



NATIONAL PARKS ASSOCIATION OF THE ACT INC.

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### **Commentary on the Woodlands Strategy**

Thank you for the opportunity to make a submission on the *Draft ACT Native Woodland Conservation Strategy* (the Strategy). The National Parks Association of the ACT (NPA ACT) is a community-based conservation organisation with nearly 60 years of working to protect our natural environment through an active outings and work party program; participation in Parkcare activities; an extensive publication program; public meetings and conferences; engagement with government policies and programs and the support of scientific research.

The NPA ACT recognises the importance of the sub-alpine woodland ecosystems to the diversity of Namadgi National Park and the national importance of the ACT's lowland woodlands. It has sought the protection of the ACT's woodlands through constant championing of the ACT woodlands' values.

The NPA ACT recognises the effort that has gone into the development of the Strategy and congratulates all involved for their contributions to a strong document. The NPA ACT supports almost all of the conservation objectives of the Strategy.

The key points of the NPA ACT's submission are the recognition that a large proportion of the ACT's lowland woodlands are not in conservation. This means that a key focus should be on the engagement of rural lessees for the protection and enhancement of rural based woodlands. It also means that strong consideration should be given to increasing the area of woodlands in conservation reserves and to the consolidated management of woodlands as opposed to management through multi- ecosystem based management plans.

Key threats to the ACT's woodlands are urbanisation, climate change and bushfire management practices and these are addressed as part of the more detailed commentary that follows as Attachment A.

Should you require any further information please do not hesitate to contact the NPA ACT office, to the attention of Mr Rod Griffiths, convener, NPA ACT Environment Sub-committee or by mobile on 0410 875 731.

Yours sincerely

Handwritten signature of Esther Gallant in black ink.

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President  
National Parks Association of the ACT

Handwritten signature of Rod Griffiths in black ink.

Rod Griffiths  
Convener, Environment Sub-committee  
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# NPA ACT Submission on the Draft Native Woodlands Conservation Strategy

## ATTACHMENT A - General Commentary

ACT wide government policy should be developed that ensures that outer asset protection zones for all new developments are located outside the boundaries of a reserve and that, in determining that buffer, consideration of the likelihood of long-term regeneration be reflected in where the buffer is measured from. This would be of considerable importance to woodland reserves like Kama where buffers are being sought to be measured from the boundary of existing woodlands and not where they will eventually regenerate to.

Page 6 The NPA ACT supports the 4 goals in the Objectives on this page.

Page 8 Should any of the species for which conservation advice is to be developed be moved to threatened status? Are there other species, other than birds, that require specific advice to be drawn up? What about the status of invertebrates? (Noting the potential decline in insect species reported internationally). Is it appropriate that some threatened species do not have action plans as it is believed that all required actions will be covered by the implementation of the Strategy?

How much of the threatened species action plans get repeated in the Yellow Box Red Gum Grassy Woodlands (YBRGGW) action plan? What is the most efficient way of managing this (probably having the community plan refer to the species as these cross a wider range of ecological habitats.)

Hopefully the Woodland Conservation Implementation Plan will ensure that management plans and actions are adequately resourced so that their implementation and redevelopment occurs in a timely manner.

Page 15 Table 1 emphasises the importance of liaison with, and positive action by, rural lessees given the high percentage of rural holdings of most of the lowland ecosystems and this is strongly supported given the extent of lowland woodlands contained on rural properties.

### 1.1 *Retain and protect native woodlands*

Page 17 - The NPA ACT makes the following comments on the conservation objectives for this sub-theme:

- *Ensure no net loss of the ecological and cultural values of woodlands in the ACT.* NPA ACT – Supported but to do so requires a change in current environmental and planning practices. A key threat to the values of woodlands is the impact of the urban environment whether from the existing suburbs or from its continued expansion. The need for urban development that has the environment as a primary consideration will be vital to ensure no net loss of existing woodland values. Situations such the development of the suburb of Whitlam where the proposed buffer between the new suburb and the Kama woodland fails to consider the potential for woodland regrowth are obvious examples where planning has not taken into account the best environmental interests for these woodlands.
- *Maintain or improve the proportion of each woodland community located within the ACT's formal reserve system* (see Table 1, Table 2). NPA ACT – Supported. However, while it is extremely important to increase extent of woodland representation in reserves, the optimal outcome is one that ensures that there is a consolidated approach to the management of these woodland reserves and that awareness of the importance of the woodlands is raised within the ACT and national community. Currently, the ACT's lowland woodland reserves are separate units within Canberra Nature Park and are covered by a management plan that covers a range of ecosystems. There is a lack of focused attention on woodlands which a consolidated management approach would rectify if adopted. The Woodlands strategy should be the plan of management for all woodland reserves under a consolidated scheme of woodland reserves.

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- *Identify opportunities to improve representation of lowland Snow Gum woodland (u78) and Red Box tall grass-shrub woodland (q6) in the ACT's formal reserve system.* NPA ACT - Supported
- All species of woodland flora and fauna should be represented by viable, wild populations that will enable the species to be conserved for perpetuity. The ACT Government will continue to support regional and national effort towards the conservation of these species. NPA ACT – Supported. The viability of the ACT's woodlands is enhanced where well protected ecosystems exist in surrounding NSW. The ACT should work with surrounding councils to ensure that development that is not conducive to the health of woodlands is avoided and that key woodland ecosystems are protected.
- *Improve understanding of the distribution of Endangered YBRGGW community in the ACT and aim to protect all remaining areas from unintended impacts (see action plan, Part B).* NPA ACT – Supported. It is vital that all woodland ecosystems in the ACT be identified and plans established to ensure that future developments do not reduce these ecosystems' viability. An identification of all potential greenfield development sites should be completed and environmental values established well before development planning is commenced. The maintenance and enhancement of these environmental values should be the key input into the initial planning for the greenfield developments.
- *Prioritise the protection and ongoing management of woodland that contributes to threatened species conservation (as outlined in respective action plans and conservation advice, Part B).* NPA ACT – Supported.
- *Identify opportunities to protect and enhance the values of woodlands outside the reserve system, guided by relevant policy and legislation and in collaboration with non-government agencies and community members (see Section 2.1).* NPA ACT – Supported. This is vital given the extent of woodlands not in the ACT's reserve system. As well as clear environmental objectives in land management agreements, the ACT should consider the potential for environmental stewardship programs like "Land for Wildlife" that engage leaseholder voluntary participation in the protection of woodlands. The ACT should also consider economic mechanisms to support work completed via the land management agreements or through voluntary agreements in recognition of the Territory and National significance of the woodlands managed by leaseholders.
- *Manage the impact of residential and commercial development on woodlands in the ACT through the Environmental Offsets Policy and those strategies outlined in Section 1.2.* NPA ACT – Supported, noting prior above commentary on developments.

**1.2 Reduce threats to native woodland biodiversity** - The NPA ACT makes the following comments on the conservation objectives for this sub-theme:

Page 20 *Dieback* – NPA ACT – the conservation objectives are supported and the NPA ACT would like to see further investigation into the impacts of low intensity conservation burns.

Page 22 *Control pest animals* - NPA ACT - the conservation objectives are supported with the following comments. Need for long term funding of pest animal management programs is strongly supported. Pest animal control programs are required to be run over long periods and intermittent funding for these programs undermines their effectiveness.

There is a need for the ACT to have a rapid response potential for new pest animals as it is easier to control new arrivals as opposed to when a population gets established.

The NPA ACT believes that the commentary on feral horses should note that lack of effective control in NSW creates the risk of significant feral horse incursions into the ACT.

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Page 25 *Fire management* – NPA ACT - the conservation objectives are supported with the following comments. The NPA ACT supports the use of conservation and indigenous burns as both are predicated on low intensity, mosaic producing fire effects, which is the preferred fire management outcome.

The NPA ACT also strongly concurs with the preservation of long unburnt areas as research has shown the natural low fire propensities in these areas. However, it should also be seeking to develop long unburnt patches in the landscape.

Page 27 *Urbanisation* – NPA ACT - the conservation objectives are supported noting the NPA ACT's previous comments on urbanisation and development and the following additional comments.

The Strategy states that the woodlands in Gungahlin and Molonglo have been subject to rigorous ACT and Commonwealth statutory environmental assessment processes and approvals. While this is true, the ACT has not been able to fully comply with the environmental conditions imposed by the Commonwealth for both these areas. The NPA ACT recommends that sufficient resources be allocated to ensure that all Commonwealth environmental conditions for these areas are complied with.

As noted previously, the NPA ACT strongly supports the completion of environmental studies for development areas prior to urban planning to ensure that the environmental values of the areas being considered for development are protected. In particular, this approach should reduce the need for offsets as the ecological values in the development area are not compromised. Wherever possible, the need for offsets should be avoided and used as a last resort as the use of offsets has meant the loss of habitat.

When determining buffer zones to protect woodlands from urban development, it is important consider the extent of potential regrowth in the reserve. Without considering this the buffer zone may be inadequate to protect the full future extent of the woodlands.

Page 30 *Overgrazing* – NPA ACT- the conservation objectives are supported.

Page 31 Table 4 – This table lists Chilean Needlegrass as an emerging species but on page 32 it is described as being so abundant and widespread that eradication is not feasible.

Page 33 *Mitigate the impact of invasive plants* – NPA ACT - the conservation objectives are supported, noting the previous comments on funding in “controlling pest animals” are equally relevant for invasive plants.

Page 36 *Mitigate the impact of climate change* - NPA ACT- the conservation objectives are supported.

**1.3 Enhance resilience, ecosystem function and habitat connectivity**- The NPA ACT makes the following comments on the conservation objectives for this sub-theme:

Page 38 *Maintain and improve habitat features and habitat heterogeneity* – NPA ACT - the conservation objectives are supported with the following comment. Consideration should be given to increasing our knowledge of the role of invertebrates and their protection within a woodland setting.

Page 41 *Manage biomass* - NPA ACT - the conservation objectives are supported with the following comment. The NPA ACT strongly supports the addition of objectives relating to livestock grazing.

Page 43 *Enhance habitat connectivity* - NPA ACT - the conservation objectives are supported with the following comments. Connectivity is vital for the long term viability and the maintenance and

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expansion of connectivity of natural areas will enhance the ACT's woodlands. The enhancement of woodland connectivity would be expected to also improve the health of other ecosystems.

### 2. COLLABORATE WITH THE COMMUNITY

Page 45 *Collaborate with rural landholders* - NPA ACT - the conservation objectives are supported with the following comments. This is another significant area for ensuring the viability of the ACT's woodlands. A large proportion of the ACT's lowland woodlands are outside of reserves and much of this is on rural lease-holdings. Without the support of rural lessees, the Strategy will struggle to reach its objectives. Positive engagement with the rural community is vital and support for the conservation activities undertaken by rural lessees imperative to ensure support for the objectives of this Strategy. As mentioned previously, a covenant system, like Land for Wildlife, should be introduced to further engage with lessees.

Page 45 *Support community participation and raise community awareness* – It is disappointing the NPA ACT is not separately recognised on this page for its ongoing championing of the values of the ACT's woodlands. Amongst its ongoing work on behalf of woodlands it was a key group in the lobbying for the creation of Mulligan's Flat, it conducts sub-alpine restoration projects in Namadgi woodland restoration in NSW and its campaign for a national park based on lowland grassy woodlands was the driver for the creation of the Woodlands Community Reference Group.

Page 46 *Support community participation and raise community awareness* - NPA ACT - the conservation objectives are supported with the following comment. The NPA ACT also supports the broadening of mechanisms used by Parks and Conservation. Parkcare groups continue to remain very important but widening the opportunities for the community members to participate is also crucial.

Page 49 *Enhance and promote citizen science* – Supported.

Page 50 *Enhance participation of Aboriginal people* - - NPA ACT - the conservation objectives are supported with the following comments. This is an area where continued growth is both desirable and important for the environment. Recognition of the cultural heritage of the traditional custodians is an important component of the management of the ACT's natural environment. Continued research in indigenous land management and expansion of indigenous involvement in land management are important objectives for the Strategy.

### 2.2. Support sustainable recreational use of woodland

Page 51 *Support sustainable recreational use of woodlands* – NPA ACT – A key strategy missed in this section is the development of a recreational strategy for the ACT which would identify non-reserve sites for recreational activities that would take some of the pressure off reserves.

In respect to relying on individual management plans it is important to note that these are not reviewed as regularly as would be desirable. And therefore they may not reflect current optimal management principles.

### 3. MONITORING AND RESEARCH

Page 53 *Monitor woodland condition* and Page 57 *Deliver research outcomes* – NPA ACT – There is support for the conservation objectives noted in these two sections. Fast tracking of the development of CEMP is important and science should continue to be the basis for land management practices.