advisory committee.* Require the establishment of a permanent advisory committee focused on the preservation and stewardship of wildlife and its habitats in GSPT lands, who will report to the Board on a regular basis, eg, quarterly.
4. *Allocate resourcing focused on wildlife and habitats.* Require the hiring of permanent staff responsible for the stewardship of wildlife as their key responsibility.
5. *Reporting.* Add a requirement to the Act to document and report on species health within the GSPT lands on an annual basis, working with local wildlife organisations to do so as necessary.
6. *Introduce a test for evaluating activities using GSPT lands.* Modify section 21 to ensure that the GSPT balances community and wildlife needs, including when considering applications for musical and other events, with the aim of reducing (or eliminating) events that cause harm to wildlife. Consider issues such as whether there are nesting birds and other animals nearby, and whether sound levels will destroy invertebrates, who are a key source of food for larger animals such as reptiles and birds.
7. *Ensure contracted parties preserve wildlife and habitats.* Modify section 20 to ensure that contracted parties hired to manage GSPT lands do so consistently with the modified purpose of the GSPT noted above, including preservation of habitats and species.

Conclusion

As the wildlife and habitats in our care cannot speak for themselves, it is important that we ensure their interests are given appropriate consideration. In the longer term, the health of wildlife and habitats are in everyone’s interests, as they are also relevant to human health and wellbeing. However, in the context of shorter-term considerations on how to make use of our parklands, it is currently too easy under the Act to ignore the needs of the animal world.