



National Parks Association of the ACT Inc.  
1960-2010  
*50 years of conservation, nature protection and education*

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## **Submission to the Draft ACT Nature Conservation Strategy 2012-22**

Thank you for the opportunity to make a submission on the draft ACT Nature Conservation Strategy (the draft NCS) 2012-22. The National Parks Association of the ACT (“NPA ACT”) is a community-based conservation organisation with a fifty year history of working to protect our natural environment through active outings and workparty programs; participation in Parkcare activities; an extensive publication program; public meetings and conferences and engagement with government policies and programs. The NPA ACT has a particular interest in how the ACT’s conservation reserves are managed and how biodiversity is protected.

The NPA ACT believes that the draft NCS requires considerable work before it can be issued as final. It lacks many key factors of a good strategy document and its development should be closely informed by the revision of the *Nature Conservation Act 1980*. The draft NCS fails to provide ways forward for resourcing the many programs required to implement it. The NPA ACT’s comments supporting the above statements are listed below.

### Nature Conservation Strategy 1997

The draft NCS seeks to replace the first Nature Conservation Strategy (NCS 1997), written in 1997. The NCS 1997 was a substantial 119 page document, well regarded and still very relevant after 15 years. In particular, the NCS 1997 gave context, rationale, a way forward, objectives, actions and performance indicators. The comprehensive adoption of these characteristics would improve the draft NCS. Both the NCS 1997 and the draft NCS lack the identification of strategic priorities.

### Review of the 1997 NCS

The development of the draft NCS should have been preceded by a published review of the NCS 1997 outlining the achievements and shortcomings and changed circumstances (eg climate change) and an indication of what directions a new strategy might take, for example focal landscapes. A workshop involving interested parties could have provided useful ideas. This analysis would have provided significant guidance to the development of the draft NCS.

### The Nature Conservation Act 1980

After public comments on revisions to the *Nature Conservation Act 1980* (NCA) were called for in a discussion paper dated November 2010 no more has been heard of this proposed legislative change. The draft NCS fails to link comprehensively with the NCA. The NCA and the NCS are intrinsically intertwined and the drafting to the NCS should be done in concert with the updating of the NCA.

### The Vision of the New NCS

It seems incongruous that a nature conservation strategy would in its vision list the needs of people before the needs of the environment. This is a nature conservation strategy, not a recreation strategy. The Strategic Goal in the NCS 1997 is still relevant and should be the basis of the draft NCS' vision statement.

What is important to recognise is the people are responsible custodians of the natural heritage and, at the community level, individuals and groups actively involve themselves in nature conservation.

### Nature Conservation Strategy approach

The draft NCS contains many statements that are difficult to disagree with, however, as a strategy it lacks priorities and a clear discussion on how its many proposals are going to be resourced. The strategy needs to elaborate on what are the key threats/risks to the natural environment and seek to address these. The Strategy has few specific research or science objectives and these are not easily discernible from the body of the Strategy. There is no listing of research objectives.

### Restoring the ACT's Focal Landscapes

While the NPA ACT is not opposed to the use of Focal Landscapes, it seems incomprehensible that the draft NCS provides little commentary of the approximately 60% of the ACT not in the four Focal Landscapes. This 60% of the ACT is categorised as "other" and includes most of Namadgi National Park, Tidbinbilla Nature Reserve, Kowen district (eastern ACT), the sites of existing and former pine forests, the Paddys, Gudgenby and Naas Rivers and their associated riverine land, Mt. Stromlo and some rural land east and west of the Murrumbidgee River.

While some of this area is covered by plans of management, much isn't. For all these areas the Draft NCS should consider whether there are significant threats or risks to maintaining or enhancing the conservation values of these lands. It is important for the draft NCS to consider how these areas interact with the four focal landscapes and with each other. The draft NCS should provide assessment of how the threats and risks in the "other" area will be addressed. While this may not be as comprehensive as analysis and actions proposed for the Focal Landscapes it is still important for the draft NCS to include such assessment.

The "Water catchment" Focal Landscape incorporates land formerly pine forest destroyed in the 2003 bushfire and land managed by ACT Forests, which is now undergoing revegetation to native bush. There are similar areas of land in the Paddys River catchment ("Other") which should be part of this Focal Landscapes classification.

Most of Canberra Nature Park appears to be in the Rural Landscape category which would appear inappropriate for reserves such as Ainslie, Majura or Black Mountain. This simplistic categorisation of Focal Landscapes needs a rethink.

Strategy 1 Develop baseline information on landscape function.

Baseline information is extremely valuable but the data bases need to be maintained and the information made publicly available to help guide community input and comment.

Strategy 3 Protect species and ecological communities.

3.2 Develop, implement and review Action Plans for threatened species and communities.

The review of Action Plans should be spread out to provide an even workload for staff/contractors and assist community input. There needs to be agreement on review priority, ten years may be not soon enough or too soon.

3.4 Identifying biodiversity refugia under drought and climate change.

It is unlikely that areas identified as refugia for threatened species in times of drought would not already have high conservation values. In relation to climate change connectivity is the more important feature to facilitate the permanent movement of species to more favourable locations.

Strategy 4. Enhance biodiversity value of urban areas.

4.4 Managing the urban edge.

The discussion of what happens on the urban edge focuses almost solely on the Bush on the Boundary (BoB) program managed by the Conservation Council of the ACT Region. BoB is a program that has focussed on new developments in Gungahlin, Molonglo Valley and in the future Eastlake. Many kilometres of urban interface already exists where house blocks, roads and other infrastructure butt up against Canberra Nature Park and other reserves. How is the government going to manage these important impact areas? Here the impact of dumping, weeds, fire and domestic animals is magnified. While community groups are doing their bit the draft NCS should indicate what the government will be doing particularly in managing dumping, off road mountain biking and wandering domestic animals which are all threatening processes.

5 Monitoring and review.

5.2 Review

The NPA ACT does not believe that the Conservator is sufficiently independent enough from the agency(s) overseeing the Nature Conservation Act and the Nature Conservation Strategy to monitor the effectiveness of the management of biodiversity. Ideally, the Conservator should be an independent position in the ACT reporting directly both functionally and administratively to the ACT Government. If current administrative arrangements were to persist, the NPA ACT believes that the Commissioner for the Environment and Sustainability


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should fulfil this role, but this position would need additional resources to adequately acquit this role.

It is noted that although it is recommended that the finalised draft NCS "be comprehensively reviewed towards the end of its 10 year life to ensure that it remains current" no review of the NCS 1997 took place to facilitate public engagement in the development of the draft NCS. The NPA ACT would strongly recommend that, as a minimum, a mid-term report against the proposed outcomes of the draft NCS be published and made available for public comment.

The NPA ACT would be happy to discuss any of the issues raised within its submission, either in writing to our office address or through email (noting that the NPA ACT office is manned by volunteers and a daily presence is not able to be maintained). Alternatively, I can be contacted on 0410 875 731.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Rod Griffiths', is centered on a light-colored rectangular background.

Rod Griffiths  
President

10 December 2012