



Friends of Grasslands

supporting native grassy ecosystems

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Chief Minister,

Treasury and Economic Development Directorate

By email: BudgetConsultation@act.gov.au

Dear Chief Minister,

Re: FY25 ACT budget submission concerning the natural environment

We write with this budget submission to focus on the longer-term expenditure and revenue priorities concerning conservation of the natural environment for the Government.

Our submission argues that by modestly increasing the nature conservation budget that your government can better support the wellbeing of the Canberra community in three key ways, namely:

1. Improving the quality of the environment that distinguishes Canberra as the bush capital and a good place to live;
2. Reducing costs to the community through early action to address looming problems and to reduce longer term management costs; and
3. Identifying and conserving lands of high conservation value so as to steer development to uncontroversial lands where development may be expedited.

Introduction:

Friends of Grasslands (FOG) is a community group dedicated to the conservation of natural temperate grassy ecosystems in south-eastern Australia. FOG advocates, educates and advises on matters to do with the conservation of native grassy ecosystems, and carries out surveys and other on-ground work. FOG is based in Canberra and its members include professional scientists, landowners, land managers and interested members of the public.

Among other activities, FOG is the lead community organisation partner for the ACT Government in managing high conservation value ACT lands at sites that include Budjan Galindji Reserve in Franklin, Blue Gum Point in Yarralumla, and Hall Cemetery. In other words, our advocacy is informed by our sweat on the ground, working shoulder to shoulder with ACT Government staff to conserve the ACT's environment.

Our submission focusses on FOG's mission of conservation of native temperate grasslands and grassy woodlands. Conservation of these ecosystems is a particular challenge because they are listed as critically endangered and also contain a multiplicity of threatened flora and fauna species under ACT and Commonwealth law, and because Canberra is built on these ecosystems. Consequently, measures in the budget to strategically conserve grassy ecosystems present opportunities for the ACT Government to both better conserve the environment and deconflict broader development decisions in Canberra. Due to the knowledge, resources and integrated nature of the community and government in the ACT, we have the opportunity to set the standard for conservation and sustainable development in Australia.

FOG is a member of the Conservation Council ACT Region. We support their broader budget submission. Here we elaborate on a smaller number of measures needed to enhance grassy ecosystems, taking into account the key benefits outlined above:

Proposed budget measures:

We ask for investment in the following measures:

1. Improving the quality of the environment

Even with over half the lands (55.9%) in the ACT in designated protected areas, it is insufficient to conserve those elements of biodiversity that occur within the lower altitudes, where there is significant conflict with urban and economic development. The land reserved for nature conservation has historically been on the rocky, higher hills and mountains that are impractical for other land and economic uses. While the Government has more recently added areas of lowland woodland and grasslands to the reserve system, the most threatened and insufficiently conserved ecosystems and species lie in the flatter lands where Canberra is located. The big gains for both improving conservation of biodiversity and facilitating sustainable development will come from deconflicting land use in the Canberra urban area and adjacent lands earmarked for future development.

1.1 Establishing and implementing a biodiversity network. City Services, Environment, Planning. Cost: modest.

The health of flora and fauna populations and the 'bush capital' nature of our city depends on having corridors linking bushland habitats, regardless of land tenure. The ACT Government has made some welcome initiatives to conserve and protect such corridors in 2023, including the blue-green corridors designated in the planning reforms, and the Connecting Nature, Connecting People initiative. The Conservation Council and FOG have proposed designation of a formal 'biodiversity network' to identify, protect, and restore and maintain key existing remnants for biodiversity and amenity while retaining complementary uses where possible. Most of these high conservation areas have no substantial legal protection. Other areas of land along linking corridors are little more than monocultures of weed grasses that are managed by mowing. Habitat needs to be ecologically restored and maintained. We now ask the ACT Government to fund specific elements of the biodiversity network:

- a) A program to protect through legislation the existing remnants of high conservation value, as well as designating key corridors across land tenures to establish the 'biodiversity network' (or similar). Overlay zoning in the Territory Plan is one mechanism to establish these corridors;
- b) Management agreements with agencies and rural and urban lessees to conserve key lands outside Canberra Nature Park;
- c) Funding to restore and maintain native vegetation and other natural features (e.g. wildlife passes, log habitats) in the remnants and along the corridors;
- d) Additional ranger staff and ecologists to manage these unleased lands and to provide ecological management advice and support to land managed outside the reserve system.

1.2 Reserving high conservation value urban park land: City Services, Environment. Cost: low.

Sadly, a number of areas of high conservation value land have no substantial legal protection and limited active management as informal urban parks land managed by City Services. We ask the ACT Government to undertake a process for identifying such lands and formally designating them as part of Canberra Nature Park and managed by ACT Parks and Conservation. Among the lands that should be designated are Ainslie Volcanics, Ainslie; Black Street grassland and Blue Gum Point, Yarralumla; and Flea Bog Flat, Bruce. These are already ACT lands that should be managed well. A modest investment

may be required to upgrade weed monitoring and control, fences and signage, but the cost will be very low.

1.3 Implementing management agreements on leased land. Environment. Cost: modest.

Many high conservation lands are managed as leases, primarily on rural land, but also on some urban blocks. In the case of conservation of grassland flora and fauna, the survival of many species depends on managing grass biomass so there is not too little and not so much that it smothers the micro-habitat of other wildflower and animal species. Private lease managers are often in the best position to use livestock grazing and fire to keep the grasslands just right. More management agreements are needed to support leaseholders. Incentives are needed for participating leaseholders to enter into such agreements. These could include: access to grants for additional weed control, fencing and erosion control; rate rebates; or other technical assistance.

1.4 Implementing the review of the Nature Conservation Act 2014. Environment. Cost: high.

The ACT Nature Conservation Act 2014 is being reviewed. It has served the ACT well but is now dated and in need of a significant upgrade. Substantial funding should be earmarked to implement change to support the reforms to better conserve biodiversity on and off-reserve.

One necessary reform is the need to provide for the secure legal protection of high conservation value biodiversity on leased lands. If the biodiversity network vision is to be realised, this change is needed to bring land that is not public land into the ACT's protected area system.

1.5 Support the 2024 Commonwealth FY24-28 NRM program. Environment, City Service. Cost: modest

Provide additional support to facilitate better management outcomes on grasslands and woodlands to complement the actions being undertaken under the NRM program including along corridors between remnants. Provision of stewardship payments to lessees to undertake additional requirements to retain biodiverse areas.

1.6 Upgrading the Urban Parks and Places volunteer support. City Services. Cost: modest.

Volunteers play a growing role in managing and enhancing Canberra's urban parks, dedicating time and knowledge that government agencies cannot afford. Their activities include restoring, maintaining, and managing the biodiversity on public lands. City Services have an Urban Parks and Places (UPP) program that until recently had one or two volunteer coordinators supporting around 90 community groups undertaking volunteer work to manage and enhance urban parks. By comparison, the Parks and Conservation Service have two staff plus local rangers supporting their ParkCare program with 26 groups. There is an urgent need to fill the vacant positions and appoint additional volunteer coordinators to better support our Canberra community to care for our public lands. The urban parks groups are also in need of an ecologist to provide them with technical advice for environmental restoration activities.

1.7 More securely fund ACT Catchment Management Groups (CMGs). Environment. Cost: modest.

The three ACT CMGs support hundreds of volunteers who work across Canberra to help restore, maintain, and manage the environment. They need better and more secure funding to support government programs and maximize community involvement in environmental management.

2. Reducing costs to the community

There are a number of measures that involve some upfront expenditure but which may significantly reduce costs of managing the environment and enhance community wellbeing in the longer term.

2.1 Renew and enhance the ACT biosecurity program. Environment. Cost: modest.

The ACT is under constant threat from exotic pest animals and weeds. Failure to identify and eradicate incursions of invasive species in the past now costs our society dearly. For example, African Lovegrass was not controlled when it entered the ACT late last century and now greatly exacerbates bush fire risk, diminishes primary production, and will fundamentally and irreparably degrade our local ecosystems if not addressed. Four years ago, the ACT established a biosecurity program with additional resources, including six staff. This program has successfully eradicated numerous incursions of dangerous new weed species, including Coolatai Grass and Madagascan Fireweed, and helped control sleeper weeds in the ACT. The unit introduced the use of ArcGIS/Field Maps for government staff, contractors and volunteers to map weed incursions and record management efforts. The team leader, Steve Taylor won a national award last year for his innovative use of the platform to manage invasive plants in the ACT. The funding for this work expires in FY24. It is inconceivable that the ACT Government would not maintain this biosecurity capacity. It is crucial that funding is renewed on a recurrent basis.

2.2 Pilot program to replace exotic grasslands. City Services, Environment. Cost: low.

Thousands of hectares of urban open space in Canberra are grassland. Much of this land is dominated by exotic weeds like the highly invasive African Lovegrass and Chilean Needlegrass. City Services manage 5,227 hectares of this land by mowing. There are many negative impacts. Mowers are particularly polluting and also spread weed seeds exacerbating loss of native biodiversity. Regular and ill-timed mowing can reduce biodiversity by minimising regeneration opportunities and slashed material may create mulch that kills native understorey, plants, ultimately leading to replacement by invasive species. Mowing also throws fine grass cuttings onto surfaces where they are washed into waterways, exacerbating the nutrient influx into urban lakes and subsequent cyanobacteria blooms. Mown grasslands are hot and exacerbate the urban heat island effect. It costs the ACT Government a lot to mow this land.

We ask the government to start a pilot program to test ideas for cost effective ways of restoring exotic grass infested urban open space to native vegetation that does not requires substantially less maintenance. There are good examples in Canberra, such as the native grasses planted along the light rail corridor, and the wildflower meadows established at the entrances to ANU. It is time to explore how to establish such native wildflower meadows as a cost-effective alternative.

2.3 Enhanced program to repair eroding public tracks and roads. City Services, Environment. Cost: modest

We ask for a modest program to systematically repair the management vehicle and walking tracks on public lands, including urban parks and Canberra Nature Park. Many of them have no drains and are eroding. Poorly managed tracks spread weed seeds and exacerbate invasion of run-on areas. The run-off from sediment, biomass and nutrients into waterways is a root cause of cyanobacteria blooms in Canberra's lakes. Further, there are many public roads with no curbs and unsealed car parks that are badly eroding. The fixes are simple, e.g. installing roll over drainage, sealing car parks, and repairing fences (to limit off-road driving, parking, and cycling). The work can be undertaken by many local contractors. There is the potential to link such programs to job training for disadvantaged young school leavers.

3. Identifying lands for conservation vs development

The time taken for development approvals in Canberra is often exacerbated because high conservation value lands are not clearly identified upfront to enable developers to focus on unconflicted lands. A proactive program to identify land for conservation and development could provide greater certainty for all stakeholders. The strategic environment assessments undertaken in the ACT under the Commonwealth EPBC Act were successful in resolving land use and speeding approvals for urban development at Ginninderry and Gungahlin.

EPBC Act reform processes underway right now indicate the ACT Government could in future make a regional plan(s) for the ACT identifying a 'Conservation Zone(s)' and a 'Development Zone(s)'. The draft standard suggests that Conservation Zones will likely include:

- the ACT's protected areas;
- areas already providing conservation benefits, i.e., 'other effective area-based conservation measures' (OECMs) that are expected to span multiple land tenures;
- degraded areas with a potential for rehabilitation and even restoration to ecological health – it is the protection and management of these areas that could contribute to the regional plan's achievement of nature positive outcomes.

Further, the Federal Parliament has adopted a Nature Repair Act that authorises the establishment of a market for tradeable biodiversity certificates. This market may channel resources to conserve grassy ecosystems on privately managed lands, including leased lands. Were the ACT to proactively identify high conservation lands outside of reserves, it would be well placed to access the new market.

The measures outlined above in 1.1 to 1.3 would contribute to better conservation and development deconfliction. We suggest additional measures:

3.1 Map critical habitat for threatened species: Environment. Cost: modest.

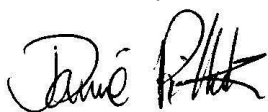
We ask the ACT Government to formally map and designate critical habitat for all listed threatened species under the Nature Conservation Act. These maps would define the land areas needed to conserve the threatened species. The maps would help developers avoid the critical habitats and focus conservation programs. They could help prioritise land for biodiversity stewardship payments.

3.2 Strategic environmental assessments: Environment, Planning. Cost: modest.

The ACT Government is considering what kinds of developments could be considered in the 'western edge' and 'Eastern broadacre' regions. There are particularly high conservation value grassy ecosystem habitats in the Eastern Broadacre region. We recommend that the government undertake strategic environment assessments of both regions now so as to identify and reserve high conservation value lands, as well as those areas that may be suitable for development.

We would welcome opportunities to work further with you and your ACT Government staff to elaborate and further advance the measures proposed above.

Yours sincerely,



Professor Jamie Pittock
President, Friends of Grasslands
11th March 2024