



**CONSERVATION
COUNCIL** ACT REGION

Submission to ACT Government: Natural Resource Management Plan Discussion Paper

June 2021

The Conservation Council ACT Region is the peak non-government environment organisation for the Canberra region. Since 1981, we have spoken up for a healthy environment and a sustainable future for our region. We harness the collective energy, expertise and experience of our more than 40 member groups to promote sound policy and action on the environment.

We campaign for a safe climate, to protect biodiversity in our urban and natural areas, to protect and enhance our waterways, reduce waste, and promote sustainable transport and planning for our city. Working in the ACT and region to influence governments and build widespread support within the community and business, we put forward evidence-based solutions and innovative ideas for how we can live sustainably.

At a time when we need to reimagine a better future, we understand that the changes we need will only happen with the collective support of our community.

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Introduction

Globally we are facing an unprecedented extinction crisis, as human actions have a damaging effect on the natural systems that sustain us. The 2019 United Nations report on biodiversity identified globally that up to one million species face extinction in coming decades.¹ Australia is not immune, with approximately 100 native species having become extinct since European settlement and a further 1,600 species that remain threatened.² Yet we rely on nature for all aspects of human wellbeing; food, medicines, as well as culture, recreation and learning. Biodiversity, and the natural habitats that support it, are indeed our life-supporting “safety net”.

Despite its small size, the ACT hosts a variety of diverse landscapes, habitats and ecological communities, many of which are unique to the region. Yet nature has been impacted through the encroachment of urban areas on habitats, loss of habitats, and invasive plants and animals.² The inherent conflict between development and environment continues to threaten habitats, and is further exacerbated by the impacts of climate change, which continues to worsen in the face of global inaction. This renders it even more urgent to protect and enhance what remains.

The summer of 2019-20 saw Australia ravaged by intense, simultaneous bushfires. The Orroral Valley fire, which tore through Namadgi National Park and Tidbinbilla Nature Reserve, burnt 37% of the ACT.³ The full extent of ecological damage to species, habitat and ecosystem functioning, including water quality, is still unfolding, but there are enormous challenges for the long-term conservation of regional and nationally-significant ecological communities and biodiversity. Importantly, this, combined with increasing average temperatures, extended drought periods and increasing dust storms, has prompted a fundamental rethink about the way we engage with nature, its value to us, and its own intrinsic value, that could be integrated in the ACT's next NRM Plan.

Progress since the ACT's last NRM Plan

In 2008, the ACT Natural Heritage Resource Council released “The Bush Capital Legacy - iconic city, iconic natural assets” as the Plan for managing the ACT's natural assets.

The Plan outlined the case for change in its first chapter, highlighting the “serious depletion” (page 4) of the ACT's woodlands and grasslands, our substantial ecological footprint at 11 times the areas of the Territory, (page 5) and a lack of resilience across our landscapes (page 7). Importantly the last NRM Plan also set targets - for the community, for land use, water and biodiversity. The targets were set to “guide natural resource management actions for

¹ IPBES (2019), *Global assessment report on biodiversity and ecosystem services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services*. Chapter 2.2: Status and Trends - Nature, (p. 52).

² CSIRO (2014), [Science and Solutions for Australia: Biodiversity](#), (p.44).

³ ACT Rapid Risk Assessment Team (2020). *Orroral Valley Fire Rapid Risk Assessment Namadgi National Park*, (p.6) ACT Government, Canberra.

government and the community” and did not impose any data collection requirements on any one agency, and reporting was to be aligned with the ACT’s State of the Environment Report.

The ACT Commissioner for Sustainability and the Environment (OCSE) released the ACT State of the Environment Report in 2019, close to the end of the life of the 2008 NRM Plan. While there were some positive outcomes and improvements in the ACT’s sustainability (in the main generated by the transition to 100% renewable electricity), the SOE Report did not tell a positive story with regard to the ACT’s biodiversity and natural resources.

While in 2008, the ACT had 17 endangered species and an additional 14 listed as vulnerable, the 2019 SOE report identifies, some 52 species of fauna and flora are listed as threatened under national and/or ACT environmental law⁴ - 7 critically endangered, 18 endangered, 26 vulnerable and 1 regionally conservation dependent. Since 2008, the status of two local ecological communities, Natural Temperate Grassland and Yellow Box-Blakely’s Red Gum Grassy Woodlands, has increased to Critically Endangered under the *Nature Conservation Act 2014*. In addition, the High Country Bogs and Associated Fens were added to the endangered category in 2019, and have faced increased pressure since then as a result of the impact of the Orroral Valley fire.

Targets established under the 2008 NRM Plan aimed for a trajectory that “show endangered species are becoming less threatened” by 2015, and an improvement in conservation listing status of endangered species and communities by 2030. It is clear that the ACT is on no such pathway to achieving these objectives.

What next?

The Conservation Council advocates for expanding the protected area network using a variety of methods to ensure management for conservation purposes of areas with ecological value well in advance of development or further loss.

All relevant stakeholders, including traditional owners, non-government organisations, community members and scientists, should be engaged in an extended stewardship approach that enhances our history of land stewardship, which has seen thousands of hours of investment by local landcare groups to improve local environments.

The ACT must also move to appropriately fund the broad range of strategies and action plans it has prepared to protect and restore biodiversity. Limited resources have left the implementation of these strategies curtailed, and put biodiversity conservation and enhancement at risk. Until biodiversity activities are adequately funded, including the systems required to monitor performance, improved environmental outcomes won’t be evident, and the ACT will continue to contribute to the national and global extinction crisis that puts much of life on earth at risk.

⁴ Commissioner for Sustainability and the Environment, 2019. *ACT State of the Environment - 2019 Report*, (p.208).

Offsetting future development should be avoided - we need to reconsider developments that impinge on endangered ecosystems and destroy further habitat. Any offsets that are approved should be utilised to benefit the ACT's biodiversity outcomes, and deliver enhancement over and above the implementation of already identified actions and commitments laid out in management plans, which should be funded by Government.

An NRM plan for the next decade should also focus on limiting the threat of urban development on important ecological communities and species in the ACT, and continue the focus to rebuild biodiversity across already established urban areas, integrating nature management principles and strategies across the urban landscape.

Principles

QUESTION 1: DO YOU AGREE WITH THESE PRINCIPLES? WHAT OTHER PRINCIPLES SHOULD GUIDE THE DEVELOPMENT OF THE PLAN?

The Conservation Council generally supports the above principles for the development of the MRM Plan however, would offer the following comments:

1. *Identify key threatening processes that the regional community is seeking to mitigate:*
This principle implies a responsibility on the new NRM Plan to identify key threats to natural resource management, and it is unlikely that they key threats to our natural resources have changed much since the 2008 NRM plan, where they were identified as:
 - a. Urban expansion
 - b. Fragmentation
 - c. Pest plants and animals
 - d. Climate change
 - e. Water extractions and waterway modification; and
 - f. Bushfire hazard

The wording of this principle could benefit from being strengthened to not only identify key threatening processes but also to develop a response to those threats. Indeed, the challenge perhaps isn't so much as identifying the threats, rather identifying the underlying actions that drive those threats, and then meaningful actions that will mitigate the threats.

2. *Provides an integrated strategic focus for protecting and managing the ACT's natural resources:* Again, the language in this principle should be strengthened. "Protecting and managing" sets a low ambition for conservation outcomes - rather we should embed into the principles that the NRM Plan should be developed with a view of "enhancing natural resources". The 2008 NRM Plan identified a focus to "repair and protect whole

landscapes” (page 7). Such an ambition would also acknowledge that sites that may be of lower condition are opportunities as places for ecological repair as we seek to build ecological resilience across the landscape. It could also focus resources and efforts on improving the quality of landscapes across tenures, both in and out of reserves, and including across the urban landscape (i.e., the implementation of protected area networks).

3. *Understands and encompasses the needs and expectations of environmental volunteers, the Aboriginal community, rural landholders, researchers, Landcare groups and the broader ACT community by including these stakeholders in the development and delivery of the plan:* in addition it would be worthwhile to articulate the commitment to community engagement, not just in the development of the plan, but also in the implementation of environmental / conservation outcomes across the ACT during the life of the plan. The principle could be extended to include “Support, builds and nurtures community engagement”.
4. *Embed a stewardship approach to biodiversity management -* We recommend articulating an additional principle that discusses adopting a collaborative land stewardship approach that incorporates the perspectives of different stakeholders including traditional owners, non-government organisations, community members and scientists to help sustain the long-term health of conservation areas such as Central Molonglo, and our environment in general.

Key Focus Areas

QUESTION 2 : ARE THERE OTHER MAJOR FOCUS AREAS IN NRM PLANNING WE SHOULD CONSIDER?

The Conservation Council supports the areas identified as a key focus for the NRM plan, however, would make the following additions:

1. Enhancement of urban biodiversity

Urban open space occupies approximately 20% of the urban area in the ACT. Urban open spaces are crucial in creating places that are valued and utilised by ACT residents and represent an under-utilised resource in terms of climate regulation and biodiversity enhancement.

The previous 2008 NRM Plan identifies that “defining and setting a measurable target for urban biodiversity depends on more foundational work” (page 52). It is the case that this work should be in the sights of the ACT government irrespective of the NRM Plan, given the recently established tree canopy target and the porous surfaces targets, both of which are related. Recently completed LiDAR analysis, due to be repeated every 5 years⁵ to enable effective monitoring and evaluation of canopy coverage and permeability across the urban footprint should be supplemented by other urban biodiversity indicators.

Restored urban greenspace provides opportunities to enhance biodiversity outcomes by planting diverse species in appropriate locations. While deciduous trees may be better utilised as street trees in suburbs, native trees and shrubs in urban parks and nature corridors will provide habitat and food for wildlife, including pollinators. Existing conservation areas within the urban landscape are important existing biodiversity nodes, from which biodiversity can be expanded; these require protection and be properly valued.

Mature eucalypts in the ACT are culturally, and environmentally, important. Large, mature native trees are unique features of the landscape that play a crucial role in connectivity across our urban forests, and provide nesting habitat and food for wildlife.⁶ However, mature trees are still being felled for greenfield urban developments and within established suburbs of the ACT.¹⁷ In 2018, ‘the loss of mature native trees (including hollow-bearing trees) and a lack of recruitment’ was listed as a key threatening process in the ACT⁷, and an action plan to respond is due.

⁵ Urban Forest Strategy 2021-2025, page 41.

⁶ Commissioner for Sustainability and the Environment, (2019). *ACT State of the Environment - 2019 Report*, (p.85. 200).

⁷ Environment, Planning and Sustainable Development Directorate (2019), *Key Threatening Processes*, ACT Government, Canberra.

2. Management of riparian and aquatic assets

The ACT's rivers, lakes, ponds and wetlands, and riparian vegetation, provide crucial support to local wildlife by providing food, refuge and habitat.⁸ However, water and riparian assets both regionally and nationally face significant challenges as a result of altered flow regimes, loss of riparian vegetation, pollution and invasive species.² Climate predictions, supported by recent experience, demonstrate the water challenges we will face as the climate becomes hotter, drier and more unpredictable.² Variations in the frequency and quantity of rainfall, as well as prolonged periods of drought, will have a significant impact on the availability and quality of water in the future.

Improving water quality across the ACT region is crucial to ensure that waterways remain healthy and are able to support wildlife and biodiversity. Increased monitoring of water quality and maintenance of existing water assets, in conjunction with an additional focus on rainwater and stormwater management, using water sensitive urban design and improved urban water permeability, will be important. A changing climate will result in more and larger storm events which, if falling onto unvegetated land surfaces, will transport significant amounts of sediment and nutrients into waterways.

⁸ Commissioner for Sustainability and the Environment, 2019. *ACT State of the Environment - 2019 Report*, (p.284).

Biodiversity Conservation

QUESTION 2 : WHAT ARE THE SPECIES, COMMUNITIES, AREAS OF ISSUES THAT SHOULD BE A MAJOR FOCUS IN NRM PLANNING

1. Increase representation of ecologically-threatened communities in the reserved system

The low representation of threatened ecological communities in the protected area network puts them even further at risk. The ACT is one of the last remaining regions where large, relatively unscathed patches of ecological communities including Yellow Box-Blakely's Red Gum Grassy Woodland and Natural Temperate Grasslands can be found. Yet in the ACT, nearly 50% of the Yellow Box-Blakely's Red Gum Grassy Woodland and 20% of Natural Temperate Grasslands are not in reserve.⁹ A number of threatened fauna have less than 50% of their known and potential habitat in conservation areas, including the Golden Sun Moth, Perunga Grasshopper and Grassland Earless Dragon.⁷

The ACT should move to increase representation of all poorly represented communities in the protected areas network. In the short term, the Newline Woodland (both the Defence and quarry sites) and Bluett's blocks are two examples of land that require protection, as they are two of the ACT's most biodiverse habitats, providing fugitive refuge for critically endangered species including the Swift Parrot.

Central Molonglo also contains one of the twenty largest remnants of Yellow Box-Blakely's Red Gum Grassy Woodland remaining in Australia.¹⁰ In 2008, the ACT Government agreed that Central Molonglo was not to be developed in perpetuity, as an acknowledgement that any development would impact significantly on biodiversity, including the loss of the last two breeding territories for the Little Eagle in the ACT¹¹ and nesting habitat for the threatened Superb Parrot. Management of Central Molonglo should place a greater emphasis on habitat enhancement, and the ACT should move quickly to develop a strategic management plan, tailored for specific flora and fauna, that protects and manages the conservation values of this area long term, allows it to become a focus for research and rehabilitation, and ensures it can be enjoyed for environmental and social benefit into the future.

⁹ Commissioner for Sustainability and the Environment, 2019. *ACT State of the Environment - 2019 Report*, (p.210).

¹⁰ Conservation Council ACT Region (2008), *Proposed Molonglo Urban Developments and their Significant Impact on Endangered Woodlands*, p. 6.

¹¹ Canberra Ornithologists Group (2008), *Molonglo Valley DV 281 (Molonglo and North Weston) Submission*, p. 6.

Climate change

QUESTION : HOW CAN NRM PLANNING BEST ADDRESS THE ISSUES ASSOCIATED WITH A CHANGING CLIMATE?

Climate change is one of the most significant challenges we face as members of the global community, and threatens the function of our natural ecosystems, the existence of our unique wildlife, and the ecological services that support human society. It will influence where and how we live, and has the potential to weaken global economic and social systems and result in wide-spread ecosystem collapse. *There is no safe level of continued global warming – every increment will do further damage.* Even with strong action to reduce emissions, we can expect more extreme weather events that will harm our natural places, our agriculture, health and economy.

Building resilience into our landscapes is a crucial consideration for natural resource management going forward. This NRM plan must include acknowledgement of the impacts of climate change and the implications this will have on every aspect of our natural environment and its management. Reforestation and reestablishment of native ecosystems can reap multiple benefits including carbon sequestration, return of biodiversity, improved soils, water retention and filtration, local cooling, better air quality, improved aesthetics for recreation and human health.

Sustainable agriculture

QUESTION: HOW CAN THE NRM PLAN BEST SUPPORT THE ACT FARMING COMMUNITY TO MAINTAIN SUSTAINABLE PRACTICES IN THE FACE OF EXISTING AND EMERGING CHALLENGES?

The NRM Plan should be developed in consultation with rural lease holders. Key issues for consideration to advance environmental management include: pest management that is sympathetic to the natural environment; ensuring production / land use that is compatible with good natural resource management; education and information that supports stewardship arrangements to ensure areas of biodiversity are retained and valued within the agricultural landscape, as part of the protected area network.

Ngunnawal cultural heritage and knowledge

QUESTION: HOW CAN NRM PLANNING BEST ENABLE THE INCREASE OF THE USE OF NGUNNAWAL KNOWLEDGE AND LAND MANAGEMENT METHODS IN THE ACT?

The Conservation Council fully supports the integration of Ngunnawal cultural heritage and knowledge being fully integrated into land management practices in the ACT. Ngunnawal people have a strong connection to the region of Canberra, and can provide insights that span issues such as fire management, appropriate habitat restoration and species protection.

Community Involvement

QUESTION: WHAT DO YOU THINK NEEDS TO BE INCLUDED IN THE NRM PLAN FOR THE ACT?

1. Strategic planning for land management and adoption of a stewardship approach

Adopting a collaborative land stewardship approach that incorporates the perspectives of different stakeholders including traditional owners, non-government organisations, community members and scientists would help sustain the long-term health of conservation areas such as Central Molonglo, and our environment in general.

In particular, the ACT should expand the existing protected area network, to not only include reserves managed by government, but also to facilitate protection in perpetuity of other land by means of conservation agreements attached to the land (not attached to the lessees), similar to the conservation covenants of NSW. In addition to rural land, this may include protection of other ACT territory land, including open space or roadsides. To ensure this can be achieved, it may be necessary to provide funding to apply conservation management and/or compensation for income lost.

Furthermore, conservation agreements attached to Commonwealth land should be encouraged, potentially with such areas to be managed by ACT Parks and Conservation (e.g. Newline). An agricultural liaison officer is required to oversee these land management agreements and assist rural lessees in conservation agreements. Incentives for rural landowners to conserve biodiversity values on their property over the longer term should be considered. This approach will achieve a comprehensive stewardship approach to our conservation estate, which builds on and reflects the Indigenous land custodianship culture and practice.

The Conservation Council would like to see the ACT Government develop and utilise strategic ecological assessments on all off-reserve land to identify areas of conservation value to be permanently excluded from development, and to legislate to ensure lands of moderate to high conservation value (including Natural Temperate Grasslands and Yellow Box-Blakely's Red Gum Grassy Woodlands) outside the reserve system are protected in perpetuity through a protected-area network, including introduction of voluntary stewardship / custodianship agreements, that result in effective conservation management.

Further work needs to be done to identify areas that are recently mapped and identified as having ecological values, including:

- Specific protections to recognise important biodiversity hubs: Newline Woodland, Bluetts Block, Piney Creek, Lands End, Woods Lane and Glenloch grasslands; and
- Identification of areas of the Western Edge Investigation Area for protection and commence conservation management under the stewardship system.

Where future urban development is proposed, it is critical that all areas of ecological value are identified and appropriately managed well in advance of identifying future development areas and commencing structure planning.

As such, all off-reserve land in the ACT, regardless of land tenure, should be subject to a comprehensive ecological assessment to identify where development should never occur (including areas where rehabilitation should commence, connecting areas that serve as wildlife corridors and breeding habitats such as hollow-bearing trees). This process will be critical for the Western Edge Investigation Area, which was identified for further investigation in the 2018 ACT Planning Strategy.

2. Established funding for biodiversity enhancement

Ongoing, secure and appropriate funding and subsequent resource allocation is imperative to achieve success with conservation efforts. Funding must be sustained across government and non-government sectors and deliver the protection and restoration of biodiversity, as well as servicing overall environmental protection and water management.

The ACT already has an impressive suite of conservation strategies that, if funded and fully implemented, would contribute to positive biodiversity outcomes. These include the Native

Grassland Conservation Strategy, the Native Woodlands Conservation Strategy and the Aquatic and Riparian Conservation Strategy. To ensure adequate protection of biodiversity and ensure that areas of conservation value are managed effectively, the ACT must commit to fund and fully implement all existing conservation strategies and action plans in a timely manner. This should be supported by the delivery of publicly accessible annual reports that outline the outcomes of these strategies against set performance indicators, and reported on in a timely way.

A long-term sustainable funding model should also be developed to ensure consistent, ongoing funding across all sectors to improve biodiversity conservation outcomes. This funding model should address Government commitments to improve the ACT's biodiversity outcomes and should also support ongoing stewardship of leasehold land and community conservation initiatives, as detailed below. The model should have flexibility in its structure to allow for adaptation in response to a changing landscape and climate into the future.

Offsets continue to be utilised across the ACT as a mechanism to counteract the impacts caused by new developments, however a recent review of the offsets in the ACT illustrated that offsets are unlikely to achieve no net loss and their management is not sufficiently transparent.¹² The ACT can play an active role in encouraging the Commonwealth to establish a nationally consistent offset scheme that follows the offset framework as developed at the EIANZ offsets conference in 2019¹³, to ensure the use of offsets is restricted and highly regulated to deliver best environmental outcomes for biodiversity, are not used on moderate to high conservation areas, and are regularly reported on using a public register. This will ensure consistency between states and reduce the loopholes that are currently allowing high and moderate conservation value areas to be developed. Offset funding should be used to achieve biodiversity outcomes over and above those outlined in Management Plans. Use of offsets should be restricted and regulated to be within the same bioregion (and preferable within the ACT) and demonstrate high quality conservation outcomes, with no habitats of moderate to high conservation value to be used as biodiversity offsets. There is room in the ACT for offsets projects to be targeted towards biodiversity enhancement that is over and above outcomes and actions outlined in existing Management Plans (which the ACT Government has a duty of care to deliver on.)

3. Pest plant and animal management

Invasive plant and pest animal species represent significant threats to biodiversity conservation.¹⁴ Threats have increased significantly after the 2019-20 bushfires with the restoration of native populations even more dependent on effective pest control strategies. Management of invasive plant and pest animal species in the ACT is effective where efforts are ongoing. Equally, funding for pests and weed management must be consistent, long-term, and responsive to when threats arise¹¹, such as intensive invasive plant and pest control strategies

¹² Connors, B, (2019) A review of biodiversity offsets implemented in the Australian Capital Territory under the *Environment Protection and Biodiversity Conservation Act 1999*, Honours Thesis.

¹³ EIANZ (2019). *2019 National Biodiversity Offsets Conference*, see <<https://www.eianz.org/document/item/5100>>.

¹⁴ Commissioner for Sustainability and the Environment, (2019). *ACT State of the Environment - 2019 Report*, (p.254, 207).

in bushfire affected areas where feral species such as deer have the potential to significantly hamper recovery.

Invasive pest species, such as the European rabbit and European red fox, remain a key threat to biodiversity in Canberra Nature Park, despite pest management strategies being in place. The impacts of these feral animals are particularly evident where Parkcare groups have erected grazing exclosures, whereby biodiversity outcomes inside the exclosures are more successful than those outside.¹⁵ Building an understanding of predator proof exclosures and native animal reintroduction trials, such as those occurring at Mulligan's Flat and Tidbinbilla Nature Reserve¹⁶, will help inform whether they can play a role in reducing the impact of invasive species and should be expanded as a conservation tool in the ACT. Management of current exclosures should also be improved to ensure they are resourced and maintained to deliver environmental benefit.

The introduction of cat containment across the ACT is a welcome initiative and will allow a comprehensive public conversation about the impact that cats have on native wildlife as the policy is implemented. (Studies indicate that domestic cats alone prey on 61,000 native birds, 2000 native mammals, 30,000 native reptiles and 6000 native frogs each year in the ACT.¹⁷) Hopefully this will drive voluntary uptake of containment by Canberrans over the next ten years as the current policy setting will continue to allow cats to roam across established suburbs well into the next decade.

The ACT would also benefit from enhancing current invasive species management strategies in our waterways to prevent and control outbreaks. Aquatic pest species are prolific in the ACT and native fish account for less than 30% of the total fish population.¹⁸ The future emergence of new pest plants and animals provides further threats, with invasive aquatic plants and diatoms, such as *Didymo* of increasing concern.⁶ As the ACT's rivers and streams connect downstream into NSW, the ACT has a responsibility to ensure that invasive pest plants and animals are not transmitted into NSW. Additional resources towards invasive species management would minimise existing and future threats.

4. Role of the community in natural resource management

In the ACT, community environmental volunteers play an important role in protecting and rehabilitating the environment. The Office of the Commissioner for Sustainability and the Environment in 2017 found that the estimated value of volunteer activity in the ACT to be in

¹⁵ ABC News, (2015). '[Eastern Bettong numbers booming inside fenced-off reserve in Canberra](#)', News Article, 12 February.

¹⁶ ACT Government, 2019. Tidbinbilla Nature Reserve: Endangered Species Breeding Programs, accessed 8 May.

¹⁷ Environment, Planning and Sustainable Development Directorate 2019, [Draft ACT Cat Plan 2019-29](#), ACT Government, Canberra.

¹⁸ Commissioner for Sustainability and the Environment, 2019. [ACT State of the Environment - 2019 Report](#), (p.279).

excess of 22% of total ACT Government expenditure on the environment, clocking up in 2015-2016 an extraordinary \$50.5m in replacement wage costs.¹⁹

Community volunteers are supported and coordinated by non-government organisations, particularly the ACT Catchment Groups and their peak-body Landcare ACT, and build partnerships between communities, businesses, researchers and government. However, it can be challenging for groups to plan in advance and facilitate ongoing efforts without secure and ongoing funding.

The ACT community also significantly contributes to our understanding of local ecosystems and their health, especially through the collection of data via citizen science programs such as Canberra Ornithologists Group, Frogwatch, Waterwatch, Vegwatch and the Wild Pollinator Count. Whilst the ACT Government has previously shown support for citizen science projects including through the provision of short-term funding, funding is not consistent. Well-resourced citizen science programs will enhance local partnerships between community and Government to deliver better conservation outcomes. It is especially important that the government supports the collection of data by citizen science groups with long-term monitoring programs and specialist expertise to undertake the analysis of data.

Across the ACT, catchment groups, such as the Southern ACT Catchment Group, Ginninderra Catchment Group and Molonglo Conservation Group, play an important role in preserving aquatic habitats through coordination of local volunteer groups and data collection that provides knowledge about the health of water ecosystems within the ACT. These organisations require secure and extended funding to support the efficient and effective management of their activities. Strengthening the scope of activities able to be performed by volunteers will result in enhanced ecology and higher quality data, which leads to improved riparian and aquatic outcomes.

When the community is able to engage in and learn about their local natural environment, it empowers them to contribute and take on a stewardship role. The ACT has an excellent citizen science platform, Canberra Nature Map, with approximately 3000 members and more than 1.2 million records, to which the community adds data. Canberra Nature Map has supported biodiversity conservation in the ACT by storing decades worth of data on local biodiversity populations. Such initiatives cost governments little, but financial support can make a considerable difference to their effectiveness. Adequate funding support of Canberra Nature Map would ensure that the software can be maintained into the future and facilitate review and analysis of the data. Including data about species population monitoring, vegetation condition and vulnerable areas on ACTmapi would also assist with greater community access to transparent, accessible and relevant information and reports about conservation management.

The successful Adopt a Park program allows the community to get actively involved in the conservation, presentation, and maintenance of Canberra's public urban open spaces²⁰, and plays an important role in enhancing biodiversity connectivity across the landscape. Thirty-three

¹⁹ OCSE, 2017, Environmental-Economic Accounts for ACT State of the Environment Reporting, proof of Concept, ACT Government, Canberra.

²⁰ Transport Canberra and City Service, (n.d), *Volunteering*, ACT Government, Canberra.

projects to the value of \$183,989, were successful in the latest round of grants, which will contribute to the improvement of the ACT's neighbourhood parks through weed and erosion control, tree-planting and training events.¹¹ Programs such as this build community capacity and are a 'value-add' investment for Government.

The Conservation Council strongly supports consistent funding that builds capacity, expertise and generously supports the work of environmental volunteers and citizen science. Community groups are genuine partners in on-ground delivery, and substantially value-add to natural resource management. The solutions to many of the environmental challenges that we face sit within the ACT community. The ACT Government will benefit from harnessing the ideas, expertise and skills of the community to promote the conservation of our unique environment, and sustainability practices that reduce our impact.

QUESTION: WHAT CHALLENGES DO YOU SEE FOR NATURAL RESOURCE MANAGEMENT IN THE ACT OVER THE NEXT DECADE?

The Conservation Council identifies three key challenges for natural resource management in the ACT over the next decade:

1. Impact of urban development on habitat loss

The ACT continues to lose important ecological habitats as a result of our expanding urban footprint. The ACT is a growing city, and while the current commitment is to ensure that only 30% of green field housing development is occurring outside of the established urban footprint, there is no sign of slowing housing demand. Ongoing development is putting biodiversity at risk, and as such, should be strictly limited. The Conservation Council supports a focus on urban infill (after appropriate assessment and protection of ecological values) ahead of new greenfield development, and a "green belt" designed to benefit biodiversity and to serve as a marker of the end of urban development, just as hills, ridges and buffers served a younger Canberra.

The Conservation Council does not support further urban development west of the city, and supports an 80% infill target in the short term. However, in the medium term, the underlying drivers of urban expansion need to be addressed.

2. Climate change

Climate change: the discussion paper rightly identifies climate change as a key challenge for the ACT going forward, and this is discussed above.

3. The diminishing return on offsets

As the ACT's available land is diminished through an ever expanding urban footprint, options to offset the impact of urban development within the ACT are diminishing. In addition, the effectiveness of offsets at improving and protecting biodiversity, and delivering on additionality in the ACT is questionable. Offset areas appear to have replaced or displaced the ACT's reserve acquisition program, and future acquisitions seem unlikely given the proposed areas for new development.

Clarity around what is available for offset-funded projects in the ACT would improve transparency for both developers and those aiming to protect and enhance biodiversity. Offset funding should be redirected to enhance biodiversity quality more effectively within the ACT, and where management plans fail to deliver these objectives.

QUESTION: HOW WOULD YOU LIKE TO BE ENGAGED THROUGH THIS PLANNING PROCESS?

The Conservation Council welcomes ongoing engagement during the development of the plan. It would be helpful to better understand how the plan will guide investment in biodiversity programs across EPSDD. We would appreciate having the opportunity to view the Draft NRM plan when it is released, and having enough time to consult with member groups prior to making our submission. We were grateful to have an in person discussion with EPSDD officials during this consultation process and would appreciate the opportunity to do that again once the Draft Plan is released.