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DRAFT Caring for Dhawura Ngunnawal - A Natural Resource Plan for the ACT 2022-2042

The Canberra Ornithologists Group (COG) wishes to provide brief comments on the Draft Caring for Dhawura Ngunnawal - A Natural Resource Plan for the ACT 2022-2042 ('Draft NRM Plan').

COG is a volunteer-based community group with around 450 members, with a mission that includes the conservation of native birds and their habitats in Canberra and the surrounding region. COG plays an active role in advocating for protection of native vegetation, and for the mitigation of threats to and impacts on native birds. COG undertakes surveys of birds, including long-term monitoring projects, that can usefully inform land use and land management actions, and has undertaken comprehensive bird surveys in ACT woodlands over several decades.

Overall, COG welcomes the Draft NRM Plan, and supports its Vision. While noting the many challenges acknowledged in the Draft NRM Plan, COG is hopeful that its transition into practical on-ground programs can make meaningful differences and improvements. Achieving this requires work at a landscape (ecosystem) scale, and COG welcomes the opportunities for this NRM Plan to address how different stakeholders can work together on initiatives to deliver this vision.

Bird habitats and long-term trends in woodland birds

COG sees the Draft NRM Plan as a way forward to improve bird habitats and connectivity mechanisms, particularly for small birds and for birds dependent on woodlands, which from COG's research are the birds in decline. COG therefore considers the NRM Plan should include reference to 'Unnatural Fragmentation of Habitats' as a Key Threatening Process under the *Nature Conservation Act 2014 (ACT)*¹, and the 'Loss of Mature Native Trees' Conservation Advice under this Act². In COG's view, addressing both these issues through the NRM Plan would have significant benefits for local birds through enhancement of their habitat.

¹ [Nature Conservation \(Unnatural Fragmentation of Habitats\) Conservation Advice 2019 | Notifiable instruments \(act.gov.au\)](https://www.act.gov.au/nature-conservation/conservation-advice/2019/unnatural-fragmentation-of-habitats)

² [Nature Conservation \(Loss of Mature Native Trees\) Conservation Advice 2018 | Notifiable instruments \(act.gov.au\)](https://www.act.gov.au/nature-conservation/conservation-advice/2018/loss-of-mature-native-trees)

COG has recently undertaken an analysis of its bird survey data from 142 sites in ACT woodlands from 1998 to 2019, with concerning findings³. These include:

- Declining trends for 32 species of bird, mostly small birds, but including birds generally regarded as common (16 species), birds dependent on woodland habitats, and both resident and seasonal species.
- Significant increases in large-bodied birds, including many common birds adapted to urban environments, and birds associated with degraded woodland communities.
- An unexpected decrease in the group of birds that feed primarily in the tree and tall shrub canopy, including insectivores and nectar feeders such as honeyeaters.
- A six-fold increase for Noisy Miner, an aggressive, colonial native honeyeater which can suppress and exclude other small birds.

Some ACT threatened woodland birds, such as Hooded Robin and Brown Treecreeper, have disappeared from peri-urban woodlands (including peri-urban reserves) and now generally occur only in small and isolated sub-populations in rural landscapes.

The need for rural based initiatives and programs in the NRM Plan

The Draft NRM Plan underemphasises rural initiatives and programs, particularly in relation to woodlands, compared with the emphasis given to urban programs, such as restoration of urban sites and urban forest programs. COG is supportive of urban habitat and connectivity programs, but considers the plan lacks balance. The NRM Plan presents an important opportunity to develop more integrated, whole-of-landscape conservation plans for remaining rural lands, including leasehold lands, that enhance woodland habitats and connectivity corridors. COG therefore suggests that the NRM Plan provide a strategic and integrated approach for rural lands, with principles and priorities for a whole-of-landscape approach, including for land subject to Land Management Agreements (LMAs).

The Draft NRM Plan (p.53) states that urbanisation – the development and expansion of new suburbs – is the primary cause of loss of woodland habitat in the ACT, and impacts negatively on connectivity and woodland habitat values. The plan has broad statements under ‘Targets and actions’, and includes (p.55) actions identified during stakeholder consultations about formally protecting remaining lowland woodlands and improving habitat connectivity. However, the NRM Plan needs to articulate a strategy and principles that would facilitate or underpin programs addressing loss of woodland due to expanding urbanisation.

In addition, large areas of rural lands to the west and south-west of urban Canberra to the Murrumbidgee River have potential for future Superb Parrot breeding habitat. Initiatives for Superb Parrot habitat could also be included in the NRM Plan, around breeding habitat enhancement and future nesting trees⁴.

³ <https://canberrabirds.org.au/conservation/woodland-birds/cog-woodland-bird-monitoring-project/>

⁴ The Canberra region is expected to become important, core breeding habitat for Superb Parrots under climate change. The ACT Government has already focussed much research on this species, which is listed as threatened under both ACT and Commonwealth legislation.

Rural Lands and Land Management Agreements

A key component of a landscape/ecosystem approach is the need to manage biodiversity across all land tenures, not just that in reserves. Off-reserve conservation is fundamental to an ecosystem approach, and areas of ecological significance on rural lands do not need to be put into the reserve system provided that they are well-managed for biodiversity outcomes, through robust measures with defined outcomes, monitoring and compliance. Management, protection and enhancement of biodiversity on rural lands is fundamentally important but not yet addressed in a coherent manner across all tenures in the ACT. The NRM Plan provides a good opportunity to facilitate an improved approach.

Land Management Agreements and Conservator's Directions are the principal mechanisms for biodiversity measures on rural lands. The Draft NRM plan notes (p.29) that "Land Management Agreements (LMA) are put in place as part of leasehold arrangements to help landholders manage their land sustainably with respect to natural values." However, the 2021 Audit of Land Management Agreements concluded that "The value of Land Management Agreements is questionable"⁵ and that LMAs as operating in the ACT were not fit for purpose, with compliance noted as a key issue.

The 'Rural Landscapes' section of the Draft NRM Plan (pp.28-32) raises important issues, but greater priority needs to be given to the importance of mature native trees, native vegetation and biodiversity in the rural landscape, including more targets and actions to ensure protection and enhancement of these values. Key elements needed on rural lands are:

- Ecological surveys of key areas of habitat, habitat connectivity mapping, species distribution mapping and ongoing monitoring and public reporting of biodiversity.
- Mechanisms for conservation covenants on rural lands.
- Additional incentives for on-ground works and measures.

The Draft NRM Plan should specify that the ACT Conservator of Flora and Fauna work with rural landholders, conservation and catchment groups to develop principles, guidelines and strategies to facilitate biodiversity conservation on rural lands and off-reserve areas. Off-reserve management then needs to be supported through incentive schemes for actual, practical on-ground works.

Monitoring and Research

It is pleasing to see that the Draft NRM Plan acknowledges the contribution of research (including citizen science), and evidence-based approaches drawing on monitoring and evaluation of programs. Monitoring and evaluation assess how well on-ground programs are achieving objectives and conservation outcomes, but are rarely done consistently or well by land management authorities, and need adequate funding. Collection of baseline data through simple and straightforward surveys can be undertaken with the advice of experts and the assistance of community volunteers. Standardised monitoring methods enable comparison of different sites.

The NRM Plan should include a simple 'monitoring and reporting' system, using data from citizen science initiatives and more formal monitoring programs. The Biodiversity Research and Monitoring Program (BRAMP), a legislative requirement under the *Nature Conservation Act 2014*,

⁵ ACT Auditor-General's Report *Land Management Agreements*. Report No. 1/2021.

and the Conservation Effectiveness Monitoring Program (CEMP)⁶ could develop into useful programs, but both still appear to be in their conceptual phase and not reporting understandable data.

Offsets areas under management

The Draft NRM Plan (p.35) notes that the amount of land now managed through offsets programs has increased significantly since 2009, but that it has not been possible to assess whether offsets for land development have ensured no net loss of biodiversity (p.80). Arguably, this suggests that the current environmental offsets policies and arrangements which enable clearing of woodlands and grasslands for development are not effective, and should be re-assessed.

Summary

In summary, COG considers the NRM Plan should explicitly acknowledge and include:

- The need for a landscape or ecosystem approach, especially for ACT rural lands, and covering all tenures.
- A reference to 'Unnatural Fragmentation of Habitats' as a Key Threatening Process under the *Nature Conservation Act 2014 (ACT)*, and the 'Loss of Mature Native Trees' Conservation Advice under this Act.
- A comprehensive package of measures, covering practical on-ground works and programs, to ensure biodiversity protection and enhancement on rural lands, including for woodland birds.
- Practical and simple biodiversity monitoring and data that is publicly available, which draws on community-based and citizen-based monitoring data.
- The need for a full assessment of the effectiveness of environmental offsets programs.

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Yours sincerely



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⁶ [Conservation Effectiveness Monitoring Program - Environment, Planning and Sustainable Development Directorate - Environment \(act.gov.au\)](https://www.environment.act.gov.au/conservation-effectiveness-monitoring-program)