

# STEP Inc

Community-based Environmental Conservation since 1978

Director General  
Attention: Draft NSW Biodiversity Strategy 2010-2015 Comments  
Department of Environment, Climate Change and Water  
PO Box A290  
Sydney South NSW 1232

6 February 2011

## **Re: Draft NSW Biodiversity Strategy 2010-2015**

STEP Inc is the largest community based environmental group on Sydney's North Shore, with over 400 members. Our aim is to preserve natural bushland and to protect biodiversity for the enjoyment of future generations.

Basic to our approach is the need to put the required planning to achieve these aims into a long-term time frame. Our comments below are made with these aims in mind.

### **General comments**

Generally an excellent document based on extensive and sound research. It is pleasing to see a whole of state view with priority areas separated from 'scenic values' so long used to reserve areas for biodiversity management.

There are a few places where the language could be less ambiguous/ stronger, for example p15, "Address priority barriers to fish passage in each CMA". The word 'address' should be replaced by 'remove'.

For the sake of consistency and to greatly increase the value of this document as an educational tool, Section B would be improved if all ecosystems were described with the same format.

- 1 General description
- 2 Priority areas
- 3 Where are the priority areas?
- 4 Who is managing the priority areas?
- 5 What are the threats to the areas?

### **A. Comments on specific views requested in the submission details**

1. At this stage of biodiversity of conservation in NSW; the themes, objectives, targets and actions are appropriate.

2. The contribution the Strategy could make to building partnerships with private landholders or producers may be appropriate at this stage but there are problems that need to be addressed, either now or in the next strategy (2015-2020). They are:

- 1 Current complexity of private conservation in NSW, especially for long-term conservation. This requires simplification (see below)
- 2 A shortage of extension staff skilled in the conservation of biodiversity but who can

also communicate effectively with the rural community (see below)

3. The document provides **limited** understanding to all New South Welshmen of a method to contribute to the biodiversity of NSW as the Strategy is targeted at priority areas. The selection of these areas is sensible but it does disengage most of the population as the vast majority does not live near any of these areas. Perhaps a short section in Part A acknowledging the importance for the conservation of biodiversity in **existing reserves and of bush regeneration/restoration programs** would partly overcome this problem.

4. The state scale priorities are very useful for directing investment in time, energy and money into poorly conserved ecosystems.

5. The reporting, as listed in the Strategy, is comprehensive and adequate for **planning** but this reporting will not engage individuals only marginally interested in biodiversity conservation. A mechanism to report through Local Councils to their rate payers would greatly assist the dissemination of biodiversity information to the **general community**.

## Part A

### 1. Future directions

We suggest the addition of a separate section in Part A - to be inserted after "Themes, objectives, targets and actions" and before 'Objective 1' and titled '**Future Directions**'

### 2. Landscape movement routes

It is pleasing to see the emphasis on landscape movement routes but this document is still very limited as it emphasises the Great Eastern Range Initiative and reserving (in some manner) Priority Areas. The selection of Priority Areas includes 'sites that are well connected with surrounding landscape' (p22) but there seems to be no plan as to how to maintain the connections.

#### Future direction

"To maintain, extend and restore a web of landscape movement routes across the state"

### 3. Planning

While this document obviously emphasises conservation of biodiversity much of the planning in the state is not so sympathetic, for example 'Part 3A', 'National Parks and Wildlife Service Cycling Policy Review and Sustainable Mountain biking Strategy', 'National Parks and Wildlife Amendment (Visitors and Tourists) bill 2010, various provisions for mining and forestry and recreational hunting.

#### Future direction

"To ensure planning in New South Wales treats biodiversity conservation as top priority"

### 4. Extension officers

An enormous amount of well-directed research has gone into this document but the next stage needs to be communication with owners of the 73% the state managed for primary production purposes. This would be best done with staff trained in **agriculture and restoration ecology**, not just environmental or natural resource management. This could easily be done through the current CMA structure or the Department of Industry and Investment

#### Future direction

"To employ extension officers skilled in **agricultural production**, restoration ecology and

natural resource management so as to encourage conservation of biodiversity on private land”

## 5. Threats

Threats to the biodiversity of New South Wales are generally well addressed but microorganisms have not received enough attention. There is no use fencing an area against phytophthora or myrtle rust

### **Future direction**

‘To **urgently** develop a feral cat TAP’

‘To liaise with AQUIS to increase protection against pests and pathogens’

‘To increase research into the control of pathogens that threatens biodiversity’

‘To improve procedures to prevent spread of pathogens that threatens biodiversity’

## 6. Incentives and prosecutions

While there are numerous existing mechanisms to conserve biodiversity on private land the procedures that provide for long-term conservation are complex. There is also no point in having strong legislation, e.g. the Native Vegetation Conservation Act and the Threatened species Act unless prosecutions take place and are successful.

### **Future direction**

“To simplify mechanisms to permanently conserve biodiversity on private land”

“To actively prosecute infringements of the Native Vegetation Conservation Act and the Threatened species Act”

## 7. Detail

The broad brush approach of this document is suitable for 2010-2015 but conservation of biodiversity in the state will falter unless subsequent strategies address specific issues in more detail, for example the development and maintenance of landscape movement routes and the survey for/of threatened species.

### **Future direction**

“To plan a detailed web of landscape movement routes across the state”

“To plan for the conservation of threatened species and ecosystems at a regional and then local scale”

“To conserve currently common ecosystems so that they do not become threatened”

## **Part B**

### **State ecosystem profiles and priorities**

#### 1. Inconsistent structure

Some ecosystem chapters feature a subsection headed "What are the threats....." but many do not. Not sure why the inconsistency. Surely threats should always be highlighted consistently for every ecosystem.

#### 2. Freshwater wetlands (p59)

Would like to see specific emphasis on the upland swamps of the sandstone tablelands of Sydney's water catchments because they are vital to future water supplies and will never be free of threat from underground coal mining. They are mentioned in the opening paragraphs on p59 but they are not highlighted further.

#### 3. Rivers (p63)

Under "threats" mention should be made of exotic plants. These range from weeds on

margins such as willows, pineapple weed, taro etc. to aquatics like alligator weed and salvinia. Also the changes in pH and other aspects of chemistry through urbanisation of catchments have profound effect on life from invertebrates upwards, and increased nutrient levels favour algal growth with blooms and eutrophication of stagnant reaches.

#### 4. Estuaries and coastal lakes (p66)

It isn't clear whether "changing land-use" acknowledges increased siltation and freshwater flooding from urbanisation of catchments, notably in the metropolitan area. This is favouring expansion of mangroves at the expense of salt marsh and sea grass, and encroachment of freshwater semi-aquatics into saline environments.

#### 5. Marine waters. (p69)

Under "what are the threats..." needs an acknowledgment of risk from invasive species e.g. the seaweed *Caulerpa taxifolia* and Pacific oysters.

Yours sincerely.

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