Ku-ring-gai Bat Conservation Society Inc.

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Mr Thomas Parry
Independent Pricing and Regulatory Tribunal
PO Box Q290
QVB Post Office
NSW 1230

Submission on Undergrounding Electricity Cables in NSW

Dear Mr Parry

The Ku-ring-gai Bat Conservation Society (KBCS) requests that impacts on the environment, particularly, on biological diversity be included in the review of costs and benefits of undergrounding electricity cables in NSW. Our organisation is concerned that overhead electricity supply contributes to the decline in the grey-headed flying-fox population which has a flow on effect to the ecosystems which support us.

Issue: Electrocution of flying-foxes
Electricity supply companies remove dead flying-foxes from the cables because they obstruct electricity supply. This is an additional cost.

Each year the majority of infant flying-foxes rehabilitated by wildlife care groups in urban areas were orphaned by the electrocution of their mothers. When a live infant flying-fox is reported on the electricity cables then the supply company is obliged to send staff to remove it safely before it dies of starvation after the death of the mother. Flying-foxes are mammals and the single young born in spring each year is totally dependent on its mother's milk until able to forage for itself.

Issue: Costs to the biological-diversity of NSW and Australia.
The grey-headed flying-fox *Pteropus poliocephalus* was listed as a vulnerable species under the NSW Threatened Species Conservation Act and nationally under the Environment Protection and Biological-diversity Conservation Act in 2001. The independent scientific committees recommended that the species be listed because a decline in its abundance of 30% has been observed in the last 10 years and unless threats to the species are reduced a further decline is predicted.

Grey-headed flying-foxes are particularly mobile. They move in response to changes in food availability. Their diet is primarily nectar and pollen from the flowers of eucalypts and related genera, melaleuca, banksia and in summer and autumn they feed on a range of rainforest fruits.

Flying-foxes are recognised as important pollinators. Their mobility enables them to move between groves of flowering trees, carrying the pollen on their fur. The trees benefit from this movement of pollen between them to produce viable seed. The animals are essential for gene transfer.

Similarly, when flying-foxes feed on rainforest fruits, the trees benefit because the animals carry seeds away from the parent tree and in the case of seeds less than 4 mm in diameter can be carried many kilometres in the gut of a flying-fox. Seed disperal is an important ecosystem function. Flying-foxes move easily across landscapes where the native vegetation is now fragmented as a result of clearing for agriculture and urban development.

The population of the grey-headed flying-fox moves between Queensland, New South Wales and Victoria (refer to MPWS threatened species profile). The species occupies areas with the highest human habitation in Australia and therefore where electrocution of flying-foxes on electricity cables occurs throughout the urban areas.

Data on flying-fox electrocutions

Although electrocution on electricity cables is not listed as a threat in the NSW and National threatened species listing it was listed in the 1999 Bat Action Plan published by Environment Australia. The reason it was not referred to in the listings of vulnerable species is because there is no comprehensive collection of data on electrocutions. Individual wildlife care groups have lists of electrocutions in their area which they compile annually.

Recommendation 1

KBCS requests that IPART refer to the impact of overhead electricity supply as an impact on a threatened species and on the ecological functions (pollination and seed dispersal) which it performs. Then indicate that the issue is data deficient and recommend that electricity supply companies and wildlife care organisations collect records of electrocutions of flying-foxes in a way such that it is comparable throughout the state in preparation for further assessment of the impacts.

Issue: Pruning of Trees Around Electricity Cables

The increasingly aggressive pruning of trees around overhead electricity and communications cables is causing serious damage to trees, especially native species that are remnants of the original forests and which act as biological linkages between National Parks and other bushland through urban areas.

Recommendation 2

KBCS recommends that the financial costs of the pruning be included in the assessment of the costs.

Recommendation 3

KBCS recommends that the long term environmental impacts on trees, especially native species which provide bio-linkages between remnant bushland in urban areas and consequently on wildlife be acknowledged as a cost to the community.

In conclusion, KBCS also supports a full assessment of the health effects of placing electricity supply underground, implications for other wildlife such as possums which use cables to cross roads safely, electrocution of other wildlife eg. powerful owl. We look forward to a comprehensive and publicly available assessment of the costs and benefits.

Yours sincerely,

Nancy Pallin

Nancy Pallin
Chairperson
4th February 2002