

Native Vegetation Council

Consultation on native vegetation clearance applications

Submission form

You're invited to submit your views on applications to clear native vegetation.

Submissions will assist the Native Vegetation Council to make decisions about the removal and reestablishment of native vegetation in line with the *Native Vegetation Act 1991* and *Native Vegetation Regulations 2017*.

If you have any questions or require assistance completing this form, please contact the Native Vegetation Branch on (08) 8303 9777 or email nvc@sa.gov.au.

Name of clearance application that you are responding to:

Cadell Training Centre – Minister for Corrections

(31.74 hectares of proposed clearance across 10 sites plus 66 scattered trees)

Your details

Name	Julia Peacock
Organisation	The Nature Conservation Society of SA
Phone number	0400 277 423
Email	julia.peacock@ncssa.asn.au
Would you like your comments to be anonymous on the public record? All submissions will be provided in full to the Native Vegetation Assessment Panel for consideration. Copies of submissions may also be requested by the applicant and/or members of the public. Please select yes if you would like your comments to remain anonymous if a request is made.	Yes/No
Are you happy to be contacted by the Native Vegetation Branch to discuss your submission?	Yes/No
	Preferred time and method of contact Tuesdays and Thursdays, phone or email
Would you be interested in presenting your submission to the Native	Yes/No, if the NVAP thought it would be useful

Vegetation Assessment Panel if invited?	
Would you like to be notified of other consultations being run by the Native Vegetation Council? Tick yes to be added to our consultation e-newsletter distribution list.	Yes/No

Comments in response to application

**Please note: It is not compulsory to answer all of the questions. We recommend that you concentrate on the questions that you can confidently answer and leave the others blank.*

1. Please provide a brief summary of the main reasons you are making a submission.

The Nature Conservation Society of SA (NCSSA) is a community-based, not-for-profit organisation that, since 1962, has been a strong advocate for protection of native vegetation and biodiversity conservation in South Australia, with particular attention being paid to nationally and state listed threatened plants, animals and ecological communities and the management of protected areas.

In relation to this clearance application, NCSSA's comments are as follows:

- Permission cannot be granted under the *Native Vegetation Act 1991* to clear sites A1, B1, B2, C1 and E1 as these are substantially intact stratum (as stated on page 24 of the Data Report),
- Notably, the Fauna Report for the survey undertaken at site B2 strongly indicates that the area surveyed is of "conservation condition", and therefore it should not be cleared,
- In relation to scattered tree removal, photographs in the Data Report indicate that the land currently overgrazed and therefore significantly degraded. NCSSA contends that the remaining scattered trees are likely to be preventing significant soil erosion in this overgrazed area and therefore should not be removed (consistent with principle (h) of the Principles of Clearance).

NCSSA also does not agree with the assessment against the principles of clearance in relation to the following issues:

- The Data Report states that it is not at variance with the principle "it is growing in, or in association with, a wetland environment". However, the Fauna Report states "B2 is part of a continuous remnant of vegetation that transitions from an ancient river course wetland through the black box riparian zone."
- For the principle "it contains a high level of diversity of plant species", NCSSA questions how the use of 'amount of clearance related to remnant area' has been interpreted as a moderating factor.

Specifically, using 6900 ha as the “patch size” for changing “at variance” to “not at variance” does not seem accurate or biologically relevant. NCSSA understands that the “patch” being referred to is spread over an area of 15km by 15 km, or 276 km². The portion of vegetated area of 6,900 ha (or 69 km²) is only 25% of the actual land area and, over such a large area, cannot be considered one “patch”.

The local patch is more accurately the area of the Cadell Training Centre in which the clearing is proposed. In total, NatureMaps records about 120 ha of native vegetation in the immediate area of the application, of which 30 ha are proposed to be cleared. So the proposed clearance is 25% of the local patch, a significant reduction in land available for wildlife.

NCSSA has the following concerns with survey and reporting for this proposed clearance:

- The survey was undertaken in drought conditions which will lower the number of flora and fauna species visible significantly,
- The Fauna Report is restricted to only one, B2, of the nine designated clearance sites, and
- Areas A1, B1, B2, C1 and E1 should be considered as a contiguous unit and as such will have a higher flora species count than if considered separately: a total of 15 species rather than an individual high of 9 species.

NCSSA has the following concerns with the proposed Significant Environmental Benefit (SEB) offset:

- The proposed offset site is already protected under the NV Act,
- It is unclear what the proposed “significant environmental benefit” will be, since the proposed offset area is already fenced from stock,
- The proposed SEB area has apparently lost 13 species of perennial plants since a 1990 survey recorded on NatureMaps, which raises questions about the ability of the Cadell Training Centre to manage the proposed SEB area,
- The management plan for the proposed SEB does not contain concrete actions that will improve the area, and
- The proposed SEB, although large in size, is apparently very species poor. The current application report lists 28 species present in the proposed offset area. According to NatureMaps, the nearest Heritage Agreement (HA314) approximately 1.5 km to the south east has a species list of some 200+ species recorded.

2. Are there other sites available for carrying out the proposed activity that would result in no or less vegetation clearance and/or impacts on biodiversity? There may be alternative sites on property owned by the applicant, or the applicant could purchase or lease alternative land.

NCSSA suggests that, rather than increasing the horticultural and agricultural enterprises of the Cadell Training Centre, it firstly reduces the current stocking rate to a level that reflects sustainable land management practices.

Secondly, the Cadell Training Centre could add the TAFE course "Certificate III in Conservation and Land Management" to their program of vocational courses and actively engage their inmates in conservation practices including removing weeds, feral animals and overabundant kangaroos on all Cadell land.

Rather than seeking to clear vegetation, NCSSA suggests that the NVC could encourage the Cadell Training Centre to develop a management and action plan for all areas of native vegetation owned by the Prison system, which seeks to achieve demonstrable improvement at those sites.

3. How could the size, design or construction method of the proposed activity be changed to prevent or reduce impacts on biodiversity? This may include removing elements of the development that will have unacceptable impacts.

As per NCSSA's response to Question 2, we suggest pursuing establishing a Conservation and Land Management course rather than increasing horticultural and agricultural production at this site.

However, a specific concern we have with the proposal is that additional areas of almonds and olives will require large quantities of water, and we question whether sufficient licenses are available to support these activities.

We note that the exact plans are unclear, since almonds and olives are listed in the introduction but there is no reference elsewhere in the document to the area(s) to be cleared for these crops, other than noting that some sites are earmarked for clearing of the understorey only (so are presumably not proposed for horticulture).

4. What other actions could be undertaken by the applicant and its contractors during the construction and undertaking of the proposed activity to prevent or reduce impacts on biodiversity?

5. Are there any other measures that could be adopted by the applicant to prevent or reduce clearance of native vegetation and/or impacts on biodiversity?

See response to Question 2.

6. Has the applicant adequately demonstrated how they will undertake the ongoing monitoring and management of issues associated with the proposed

activity, such as weed and pest invasion? If not, what other actions should the applicant commit to?

7. Has the applicant adequately demonstrated that they can re-instate vegetation as much as possible through restoration activities once the proposed activity has ceased? If not, what other actions should the applicant commit to?

8. Are there other opportunities for delivering the required Significant Environmental Benefit offset (if applicable) that would produce better environmental outcomes?

NCSSA does not support the proposed offsetting arrangements for this clearance.

Firstly, the proposed offset site is already protected under the NV Act.

Secondly, there is no evidence that the vegetation is in a moderate condition and will be improved through the offsetting arrangement. Rather, the Data Report states that:

"The site has not been developed previously or affected significantly by direct human interference. The site is mostly undisturbed with historical clearing evident on the northern side of the site impacting stratum density and condition of the native vegetation present. The site was **fenced off from stock some years ago** (*emphasis added*) and the remainder of the property was leased to a grazer. As part of this project, the greater area will be excluded from stock in an effort to reduce impacts and enhance the native vegetation on the area adjacent the SEB site." (page 29)

It is therefore unclear what the "environmental benefit" to the proposed offset area will be, since stock have already been removed.

NCSSA notes that it is already a requirement of land management legislation and policies to undertake practices such as weed management and controlling feral animals such as goats (for example, see

https://pir.sa.gov.au/biosecurity/weeds_and_pest_animals/animal_pests_in_south_australia/established_pest_animals/feral_goats).

NCSSA also believes that the Native Vegetation Management Plan for the SEB area is inadequate, as it is too general and there are no detailed actions or timeframes specified in the plan.

We are also concerned that the Cadell Training Centre does not have a track record of managing native vegetation well. Rather, the photographs suggest that there has been significant loss of native vegetation from overgrazing, as evidenced by bare soil, little to no regeneration and low species counts.

9. Please provide any additional records or anecdotal evidence on the flora and fauna located in the clearance area that the Native Vegetation Assessment Panel should consider when reviewing the application.

NCSSA notes the following apparent errors in the Data Report which require review and/or correction:

- Difference in maths for proposed SEB required for scattered trees. Report 78.08 on page 28, NCSSA calculates 79.08
- The report does not include the current names for *Roepera* (syn *Zygophyllum*)
- Unclear as to why areas A1, B1, B2, C1 and E1 are separated when they are almost contiguous for the purposes of determining species lists (a total of 30 ha while the whole of the proposed SEB (at 250 ha) is in one list). The combined species list for the four areas proposed for clearance is 15 perennial species and the species richness is 31 bird species.

10. If you believe that clearance consent should not be granted, please outline your reasons and provide any additional information available to support your position.

NCSSA does not believe consent should be granted to clear intact stratum. Further, we do not believe consent should be granted to clear scattered trees in what appears to be an overgrazed landscape due to the risk of soil erosion.

The Data Report states sites F1, G1, H1, D1 and I1 (total of 2.949 ha) are not "intact stratum". Arguably, sites I1, F1 and G1 contain layers of strata that are still intact, however, if approval to clear these sites is granted, then the offset for these areas should be represent a gain **above and beyond** what is ordinarily required by relevant land management legislation and good grazing practice, and will need to be enforced to ensure compliance.

Declaration

x	I hereby certify that to the best of my knowledge the information provided in this submission is complete and correct and no information is false or misleading.
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Lodging your form

Send your completed submission to the Native Vegetation Branch via:

Email: nvc@sa.gov.au.

Post: GPO Box 1047 Adelaide SA 5001