



# Friends of Grasslands

supporting native grassy ecosystems

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## **Submission to the Senate Standing Committee on Environment and Communications**

### **Inquiry into the effectiveness of threatened species and ecological communities' protection in Australia**

Friends of Grasslands (FOG) is a community group dedicated to the conservation of natural temperate grassy ecosystems in south-eastern Australia. FOG advocates, educates and advises on matters to do with the conservation of grassy ecosystems, and carries out surveys and other on-ground work. FOG is based in Canberra and its members include professional scientists, landowners, land managers and interested members of the public.

FOG is concerned about the endangered communities of Natural Temperate Grassland (NTG) and White Box-Yellow Box-Red Gum Grassy Woodlands and derived native grasslands (Box-Gum Woodland), and about a number of endangered or vulnerable grassland species including the Grassland Earless Dragon, Pink-tailed Worm-lizard, Golden Sun Moth (GSM), Button Wrinklewort and Small Purple Pea. Over the past few years we have seen more high quality areas placed in reserves and a shift in attitudes from complete destruction to avoidance, mitigation and offsetting. Despite this, there has been, across the landscape, a decline in these threatened communities and species, both in terms of the area they inhabit, the quality of habitat or size of the population remaining. FOG's view is that the current mechanisms and resources are not effective in preventing loss of these threatened communities and species, with the possibility of extinction in the future.

The following provides some details under each of the terms of reference.

#### **(a) Management of key threats to listed species and ecological communities**

FOG does not believe that some key threats to listed species and communities are managed effectively. In particular, land clearing, fragmentation, weed invasion and inappropriate fire regimes continue to result in the decline of grassy ecosystems.

There has been a continual stream of development applications that call for the clearing of areas of NTG, Box-Gum Woodland, or habitat for grassland-dependent species. While in recent years efforts have been made to avoid high quality areas where possible, and to mitigate the impacts of construction, areas of listed grassy ecosystems or habitat have still been destroyed to make way for urban development of one form or another. Some examples of such development proposals currently being assessed include areas in Campbell, Moncrieff, Throsby, Kenny and Kinlyside in the ACT.

In terms of mitigation, FOG considers that not only does it cost less to avoid damage than to restore the functions of ecosystems after damage has occurred, but that in many cases the knowledge or available material to restore these ecosystems properly is lacking.

Recently we are seeing offsets proposed where such destruction is considered “unavoidable”, but FOG has concerns about the long term effectiveness of offsets in conserving our natural heritage. Of the offset packages we are aware of, none have been in existence long enough to reassure FOG that the final result won’t be a net loss to the grassy ecosystems we are concerned about. While we acknowledge that intentions are generally sincere, we are also aware of the lack of knowledge of and problems with some of the rehabilitation attempts on grassy ecosystem sites. In fact, FOG’s view is that there should be no development that impacts on vulnerable or endangered species habitat or ecosystem communities, and therefore no need for offsets at all – unfortunately, reality is different and the danger is that offsets will be seen as a way to buy off the environment and consequently lead to loss of species and communities.

Inappropriate fire regimes impacts on grassy ecosystem reserves. For example, in many existing ACT reserves the bushfire Outer Asset Zone is required to be within nature reserves due to the proximity of the urban area. This means that the outer edge of high quality reserves such as Mulligans Flat Nature Reserve needs to be managed for bushfire rather than conservation because of the adjacent housing. Bushfire Outer Asset Zones are often still being proposed to be in nature reserves rather than development footprints. While in some cases it may be possible for bushfire and conservation management to be compatible, FOG is not convinced that this should be the presumption.

Weeds are a serious threat to our grassy ecosystem reserves and non-reserve areas. The major problem with weed control is resourcing – insufficient resources are available to control all of the invasive weeds threatening our reserves, let alone other weedy species.

FOG has been arguing for some time that conservation of grassy ecosystems in south eastern Australia needs to be undertaken on a landscape-wide basis, rather than on a piecemeal approach of considering specific development proposals and their impact on endangered and threatened species and ecosystems. For example, residential developments impacting on endangered Natural Temperate Grasslands and grassland-dependent species in the Gungahlin area of the ACT have been put forward section by section, rather than adopting a strategic approach to development in the entire area. That there has been some improvement in this area recently with increasing emphasis on conserving connecting corridors as well as high quality sites is strongly supported. This emphasis does not always translate into reality. A range of factors contribute to this, including a lack of resources to care for and rehabilitate native vegetation, pressures from increasing urban development, a lack of understanding in the wider community of the importance of biodiversity and the long term impact of its decline, and (except in regard to birds) inadequate information relating to which groups of species are advantaged by corridors, which may also include pest species.

### **(b) Development and implementation of recovery plans**

Action Plans have been developed by the ACT Government for the recovery of threatened grassland and grassy woodland communities and species. However, few national Recovery Plans for threatened grassy ecosystem species have been finalised. Even where they do exist, they lack effectiveness, primarily due to a lack of resources and focused attention. The ACT’s Commissioner for Sustainability and the Environment (CSE), for example, reported on the condition of NTG sites in the ACT some years after the listing of NTG as endangered and after the development of an Action Plan. She reported that 40% of areas containing NTG in the ACT were approaching a critical condition, and made a number of recommendations to remedy this situation. Since then, some of the CSE’s recommendations have been implemented effectively,

but many are still either not implemented at all or have only been partially implemented. It is hard to see how anything other than further decline is likely until more resources are made available for better management of these and similar areas.

### **(c) Management of critical habitat across all land tenures**

There are issues in the ACT in relation to management of NTG and Box-Gum Woodland across different land tenures. Important grassland reserves fall under the management of the National Capital Authority (NCA) (Yarramundi Reach and Stirling Ridge) and Commonwealth government agencies. The primary role and expertise of these agencies is not land management, particularly management of endangered ecosystems, and they can lack the skills and interest to manage these areas appropriately. In fact their role is at times at odds with conservation of our endangered ecosystems. For example, the NCA has recently released draft amendments 78 and 80 to the National Capital Plan for public comment. In these, the NCA is proposing to change the land use policy from "National Capital Use" to "Open Space" for Yarramundi Reach and Stirling Ridge, which will assist the conservation of endangered grassy ecosystems in these areas and is something FOG sees as a positive step. On the other hand, the NCA needs to find land for more diplomatic embassies, and one proposal is to place these adjacent to the endangered Box-Gum Woodland and Button Wrinklewort on Stirling Ridge. FOG's view is that it is inevitable that long term impacts from the proposed embassy development will degrade the high conservation value land nearby. The same draft amendments propose to set aside an area on Attunga Point for consideration of building a new Prime Minister's Lodge that will directly impact both Box-Gum Woodland and two populations of Button Wrinklewort (when another alternative, to put a new Lodge on the same land as the existing Lodge, exists). Another issue is how the ACT Government will work with other entities to manage the significant areas of grasslands and woodlands that occur across the urban environment.

### **(d) Regulatory and funding arrangements at all levels of government**

One issue specific to the ACT is the different roles of the ACT Government in relation to environmental regulation and decision making. The Government owns most of the ACT's land and, via its Land Development Agency, is the proponent in many development proposals affecting threatened grassy ecosystems and species. At the same time, the ACT Government also evaluates environmental impacts, a clear conflict of interest. If the Environment Protection and Biodiversity Conservation Amendment (Retaining Federal Approval Powers) Bill 2012 (subject to a concurrent Senate Inquiry) goes through, the ACT Government will, under bilateral agreement, be making decisions about development approvals it has put forward. It is difficult to see how this can result in anything other than further losses of grassy ecosystems to urban development over time and successive governments and it is a clear conflict of interest.

In the past the lack of a strategic approach has been detrimental to the conservation of grassy ecosystems. Strategic assessments are now being undertaken in some instances but are, however, only useful if their recommendations are taken on board and implemented in the long term. While the strategic assessments undertaken to date in the ACT have been useful, the long term impact of them in terms of an improved conservation outcome is still to be seen.

Adequate funding for protection of threatened grassy ecosystems and species is an ongoing problem. While there is generally good intent, on-ground staff are hampered by lack of resources in many areas, including regeneration activities, on-going management of reserves, weed control, monitoring and research.

**(e) Timeliness and risk management within the listings processes**

FOG's view is that the process for listing a species or ecological community is a lengthy one, and needs to be shortened. Revision of existing listings is also an issue: FOG believes that the species list for the Box-Gum Woodland listing needs revision (the latest information is dated as 2006). FOG understands that the listing for NTG has been reviewed for possible revision, but has not yet been put out for public consultation nor finalized.

**(f) The historical record of state and territory governments on these matters**

The ACT Government has been active in reserving some of the best examples of NTG and Box-Gum Woodland in the area. On the other hand, other smaller areas have been allowed to deteriorate (possibly as a result of inadequate management), to the point that they are now targets for urban development, in part because of their poor condition.

Some of FOG's concerns in relation to the ACT Government's management and protection of our endangered grassy ecosystems and grassland-dependent species have been provided as examples above. Another is the length of time the ACT government takes on environmental policies and legislation. At present, the ACT's Nature Conservation Act, Environmental Protection Act and Nature Conservation Strategy are all under review, the former for the past two years. FOG has been waiting even longer for public release of the ACT's offsets policy. Despite this, decisions are being made about developing land that contains areas of native grasslands or grassy woodlands, and about what constitutes a suitable offset for such destruction.

Sincerely yours

John Fitz Gerald  
President

14 December 2012