



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 Caring for Dhawura Ngunnawal: A Natural Resource Plan for the ACT 2022 – 2042

The National Parks Association of the ACT (NPA ACT) welcomes the opportunity to comment on the Caring for Dhawura Ngunnawal: A Natural Resource Plan for the ACT 2022–2042 (the NR Plan).

The 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

The NR Plan provides a good summary of the multiple threats facing the ACT's natural environment as well as the strategies already in place for the protection of the natural environment in the ACT

The NPA ACT is pleased to see that the NR Plan has incorporated many of the suggestions made by the NPA ACT and others as part of the 2021 public consultation on the National Resource Management Discussion Paper. In particular, the NR Plan:

- recognises the significance of climate change
- considers the importance of the urban forest and urban reserves to be areas of connectivity and habitat for the indigenous flora and fauna
- flags the potential for an environmental stewardship scheme
- highlights the need to collaborate with the New South Wales government

The inclusion of the above has strengthened the NR Plan.

However, the NPA ACT believes the NR Plan could be further strengthened. For example, the NR Plan states the 'Plan provides a road map of the key actions identified by extensive

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consultation¹ yet there is little to indicate how the targets recognised in the NR Plan will be prioritised, resourced and monitored. The NR Plan recognises that the ‘timing to implement each action will be dependent upon agreed priorities, the complexity of the action and availability of resources and will be determined by collaborative agreement between government and community²’ yet there is no discussion on how this will be achieved. In fact, this statement could even be taken to indicate that the actions in the NR Plan are solely those of the community and may not be implemented.³

For each of the key landscapes there is a table of Targets and Actions. Many of these targets and actions are aspirational and somewhat vague, and do not provide explicit targets from which progress can be measured. Many targets and actions begin with the words ‘Increase’, but over the life of the plan it is not clear whether an increase of 1% or 50% is expected as a significant achievement.

The purpose⁴ outlines that the Australian Government requires each funded NRM region to create and maintain an effective NRM plan. This would indicate that a major reason for the creation of the NR Plan is to justify funding by the Australian Government for NRM actions. Yet due to the previously noted points it would be hard for the ACT to demonstrate that the NR Plan will be effective.

It is also unfortunate that as an overarching plan the NR Plan is not afforded statutory status. Such status would help compel compliance across the many ACT Government directorates whose decisions affect the ACT’s natural environment.

Detailed commentary

Page 8 - The Regional Overview⁵ is very extensive and is a useful summary of threats to the natural environment values, including population increase and urban expansion, with a thorough assessment of the threats arising from climate change. However, there is no further discussion of the issue of population increase in the remainder of the document, despite it being the major threat.

Page 11 – The section on fire should also reflect that the frequency of fire events has a significant impact on the flora species mix. An increase in fire events can encourage a preponderance of fire-tolerant species which can also lead to an increase in fuel load.

Page 12 - The NPA ACT appreciates the greater recognition of the cross-border relationships. However, while there is an ACT NSW committee, what actions is the ACT taking to directly engage with neighbouring councils whose decisions also can have a significant impact on environmental outcomes?

¹ Page 6

² *ibid*

³ The actions in all but one of the key focus areas are listed as ‘Actions identified during stakeholder consultation’

⁴ Page 6

⁵ Page 8 et al

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Page 15 - The section 'Where have we come from' is an interesting background to NRM in the ACT over the last 15 years. The last NRM plan (The Bush Capital Legacy, 2009) listed 16 broad targets, but concedes that there has been good progress in only 7 of these targets, with another 5 having some progress. This history of achievements does not encourage optimism in the value, nor the expectations, of the current plan and further emphasizes the need for the NR Plan to clearly identify priorities and resources for its targets and actions.

Need to work with the Commonwealth and the impacts of their decisions

Page 19 - The NPA ACT welcomes the strong Indigenous focus in the Cultural Landscapes section of the key focus areas.

Page 23 - In the Community connection with nature key focus area, the NPA ACT welcomes the ongoing need for community connection, but also argues that the goal 'Community connection' should not be interpreted as being carte blanche for turning our conservation areas into tourism hubs. Recreation in reserves needs to be consistent with the primary aim of conservation. Any development in the ACT's reserves should only occur where the conservation values of the reserves can be clearly shown to be enhanced and not degraded by the development.

While it is addressed later in the NR Plan, the Community connection with nature key focus area should also address how to involve the community in expanding connectivity and the urban forest in the environment throughout the suburbs, in line with the 'Rewilding of Canberra' vision.

Page 30 - Under the Rural Landscape key focus area, the use of Land Management Agreements (LMAs) as incentives as opposed to restrictions on actions should be considered. The incorporation of incentives for the incorporation and adherence to of conservation actions in LMAs should be encouraged as an alternative method of engagement between rural lessees and the ACT Government.

Page 31 - The NPA ACT supports the actions identified for use of rural leases in the fight against climate change.

Page 35 – Under the Urban Landscapes key focus area, the NR Plan states that a 'network of offset reserves has been set aside to compensate for some of the impacts of urban development'. However, this ignores the fact these areas should have been in reserves anyway, and that their existence as offsets means that we have lost in perpetuity other areas of conservation value. There is an urgent need to identify the high and medium conservation areas, and ensure they are protected from development and are supported by a network of connectivity and to avoid completely the use of offsets.

Page 37 – On this page the NR Plan makes the following statement that over 'the course of the consultation process for the development of this Plan there was a consistent theme from both government and community stakeholders that a range of government policies, plans and

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requirements could be contradictory to each other due to varying priorities or focus. Management of the natural and urban environment needs to be better integrated to support ecosystem function and human wellbeing outcomes.’ The NPA ACT fully supports these concepts.

Page 47 - Water quality will be threatened by the continued urban footprint and while the aspirations for Water Sensitive Urban Design is commendable, it also important to consider the ecological impacts on the hydrology from greenfield developments.

In addition, NR Plan looks to establish ‘a strategic plan for restoration of riparian ecosystems (landscape scale approach)’. The need for this is an example of a failure in the legislative basis for the ACT’s action plans and strategies. Under the current legislative framework, action plans and strategies often are only applicable to certain areas in the Act such as non-urban areas or only to public land. The ACT already has an Aquatic and Riparian Conservation Strategy, but it is only applicable to non-urban areas. Wherever possible, ACT landscape wide action plans and strategies should be in place.

Page 51 - Unfortunately, all the data and mapping in the Woodlands and Forests key focus area appears to concern woodlands, and despite the title, there is almost no reference to forests.

Page 55 – The NPA ACT strongly supports the target for no ‘net loss of the ecological and cultural values of woodlands and to maintain or improve the proportion of each woodland community located within the ACT’s formal reserve system’. If this target and associated actions were achieved in the next 5 years, it would be a major contribution to woodland conservation in the ACT. While the inclusion of woodlands in the ACT reserve system is the NPA’s preferred approach, incentives should also be available to off-reserve land managers to protect and maintain woodlands under their management. In addition, significant woodland areas in the ACT are under Commonwealth management. The NPA ACT therefore recommends that an agreement is entered into with the Commonwealth to protect all lowland woodlands under its control. This would be consistent with what is proposed on page 58 for grasslands.

Page 56 – The NPA ACT also strongly supports the NR Plans grasslands target of the conservation “of all remaining areas of native grassland in the ACT that are in moderate to high ecological condition regardless of land tenure including urban open space and roadsides.” As the NR Plan recognises native grasslands have been subject to significant pressures since European settlement of the ACT, with their extent reducing by 90%. The continuation of these pressures requires the application of consistent, targeted measures to conserve and enhance the remaining 10%. The current development proposal at North Lawson demonstrates the need to work with all land managers to avoid any further losses of native grassland ecosystems and consistent with our statements re woodlands the NPA ACT. The proposes action on page 58 to collaborate with Commonwealth land managers is important and should be implemented immediately to protect the North Lawson grasslands. Ultimately, an agreement should be entered into to ensure the long-term conservation of all important ecosystems in the ACT under the control of the Commonwealth.

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Various actions in the NR Plan will result in additions to the ACT's reserve system and the NR Plan should identify strategies to ensure that there is additional funding for ongoing maintenance.

Page 61 - It is good to see some recognition of native invertebrates due to their important role in pollination of native plants. Invertebrates and fungi also play other key roles, such as predators and food for vertebrates in the environment. We have seen a significant decrease in insects, and this is an additional pressure on our ecosystems, not recognised in the NR Plan.

Page 67 - The section on Governance is very important to the NR Plan and the lack of coordination across government functions was identified as a fault in the previous NRM plan. The targets and actions identified on page 69 will need determined work to achieve an improvement in this area.

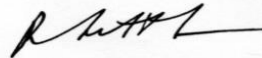
Should you require any further information on our comments or our organisation, please do not hesitate to contact Mr Rod Griffiths, convener, NPA ACT Environment Sub-committee on 0410 875 731 or rod.blackdog@gmail.com.

Yours sincerely

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