



COMMISSIONER  
FOR SUSTAINABILITY  
AND THE  
ENVIRONMENT

Conservation Research Section  
Environment, Planning and  
Sustainable Development Directorate

To Whom it May Concern

Thank you for the opportunity to provide a submission in response to the *Draft ACT Native Grassland Conservation Strategy and Action Plans*.

The *Draft ACT Native Grassland Conservation Strategy* is an important document which guides the conservation and management of ACT native grasslands and their resident species. To relate this work to an international scale, this strategy contributes to the delivery of the United Nation's Sustainable Development Goal 15:

*“Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss”.*<sup>1</sup>

*ACT State of the Environment Report 2015*

Our office published the latest [ACT State of the Environment Report in 2015](#). This report outlined that Natural Temperate Grassland (NTG) in the ACT is highly fragmented and has been reduced from 11% to 1% of the ACT.



The *ACT State of the Environment Report 2015* outlined trends for listed threatened species in the ACT and all of those in grassland habitat were either declining or the trend was unclear. This highlights the need for further research and monitoring of these species. One of the relevant recommendations from the report is:

Recommendation 8 – Biodiversity: that the ACT Government provides the necessary resources to complete the next phases of the Conservation Effectiveness Monitoring Program (CEMP).<sup>2</sup>

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<sup>1</sup> United Nations 2015, *Resolution adopted by the General Assembly on 25 September 2015 – Transforming our world: the 2030 Agenda for Sustainable Development*, Seventieth session, Agenda items 15 and 16.

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*This Office is independent of, but funded by, the ACT Government.*



The Government supported this recommendation<sup>3</sup> and the CEMP will focus on eight priority ecosystems, of which lowland native grasslands is one. The Grassland Enhancement Program (2016-18), established to assess the effectiveness of mosaic burning and grazing techniques, is an essential part of this program. The CEMP is vital to the ongoing management of these priority ecosystems, including native grasslands and its continued funding is required in order for this to be realised.

**Recommendation 1** – Continue funding for the CEMP in order to ensure appropriate systems are in place to compile, analyse and report on monitoring data to inform reserve management for priority ecosystems.

### Community Engagement

The strategy for community engagement overall is good, however it is not clear how this part of the project is to be funded. Community engagement with native grasslands in the ACT to date has been piecemeal and therefore it represents an opportunity for improvement. It is important that it has adequate funding in order to achieve the following recommendations:

**Recommendation 2** – Develop a Community Engagement Action Plan (include staff and funding required to undertake this action).

**Recommendation 3** – Implement the Community Engagement Action Plan.

**Recommendation 4** – Use Facebook and Twitter to promote the value of grasslands and encourage the community to use apps like Canberra Nature Map to record grassland species.

**Recommendation 5** – Improve signage in the grassland reserves.

**Recommendation 6** – Consider other community engagement activities such as Greening Australia’s ‘Landcare for Singles’ or Keep Australia Beautiful’s ‘Adopt a patch’ program for organisations and corporations.

**Recommendation 7** - Ensure that indigenous staff members are engaged in management of the grasslands (particularly for cultural burns).

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<sup>2</sup> Office of the Commissioner for Sustainability and the Environment 2015, *ACT State of the Environment Report 2015*, OCSE, Canberra.

<sup>3</sup> ACT Government 2015, *Government Response to the State of the Environment Report 2015*, [http://www.environmentcommissioner.act.gov.au/\\_data/assets/pdf\\_file/0005/1039379/201606-Government-Response-to-the-State-of-the-Environment-Report-2015.pdf](http://www.environmentcommissioner.act.gov.au/_data/assets/pdf_file/0005/1039379/201606-Government-Response-to-the-State-of-the-Environment-Report-2015.pdf) accessed 11 May 2017.

**Recommendation 8** – Pursue opportunities to partner with a range of organisations to engage communities in traditional and more alternative ways, e.g. art in the grasslands.<sup>4</sup>

*Condition of selected Natural Temperate Grassland sites in urban and peri-urban Canberra, by Ken Hodgkinson*<sup>5</sup>

This report was commissioned by our office and fed into the *ACT State of the Environment Report 2015*. The report was provided to the Environment Planning and Sustainable Development Directorate (EPSDD) for their information.

*Note - there is currently no reference to this report in the Draft ACT Native Grassland Strategy and our office believes this omission should be rectified.*

The *Hodgkinson* report introduces NTG as one of the most threatened plant communities in Australia.

It is important to note that the *Hodgkinson* report only outlines the floristic values of selected grasslands in the ACT and does not include the management requirements for threatened fauna. The current approach for management of threatened species has a particular focus on their habitat in the grassland.

*Hodgkinson* emphasized that current management of NTG sites will not ensure their survival. NTG sites are remnants and are at sub-marginal levels in the ACT. The threats outlined in the report include:

1. Overgrazing by kangaroos, animal pests and domestic herbivores – the continuation of grazing in urban and peri-urban Canberra by domestic stock and large populations of kangaroos is not supported as sites where grazing occurred had very low floristic values.

In response to this observation and following discussions with Conservation Research, EPSDD, this Office would add that grazing pressure becomes more serious in drought conditions, while during wetter periods, under-grazing is also an important consideration.

Some research has been done on the influence of the climate on grassland condition but there are a series of complex interactions that occur in the

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<sup>4</sup> Reid, K. 2015, *Working together – grassland management in the community*, Chapter in *Land of Sweeping plains – managing and restoring the native grasslands of south-eastern Australia*, edited by Williams, N., Marshall, A. and Morgan, J., CSIRO Publishing, Victoria.

<sup>5</sup> Hodgkinson, K. 2014, *Condition of selected Natural Temperate Grassland sites in urban and peri-urban Canberra*, Final Report to the Commissioner for Sustainability and the Environment, ACT, [http://www.envcomm.act.gov.au/data/assets/pdf\\_file/0009/661608/Final-report-edited-on-a-subset-of-14-natural-temperate-grassland-sites-in-urban-and-peri-urban-Canberra.pdf](http://www.envcomm.act.gov.au/data/assets/pdf_file/0009/661608/Final-report-edited-on-a-subset-of-14-natural-temperate-grassland-sites-in-urban-and-peri-urban-Canberra.pdf), accessed 10 May 2017.

ecosystem and it is very difficult to separate these issues to understand the patterns that are occurring.

2. Excessive and untimely mowing regimes.
3. Failure to eradicate weeds – a person knowledgeable in weed management should be managing weeds in NTG sites.
4. Failure to apply fire regimes essential for the survival of most of the native plant species – burning is essential to maintain native plant species but further research is required to find the preferred fire regime.

In response to this, this office would recommend that fire management in grasslands is further explored.

Currently, it is unclear as to which time of year is most suitable for burning to be undertaken. In addition, each site is different in terms of its management requirements, so burning options should be determined on a site-by-site basis. In order to ensure management is site specific and able to be tracked, each NTG site should have a management plan.

*Hodgkinson* also recommended that Category 1 and 2 grasslands should be maintained and Category 3 grasslands should be rehabilitated.

The *Draft ACT Native Grassland Strategy* currently does not have any reference to Category 3 grasslands and mentions that restoration of grasslands is very difficult, costly and can take years to have an effect. This is understandable but degradation of the grasslands is inevitable, especially with uncertainty in the face of our changing climate and rehabilitation options could still be explored, particularly as a collaborative effort with the community.

**Recommendation 9** – Ensure management of NTG sites takes into consideration the threats outlined above (grazing, mowing, weeds, lack of fire).

**Recommendation 10** – Maintain Category 1 and 2 Grasslands and rehabilitate Category 3.

#### *General comments on the Draft ACT Native Grassland Conservation Strategy*

The *Draft ACT Native Grassland Conservation Strategy* is a thorough document, however, Part A: Conservation Strategy is lengthy and could be reduced.

Previously, the ACT definition for NTG as an endangered ecological community only considered grassland below 625m, whereas the EPBC Act considers grassland up to 1200m.<sup>6</sup> Definitions for NTG for ACT and Australian legislation are now aligned in this Strategy

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<sup>6</sup> Office of the Commissioner for Sustainability and the Environment 2015, *ACT State of the Environment Report 2015*, OCSE, Canberra.

(includes grassland up to 1200m). This is a *positive step* as it will allow consistent management of NTG according to state and federal requirements.

The Pink-tailed Worm-lizard is reported in both woodland and grassland, so the action plan for the species has been put in a separate document, rather than included in the *Draft ACT Native Grassland Conservation Strategy*.

This seems inconsistent with the Pink-tailed Worm-lizard Action Plan which observes that the most suitable habitat for the species is NTG.

As such it seems logical that it be included in this grassland strategy.<sup>7</sup>

**Recommendation 11** – Include the Pink-tailed Worm-lizard in the *Draft ACT Native Grassland Conservation Strategy*.

**Recommendation 12** – Order the guidelines for management of each species in the priority management order in which they are listed (p. 17).

Finally, under the *Nature Conservation Act 2014*, climate change is required to be considered in the development of action plans for threatened species and ecological communities.

This being the case, it is necessary to address the omission of climate change in the action plans for Baeuerlen's Gentian, Ginninderra Peppercreese or Striped Legless Lizard.

**Recommendation 13** – Ensure the impacts of climate change have been considered in each threatened species action plan under the *Draft ACT Native Grassland Conservation Strategy*.

My office is happy to be contacted for further clarification if required.

Yours sincerely



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Commissioner for Sustainability and the Environment

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<sup>7</sup> ACT Government 2016, Draft Action Plan Pink-Tailed Worm-Lizard *Aprasia parapulchella*, <http://www.legislation.act.gov.au/ni/2016-577/20161025-64943/pdf/2016-577.pdf>, accessed 9 May 2017.