



**CONSERVATION
COUNCIL** ACT REGION

Submission to the Commonwealth Department of Agriculture, Water, and the Environment: Proposed Changes to Conservation Planning Decisions under the EPBC Act

November 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.

For further information please contact:

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Introduction

The Conservation Council ACT Region welcomes the opportunity to provide feedback on the proposed changes to conservation planning decisions under the EPBC Act. The following submission was made via online survey on the 1st of November 2021.

Natural Temperate Grasslands of the South Eastern Highlands

Do you agree or disagree that the recovery of this species can be effectively guided through a conservation advice and should no longer have a recovery plan under the EPBC Act?

Disagree

Please provide your reasons for your response

Natural Temperate Grasslands of the South Eastern Highlands (NTG) is a highly vulnerable ecological community as evidenced by its recent upgrading from endangered to critically endangered under the EPBC Act. Indeed, The pre-settlement range of NTG in the South Eastern Highlands is estimated to be in the order of 500,000 ha. Today, this range is highly depleted; it is estimated that only about 1% of the pre-settlement extent is now formally protected. The severe vulnerability of NTG highlights the necessity to protect every remnant patch that remains. In order for this to occur, it is recommended that the strongest form of legal protection is provided to NTG - recovery planning.

The high vulnerability of this ecological community is due in large part to NTG's aptitude for urban and agricultural development. NTG occurs in relatively flat areas, with high quality soil, and few trees. As such, it is repeatedly subject to development pressures. This further highlights the importance of strong legal protections for the ecological community.

Finally, strong protection for NTG will result in strong protections for vulnerable species that the ecological community supports. It is noted that some of these species, namely, the Golden Sun Moth, Striped Legless Lizard, Tarengo Leek Orchid, Ginninderra Peppercross, and Pink Tailed Worm Lizard are also subject to the proposed changes. It is accepted that it may not be viable to have recovery plans for all of these species; however, in light of this, NTG should be prioritised for recovery planning as its protection will have flow on effects to the species that it supports.

Please provide any other comments or concerns in relation to the Minister's proposed decision not to have a recovery plan for the species

We understand that requiring both recovery planning and conservation advice for every species and ecological communities is both time consuming and not necessarily effective. However, the solution of removing recovery planning and relying solely on conservation advice for conservation is not supported. Recovery plans are important conservation tools as they are legally binding on decisions made under the EPBC Act. In order to improve efficiency whilst maintaining this strong legal protection strategic multi-species plans could be utilised. We do not support the proposed mass removal of recovery plans.