



Blue Mountains Conservation Society Inc



Nature Conservation Saves for Tomorrow

Professor Hugh Durrant-Whyte
Commissioner
NSW Natural Resources Commission

Email: nrc@nrc.nsw.gov.au

27 April 2025

Submission: Protect and restore biodiversity and ecosystem functions in regional landscapes and enhance value and support for landholders

Dear Professor,

I am writing to you on behalf of the Blue Mountains Conservation Society. The Blue Mountains Conservation Society (the Society) is a community-based volunteer organisation with approximately 900 members. Our mission is to help protect, conserve and advocate for the natural environment of the Greater Blue Mountains. In fulfilling its mission, the Society advocates for the protection of the Greater Blue Mountains World Heritage Area.

The Society takes an interest in the conservation of indigenous flora, fauna and ecological communities located on private rural land (RU2 - Rural Landscape and RU4 - Primary Production Small Lots, Blue Mountains City Council Local Environment Plan 2015). In the Blue Mountains, this includes Moist Basalt Cap Forest, Megalong Granite Forest, Megalong Granite Dry Rainforest, Megalong Valley Bottlebrush *Callistemon megalongensis* (Critically Endangered Ecological Community), Blue Mountains Shale Cap Forest (Endangered Ecological Community), Blue Gum Riverflat Forest and Sun Valley Cabbage Gum Forest (Critically Endangered Ecological Community).

The Society is deeply concerned about the potential for and actual clearing of indigenous flora, indigenous ecological communities and the habitat of indigenous fauna on private rural land in NSW. The Society notes that the rate of private rural land clearing in NSW has increased alarmingly over the last decade.

Accordingly, the Society wishes to make a submission to the NSW Natural Resources Commission and its independent review examining options to further protect and restore biodiversity and overall ecosystem functioning on private rural land located in regional landscapes, and enhance value and support for landholders.

1. The Society endorses repeal of the Land Management (Native Vegetation) Code 2018 (*Local Land Services Act 2013* NSW). The Code enables private landowner self-assessment of proposed land clearing. Self-assessment has been an environmental catastrophe in NSW.

2. Instead, land clearing applications for both mature/old growth and regrowth indigenous vegetation should be subject to defined, ecologically detailed administrative approval processes.

The Society endorses appointment of an expert panel to assess clearing applications for mature/old growth indigenous vegetation located on private rural land. The expert panel should utilise conservation of indigenous flora and wildlife habitat as a high priority land clearing assessment criterion.

3. Proposed clearing of indigenous regrowth cleared prior to 1990 (currently exempt from any form of clearing regulation and assessment) should be subject to assessment by the expert panel. Recent research reveals that indigenous regrowth provides excellent habitat for many indigenous fauna species.

4. To restore indigenous biodiversity and allow landowners to maintain their livelihoods, the Society recommends that landowners be offered financial support and education in the environmental sciences, and sustainable and regenerative farming. At a time when climate change poses a serious threat to the sustainability of agriculture as well as to indigenous nature, the Society believes that informed, ecologically sensitive utilisation of indigenous ecosystems can only benefit the agriculture sector and practitioners.

5. The Society strongly supports significantly increasing the funding of the Biodiversity Conservation Trust (BCT). This will allow the Trust to expand its work, by connecting with private landowners and providing them with environmental education services and financial support, with the aim of restoring and conserving indigenous ecological communities and wildlife habitat on private rural land. To a considerable extent, the ecological and economic benefits (e.g. water conservation, indigenous vegetation conservation, eco-tourism, reduced soil erosion) that will arise from an increase in the number of BCT co-managed properties will offset the increased government financial outlay.

6. The Society supports significantly increasing the funding of regional Local Land Services (LLS) offices, to boost staff numbers and provide private, rural regional landowners with the support required to competently negotiate a new land clearing regulatory system, and sustainably manage both regrowth and mature indigenous vegetation communities and ecosystems.

7. Existing biodiversity values on private rural land holdings should be assessed, mapped and made available to landowners and the proposed expert land clearing assessment panel. This will help landowners to prepare ecologically accurate land clearing applications, avoid waste of time and money, and help to improve administrative communications between landowners, BCT and LLS staff, and the proposed expert land clearing assessment panel.

8. The Society supports government purchase of sensitive and/or rare vegetation communities and wildlife habitat from private rural landowners, preferably on a voluntary basis. In certain ecologically sensitive cases, and as a matter of last resort,

government should be empowered to compulsorily acquire private rural land for conservation purposes. Landowners should be justly financially compensated.

Thank you for taking the time to consider the Society's concerns and recommendations. I would be pleased to answer any further enquiries and may be contacted at my email address provided below.

Yours sincerely,

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Blue Mountains Conservation Society

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