



**CONSERVATION
COUNCIL** ACT REGION

Submission to ACT Government

Caring for Dhawura Ngunnawal: A natural resource plan for the ACT

November 2022

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:

Peta Bulling, Nature and Waterways Campaigner, peta.bulling@conservationcouncil.org.au.

Introduction

The Conservation Council ACT Region welcomes the opportunity to provide feedback to the *DRAFT Caring for Dhawura Ngunnawal - A natural resource plan for the ACT 2022-2042* (the Draft Plan).

On the backdrop of the triple planetary crisis of climate change, unprecedented extinction rates, and extreme pollution, the Draft Plan plays a significant role in conserving the Territory's increasingly-vulnerable natural environment. As acknowledged in the Draft Plan, protecting and managing the Territory's natural resources must encompass more than traditional (western) land management to be truly effective. Specifically, the Draft Plan's recognition and engagement of First Peoples is commended, as is the emphasis on collaboration with community and other stakeholders.

The Conservation Council ACT Region is supportive of the Draft Plan, and would like to take this opportunity to highlight some areas that should be considered with greater specificity, and discuss the application of the Council's co-authored "*Biodiversity Network*" policy to the actions and intentions of the Draft Plan.

Question 1: Have you read the DRAFT Caring for Dhawura Ngunnawal: A natural resource plan for the ACT 2022-2024? (required)

Yes.

Question 2: Did you participate in the 2021 consultation on the Natural Resource Management Plan Discussion Paper? (required)

Yes. Please see [here](#).

Question 3: How well does the DRAFT Caring for Dhawura Ngunnawal: A natural resource plan 2022-2024 for the ACT meet your expectations?

As expected.

Question 4: Do you support the vision for the ACT's natural resources outlined in the DRAFT Caring for Dhawura Ngunnawal: A natural resource plan for the ACT 2022–2024?

The intention of Draft Plan's vision to 'rewild' Canberra is supported as it provides an opportunity for the Territory to commit to stronger environmental protections and create a more sustainable city. However, the term 'rewilding' is questioned due to its connotations with colonial perspectives, namely that prior to invasion "Canberra" was an uncivilised wilderness. Furthermore revision is required to ensure that 'rewilding' is consistent with conservation goals, best practise ecological management, and does not construe natural values anthropocentrically.

Specifically:

- Best practice ecological management needs to be consistently applied to all areas in the ACT with high natural values, regardless of tenure. The proposed *Biodiversity Network*, discussed below, is an essential tool in achieving this. It is recommended that the vision statement be amended to support this system.
- 'Rewilding' should prioritise restoration and conservation of existing natural habitats, above restoration of degraded urban habitats. For example 70% of Natural Temperate Grassland communities are not protected in reserves despite being nationally significant.¹ The restoration and conservation of existing remnants should be prioritised above regeneration of urban areas. It is recommended that the vision statement be amended to reflect this.
- Caution must be taken to ensure that natural values are not framed anthropocentrically as nature has an intrinsic value - even if it does not directly or indirectly benefit humans.² This notion has been recognised in the Global Earth Charter which states, "that all beings are interdependent and every form of life has value regardless of its worth to human beings".³ It is recommended that the nuanced value of nature be explicitly outlined in the Draft Plan's vision statement, for example, "The 'rewilding' of Canberra: A city where nature is valued for its intrinsic worth; and treated as an essential element of a prosperous and healthy society..."

Recommendations

- Review the Draft Plan's vision statement to:
 - Support an ACT *Biodiversity Network*;
 - Prioritise restoration and conservation of existing remnants above regeneration of urban areas; and

¹ Calculations from ACT Government, *Canberra Nature Park Reserve Management Plan*, 2021.

² Rolston, *Philosophy Gone Wild: Essays in Environmental Ethics*, 1986; Callicott, *In Defense of the Land Ethic: Essays in Environmental Philosophy*, 1989.

³ Earth Charter International. *The Earth Charter*, 2000.

- Ensure that nature is recognised for its inherent value.

Question 5: Is there anything missing from the priority areas?

The priority areas identified in the Draft Plan are broadly supported, however further detail and some amendment to targets and actions is recommended as discussed below. Generally, targets and actions could be improved by providing for measurable outcomes with specific outputs and approximate timelines. Additionally, details on how the plan will be prioritised, resourced, and monitored would be helpful.

Cultural Landscapes

The identification of cultural landscapes as a priority area in the Draft Plan is supported. The application of Indigenous knowledge offers innovative ways to rethink and improve biodiversity conservation, while also achieving multiple social, cultural, and environmental outcomes.⁴ It is essential that First Peoples are actively and meaningfully engaged in drafting the NRM Plan and implementing it. Considering this, additional specific and targeted engagement of First Peoples is recommended as traditional consultation mechanisms can often be difficult for First Peoples to meaningfully engage with.

- Undergo additional and ongoing consultation with First Peoples to develop and implement the Draft Plan's targets and actions.

Community Connection to Nature

The identification of community connection to nature as a priority area is supported. Community connection helps people build deeper relationships with nature, those connections lead to caring, and caring leads to protecting. As discussed above, it is essential that community connection to nature is not valued above nature's inherent worth. This distinction should be discussed in the section on community connection to nature, particularly in reference to the definition and asset sub-sections.

In reference to the Draft Plan's commitment to "sustainable nature-based recreation", it is recommended that the target "increase opportunities for nature-based recreation" be reframed to enforce the idea that recreation in reserves can only occur where it is consistent with the primary aim of conservation. Some forms of recreation, such as mountain bike riding can be detrimental to ecosystems and can result in measurable impacts to vegetation, soil, water resources, and wildlife.⁵ As such, it is recommended that the relevant target be amended, for example: to "increase opportunities for nature-based recreation in an ecologically sustainable manner".

⁴ Goolmeer et al, Getting our Act together to improve Indigenous leadership and recognition in biodiversity management, 2022.

⁵ Quinn and Chernoff, Mountain Biking: A Review of the Ecological Effects February, 2010.

The Draft Plan's acknowledgment of the role of non-government organisations in cultivating community connection to nature is supported. As recognised in the Draft Plan the work of these organisations is only possible with funding and resource support from Government. Considering this, the commitment to further resourcing in the targets and actions sub-section is welcomed. It is recommended that funding for the expansion of core staffing in volunteer groups be included in these actions, this is particularly pertinent in reference to the ACT Environment Grants. Volunteer management and project oversight is often full-time work that requires skilled staff with experience in the relevant organisation and the sector. Under the current model, funding can only be provided for new staff which is difficult as recruitment can be challenging and projects often fit within existing staffing models. Providing for organisational infrastructure across the Territory is essential for volunteer engagement and community connection to nature thus it should be provided for under this priority.

- Ensure that nature's inherent value is considered in reference to community connection to nature, specifically in the definition and asset description;
- Amend the nature-based recreation target to ensure that development and recreation is done in an ecologically sustainable manner.
- Commit to funding for the expansion of core staffing in volunteer organisations, particularly in reference to the ACT Environment Grants.

Rural and Urban Landscapes

In the Council's 2021 submission to the Natural Resource Management Plan Discussion Paper, it was stated that:

“An NRM plan for the next decade should 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”.

We support the identification of urban expansion and intensification as a pressure in reference to urban and rural landscapes, however, it is noted that there is no comprehensive system proposed to protect areas of conservation value from this pressure. The Council also supports the theme of establishing a “well-managed, well-connected biodiverse series of corridors across the ACT's Urban Area” ; however, for this to be effective a landscape approach should be taken in that all land in the territory, including urban, rural and public land is considered holistically. To overcome these issues, it is recommended that a *Biodiversity Network* be implemented.

The aims of the *Biodiversity Network* are to formalise conservation and management of biodiversity outcomes on multiple types of public and leased land by identifying them as Conservation Areas, through a combination of protection, restoration and reconnection compatible with other land management objectives. A *Biodiversity Network* would achieve this by:

- Providing legislative protection to Matters of National Environmental Significance (MNES) that are not held in reserve;⁶
- Protecting natural attributes so that they do not become threatened;

⁶ Environment Protection and Biodiversity Conservation Act 1999 (Cth), Part 3 Div 1.

- Increasing landscape habitat, biodiversity and connectivity;
- Implementing consistent and best practice ecological management coordinated across land tenures; and
- Better engaging, cooperating with and supporting land managers, community, special interest groups and associated management and research professions.

Ecosystem Services

Providing for ecosystem services as a priority under the Draft Plan is supported. Particularly, the target of achieving 30% tree cover by 2045. When pursuing this target caution needs to be taken to ensure that trees are being planted in appropriate locations. This is particularly pertinent in the ACT as native grasslands and grassy woodlands are important ecological communities in this region. Planting trees can impact remnants of these grassy ecological communities by shading groundcover, introducing weeds, and providing habitat for predatory birds that hunt grassland fauna. Considering this it is recommended that the sixth action in the Draft Plan under the tree canopy goal be altered to state: “develop a sustainable and ecologically informed planting program to increase canopy cover equitably across the urban footprint without disturbing remnant grassy ecological communities”.

Question 6: How do you engage in natural resource management?

Conservation sector.

Question 7: How relevant is the DRAFT Caring for Dhawura Ngunnawal: A natural resource plan for the ACT 2022–2024 in supporting your engagement in natural resource management over the decade?

Relevant

Question 8: Is there anything further you would like to tell us in relation to natural resource management in the ACT?

The Council would like to provide feedback on the Draft Plan’s purpose. The emphasis on “collaborative management” as discussed is supported. Similarly to the vision statement, providing for the *Biodiversity Network* will be an essential tool in fulfilling this purpose. As above, it is recommended that the purpose should be reframed to ensure that the value of nature is considered for both its inherent value, and its value for people. This is particularly pertinent

where the plan contextualises the protection and restoration of the environment within “the broader economic, social and political context”.

Summary and Recommendations

The Conservation Council welcomes the opportunity to provide feedback to the ongoing engagement on the development of the Draft Plan. The Council is largely supportive of the Draft Plan, however there are some areas that should be considered with greater specificity. Furthermore, the Council’s co-authored “*Biodiversity Network*” policy is a positive opportunity to fulfil actions and intentions of the Draft Plan in an ecologically sustainable manner. Specific recommendations are outlined below:

Vision Statement and Purpose

- Review the Draft Plan’s vision statement to:
 - Support an ACT *Biodiversity Network*;
 - Prioritise restoration and conservation of existing remnants above regeneration of urban areas; and
 - Ensure that nature is recognised for its inherent value.

Cultural Landscapes and Engagement with First People’s Generally

- Undergo additional and ongoing consultation with First Peoples to develop and implement the Draft Plan’s targets and actions.
- Consider and consult on colonial language including “rewilding”

Community Connection to Nature

- Ensure that nature’s inherent value is considered in reference to community connection to nature, specifically in the definition and asset description;
- Amend the nature-based recreation target to ensure that development and recreation is done in an ecologically sustainable manner.
- Commit to funding for the expansion of core staffing in volunteer organisations, particularly in reference to the ACT Environment Grants.

Rural and Urban Landscapes, and land management generally

- Implement a *Biodiversity Network* that considers the land holistically and is tenure blind.

Ecosystem Services

- Amend the tree canopy goals to ensure that tree planting is ecologically appropriate.