

From: [REDACTED]
To: [NRC](#)
Subject: NRC submission regarding Restoring nature and enhancing value for landholders - Monaro Grasslands Reference Group
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Submission to the Natural Resources Commission regarding:

Restoring nature and enhancing value for landholders

Please accept the following as a submission from the Monaro Grasslands Reference Group.

Firstly we provide draft recommendations for the NRC to include in your report to government. The rationale follows below.

Draft Recommendations

1. That the draft maps remain in draft form until landholders have formally agreed OR the Secretary has ground truthed the holding and can demonstrate to the Ministers of Agriculture and Environment that the maps are 99% accurate on a region by region basis.
2. Retain the Local Land Services Act but further develop subsidiary instruments such as the Interim Grasslands and other Groundcover Assessment Method (IGGAM) to manage the process and restore trust between stakeholders.
3. Further develop stakeholder groups like the Monaro Grasslands Reference Group to inform the process going forward, formalise the structure of these groups under the subsidiary legislation and use such groups to produce guidance frameworks to assist the Secretary with key decision makings like map finalisation, stakeholder engagement and enforcement/prosecution processes.
4. Recognise the unique nature of invasive species like African lovegrass and Serrated Tussock and their threat to high value grasslands especially in light of the delisting of these weeds under the noxious weeds legislation.
5. Strive to gain recognition with LLS clearing approval processes and state and federal biosecurity legislation.
6. Use certified property maps as the basis for stewardship / value equity programs and recognise the financial and food security impacts on landholders of regulating land use.
7. Recognise the benefits that a robust and credible property vegetation map system can bring to third party market accreditation schemes and in enhancing the international standing of our primary production systems.

Rational

Draft maps

- Current maps are wildly inaccurate
- Landholders support the use of a map based system
- It is possible that remote sensing technology cannot ever be developed to the level required for use as a regulatory tool
- Landholders recognise the need for conservation on private land

Legislative structure

- LLS Act, while not perfect, is capable of delivering good conservation outcomes in it's current form
- With stakeholder input subsidiary instruments can be amended to achieve the triple bottom line objectives
- Trust has been badly eroded by the republishing of draft online maps without consultation, the current relationship between government and landholders is positive but fragile.
- Further support implementation of region specific tools, such as the Monaro Grasslands Code, within the LLS regulation which maintain the conservation assessment threshold principles and include provisions for broadacre control of highly invasive perennial weeds as a means to control or prevent infestation in privately managed grasslands.

Formalise Stakeholder groups

- Enhance existing good practice like the Monaro Grasslands Reference Group and the Monaro Grasslands Code by formalising roles and tasks
- Utilise such positive outputs to develop Guidance frameworks for use by the Secretary in key decision makings

Invasive weed species

- African Lovegrass and Serrated Tussock are key threatening agents to native grasslands and broader biodiversity
- The delisting under the Noxious Weeds legislation of these weeds is significant in future native grassland protection
- The current intervention level of 50% before clearing can occur is inadequate to control the spread of these weeds
- The 50% intervention level also provides a perverse incentive to stop controlling these weeds to allow them to reach the 50% threshold to then satisfy the clearing requirements

Biosecurity Legislation

- Landholders require certainty that LLS issued approvals will protect them from

prosecution from other state legislation.

- Guidance may be found in the Federal “Premises Standard” which gives protection to building owners in relation to meeting the disability access requirements for building works.

Stewardship Programs

- Formalised maps can be the basis of stewardship payments and be utilised as a reference standard rather than the current process of site by site evaluation.
- The loss of production capacity by regulating land use must be recognised in terms of financial cost and impacts on food security.

Third party benefits

- The emergence of supplier certification schemes around environmental credentials mean there are many other benefits from a credible mapping system.
- The opportunity presents at this time to enhance the international standing of our primary production systems if we can achieve robust, credible and transparent environmental mapping of our primary production lands. We cannot afford to lose this opportunity for the short term goal of political greenwashing.

Please direct enquiries to:

