

# Submission to the ACT Government on the *Draft Nature Conservation Strategy 2026-2036*, from Plant Conservation Australia

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Plant Conservation Australia welcomes the opportunity to provide a submission on the *ACT Government Draft Nature Conservation Strategy (2026-2036)*.

## **About Plant Conservation Australia.**

*Plant Conservation Australia (PCA)* was founded in 1991, and was until recently known as the *Australian Network for Plant Conservation (ANPC)*. Our mission is to promote and develop native plant and ecosystem conservation practice in Australia.

Plant Conservation Australia is an association of people and organisations dedicated to the conservation of Australia's native plant species and vegetation communities, which are part of our living national heritage and underpin the health and productivity of our continent. We are a national not-for-profit, non-government organization incorporated in the ACT, and are on the Commonwealth Register of Environmental Organisations, with Deductible Gift Recipient and Charity Concessions status with the Australian Taxation Office.

PCA has 34 years of experience in the development of national technical guidelines for native plant conservation, and in the delivery of targeted training and knowledge exchange, through effectively involving experts and stakeholders across jurisdictional, disciplinary, and organisational boundaries.

## **What we like about the Draft Strategy:**

We welcome the release of this Strategy and also commend the significant work that has gone into its development. We are particularly excited about the cross-tenure approach and the preference towards protecting threatened plant and animal habitat rather than using offsets. The Nature Positive ethos, where nature is not just protected from loss, but is demonstrably improved is, we believe, a welcome addition. On the whole we believe the Strategy covers the key elements needed for effective conservation of plants and vegetation communities within the ACT.

The embedding of recognition of the Ngunnawal people as key custodians, and respect for their intricate knowledge of indigenous plants and natural systems is also a welcome part of the strategy. We appreciate that there are specific targets in relation to Ngunnawal led cultural burns and support the development of access protocols to enable Ngunnawal to visit cultural sites and undertake cultural practices on lands managed by PCS.

We also welcome the proposed establishment of Priority Conservation Areas, and their consideration in establishing an ACT Urban Growth Boundary, which we are hoping will protect threatened species habitat, particularly on Canberra's Western Edge Investigation Area, which according to the ACT State of the Environment Report (2023) contains:

*“Plant community types:*

- *an estimated 210 ha of EPBC Act / Nature Conservation Act 2014 listed natural temperate grassland (critically endangered)*
- *an estimated 1916 ha of Nature Conservation Act 2014 listed Box-Gum woodland (critically endangered)*
- *47 ‘rare and uncommon’ flora species including substantial patches of vegetation dominated by either Drooping Sheoak (*Allocasuarina verticillata*), Black Cypress Pine (*Callitris endlicheri*) or Fern species.”*

Lastly, we appreciate the focus of the Strategy on climate adaptation, as this will increasingly be important work to help build resilience of threatened plant species and ecological communities to climate change, and particularly in the altered fire regimes under future climate scenarios. According to the SoE report (2023), only 18% of assessed native vegetation was found to be within tolerable fire intervals. This is not sustainable for the survival of threatened plants and ecological communities.

### **Strategic targets:**

As all the listed strategic targets outlined are important and/or entail significant overlap, it is hard to prioritise one over the other. Having said that we are particularly concerned about on-ground implementation of the targets, so are particularly interested in the “Restoring nature and having funding to do it” target, as there is much on-ground work which needs to be done to hit a nature positive target of improvement for the outcomes of threatened plants and threatened ecological communities. For example, in the SoE Report (2023) under indicator B1, threatened species and ecological communities are listed as in poor condition and trending downward in the reporting period (2019-20 to 2022-23). To achieve the targets set out in the strategy, the condition of threatened species will need to improve, and this cannot be achieved without management intervention, through increased funding for restoration work, and for greater legislative protections from key threatening processes such as habitat fragmentation.

In relation to the achievability of targets with specific figures, taking target 12b as an example (ensuring at least 30% of ACT ecosystems are legally protected), it is unclear from the document what the current extent of ACT ecosystem protection is. If that is to be assessed as part of target 12a, whether this 30% is on top of the existing protection, or if that assessment produces a figure in excess of 30% there is no further action necessitated as per the strategy. Also the 30% figure does not seem to indicate the extent of the protection these 30% of ecosystems will be receiving. It would be helpful to have further clarity on this based on what is known currently. We are also concerned that the wording of target 19 (loss of PCA extent) is “near zero” and not a specific figure, this may leave it open to interpretation.

Target 18 (no new avoidable extinctions) has a deadline of 2036, which we see as too far down the road. This target should be immediate and ongoing, or at least as soon as a baseline has been established. We are in the middle of an extinction crisis – and should not accept further avoidable extinctions in both the short and long term. We would like to see the inclusion of a consideration of localised extinctions, as there are numerous species which are threatened within the ACT but also exist elsewhere (primarily rural NSW). These local populations may be reservoirs of important genetic differences, which may help buffer the species against the impact of future climate shifts or pest and disease incursions. They may also be key species to

ecosystem function and resilience. On local extinctions, we are also concerned about the definition of avoidable, as the Strategy states:

“some, unavoidably, will no longer have viable habitat in the ACT”

This phrasing provides a potential excuse for letting climate impacted species die out locally, particularly if there are populations elsewhere.

### **Our key concerns:**

On the Resist, Accept, Direct framework (Supplement A) we are concerned with how this lens may be applied to threatened plants in the face of a changing ecosystem. “Accept” and “Direct” actions are defined as allowing ecosystem composition and structure to “change autonomously” (“Accept”) or even “actively shape change” (“Direct”). Does this mean that there are instances where the most threatened native plants are deliberately abandoned in favour of species more adapted to the changing climate? We would hope that these instances be isolated and based on the best available impartial evidence.

The Draft Strategy mentions (on Page 4) about “payment of restoration contributions or other related financing mechanisms” to compensate for conservation values lost to development. We are concerned that these funding mechanisms may function in a similar way to what many offsets are often accused of, that they allow habitat destruction to occur for a fee. We would also appreciate more detail on where this funding would then go, how it would be used, and assurances that the value of these are in keeping with the Nature Positive aims of the Strategy.

Target 11b (on pest incursions) introduces the concept of managing priority pests to “impact thresholds” of density and value impact, rather than aiming for complete eradication. How would these thresholds be determined? We are concerned that allowing for the incursion of certain priority plant pests which falls under these thresholds could prove disastrous for threatened flora, and that there would certainly be instances where total eradication of the pest is achievable and necessary.

Lastly the scale of urban growth compared to the modest connectivity targets in the Draft Strategy is of concern. On Page 3 it explicitly warns that Canberra needs to accommodate 100,000 additional dwellings by 2050. Despite this massive impending land use pressure, Target 20e only aims to “increase connectivity by at least 5% across ACT’s forests and by 10% across ACT’s woodlands”. We see this target as inadequate compared to the anticipated development and ask that it be independently reviewed in anticipation of being replaced by a more ambitious figure.

### **Recommendations for the implementation of the Strategy:**

- Regular public reporting on progress against the aims of the Strategy and instances where timelines are not being met.
- Consultation on the criteria for what constitutes a Priority Conservation Area once these are developed.
- Peer review of the Reference Ecosystem Benchmarks for PCTs mentioned in Supplement C, along with the ACT Recovery Wheel for monitoring ecological recovery.

- Substantially increased funding to enable full implementation of the Strategy and at the very least halt the current decline in threatened species outcomes.
- Review the forest and woodland connectivity targets set out in the Draft Strategy.
- Ongoing monitoring of threatened species populations against the no new extinctions target, including particularly those affected by the 2019/20 bushfires in Namadgi National Park and surrounds. Also a consideration of local extinctions and careful application of the term “unavoidable”.
- Offsets only be considered when no other option is available, and they are leveraged at substantially better than a ratio of 1:1 in terms of threatened species habitat (3:1 ideally). More detail provided on the financing mechanisms which may compensate for the loss of conservation values.

Thank you for the opportunity to comment on the Draft Plan.

Yours sincerely

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for **Plant Conservation Australia**

27 March 2026