



National Parks Association of the ACT Inc.

conservation education protection

ACT NRM Plan
C/- Environment Division
Environment, Planning and Sustainable Development Directorate
Via epsddcomms@act.gov.au

Submission on the (Draft) Natural Resource Management Plan Discussion Paper 2021

Thank you for the opportunity to comment on the (Draft) Natural Resource Management (NRM) Plan Discussion Paper 2021 (the Discussion Paper).

The National Parks Association of the ACT (NPA ACT) is a community-based conservation organisation with more than 60 years of experience in helping 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.

Overall Comments

In the main, the Discussion Paper addresses most of the key points for consideration in the development of the next NRM Plan. However, it would be strengthened if included commentary on:

the ACT's place within the Capital Region. Developments and events occurring in neighbouring parts of New South Wales (NSW) have the potential to significantly influence the ACT's environment. While the NRM Plan will focus on actions and investment within the ACT, it should, as a minimum, consider cross-border impacts and investigate mechanisms to reduce adverse environmental effects arising from outside of ACT. It is important that NSW plans and strategies be taken into account.

- the importance of the urban environment in contributing to natural resource outcomes. In particular, the Discussion Paper does not reflect on the importance of the urban forest and urban reserves to be areas of connectivity and habitat for the indigenous flora and fauna.
- the impact on NRM by areas such as air and water pollution, waste, tourism and population growth.

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- the need for NRM issues to be considered across all of the ACT's government agencies. A healthy environment requires a whole of government approach to be adopted.
- the potential for an environmental stewardship scheme to be introduced which would complement the existing Land Management Agreements.
- the need for additional funding as the ACT's reserve system grows.

The NPA ACT notes that the vision statement in the Discussion Paper is very broad and cannot be quantified. It would be better to include a vision statement that is more specific such as "The ACT will manage natural resources to be resilient to climate change, to protect threatened species, and to provide environmental services for the ACT community."

Responses to Specific Sections and Discussion Paper Questions

P.5 - What is natural resource management (NRM)

The NRM Plan is a key document for identifying the key environmental strategic outcomes and the actions and resources needed to achieve these outcomes. As identified in this section it draws numerous existing ACT legislation, strategies and plans. The NPA ACT has commented on most of these documents and notes that there are numerous high priority actions identified within them. A key role for the NRM Plan should be the further prioritization of these actions and the identification of adequate resourcing.

The section could also be strengthened by commentary on specific NRM issues in the ACT such as air and water quality, tourism impacts and population pressures, etc. In addition, the Discussion Paper should place the ACT in its regional context and identify the potential for regional events (such as fires in 2003 and 2020) to influence NRM in the ACT.

P.6 - NRM Planning in the ACT over the last 15 years

The ACT has a wide range of strategies and plans covering the protection of the environment and the NRM Plan should play a key role in prioritizing the many and diverse actions in these documents as well as identifying the resources needed to achieve these actions. However, to do so the NRM Plan will also need to recognise that natural resource management is influenced in decisions made in accordance with that are not primarily focused on the natural environment. For example, legislation, strategies and plans dealing with matters such as planning, pollution, tourism, population growth and waste all have the potential impact on the natural environment. The future NRM Plan needs to consider how decisions in these and other areas will impact both the natural environment and the proposed actions arising from the NRM Plan.

The NPA ACT notes that this section lists many achievements in relation to NRM management over the past fifteen years and recognises the importance of these. It would be useful however for the Discussion Paper to also include the lessons learnt from the prior NRM Plans, e.g. what have we learnt from things not going right?

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In the listing of documents under Ngunnawal Natural Resource Management, are there other Aboriginal engagement plans and strategies that could be referred to?

P. 8 - Guiding principles

Question: Do you agree with these Principles? What other principles should guide the development of the Plan?

The principles espoused are all appropriate but would be strengthened if the matters listed in our overall comments above are incorporated.

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P.11 Our natural environment

The Discussion Paper refers to approximately 70% of the ACT is in conservation reserves. The NPA ACT would query this figure and believes that such a percentage is only possible by including special purpose reserves and forestry areas in the total. Neither of these two land tenures have conservation as its primary focus.

P.13 - Key focus areas for a new plan

Question; Are there other major focus areas in NRM planning we should consider?

The NPA ACT believes the following items should be considered:

- mechanisms for avoiding and mitigating climate change impacts on the ACT's natural environment.
- protection of waterways and water quality of rivers and lakes.
- the need for the identification of all key areas of environmental importance not currently in a conservation reserve and the exclusion of these areas (including buffer zones) from future urban developments.
- the recognition of the importance of the urban forest and parklands to connectivity and NRM in general. In particular, consideration should be given to the protection of biodiversity of older Inner South and Inner North areas with increasing development and population pressures in these areas.
- impacts of increasing population on overall biodiversity.
- the impact of bushfire hazard reduction measures on the ACT's environment and how best to manage the protection of life and property without compromising environmental values.
- the potential for an environmental stewardship program that rewards land holders for actively setting aside and managing land for environmental purposes.

P.13 Biodiversity Conservation

Question: What are the species, communities, areas or issues that should be a major focus in NRM planning?

The NPA ACT has been a long-term champion of the important ecological values of the ACT's grassy woodlands. Its work in this area has helped highlight the extent to which the ACT's grassy woodlands are not included in conservation reserves. The NPA ACT therefore recommends that further initiatives be undertaken to place grassy woodland ecosystems into conservation reserves or have them incorporated into active off-reserve conservation areas.

Similarly, the NPA ACT would strongly support an on-going focus on the ACT's remaining grassland communities.

The 2020 fires had a significant impact on the ACT peat bogs and fens and therefore these will also require a significant level of management to maintain their long-term viability.

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Research must be conducted to identify the species that are most likely to be impacted by the effects of Climate change over the next 20 years and mechanisms developed to address these impacts.

Another often overlooked area of research and conservation is in relation to the ACT's invertebrate species. Globally research has shown significant declines in invertebrate populations and this has a direct impact on native species as well as agricultural production.

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P. 14 Climate Change

Question: How can NRM planning best address the issues associated with a changing climate?

Climate change affects all aspects of NRM. Therefore, climate change must be considered a key focus throughout all aspects of the NRM Plan. The NRM Plan is a mechanism that can help protect and manage our biodiversity in the future and provide a safe and healthy environment for our community.

P.16 Community involvement

Questions: What do you think needs to be included in the NRM Plan for the ACT? What challenges do you see for natural resource management in the ACT over the next decade?

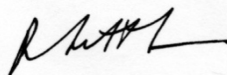
As previously raised, over a relatively short period, the ACT has seen the impact of fires and hailstorms on our community and biodiversity. As a result of this, the NRM Plan should have climate change as a key focus and how this will be managed for the next 20 years across the ACT.

Should you require any further information on our comments or our organisation, please do not hesitate to contact the NPA ACT office, attention of Mr Rod Griffiths, convener, NPA ACT Environment Sub-committee.

Yours sincerely



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28 May 2021