



Blue Mountains Conservation Society Inc

ABN 38 686 119 087

PO Box 29 Wentworth Falls NSW 2782

Phone: 0490 419 779

E-Mail: bmcs@bluemountains.org.au Web Site: www.bluemountains.org.au

Nature Conservation Saves for Tomorrow

22 May 2024

Attention:

Dr Rosemary Dillon,
Chief Executive Officer,
Blue Mountains City Council
council@bmcc.nsw.gov.au

Dear Dr Dillon,

Submission: BMCC Draft Natural Areas Volunteer Program 2024-2029

The Blue Mountains Conservation Society (the Society) is a community-based volunteer organisation comprised of approximately 850 members. The Society's mission is to help protect, conserve and advocate for the natural environment of the Greater Blue Mountains.

The Society takes an interest in and promotes bushcare and environmental repair programs operating within the Blue Mountains Local Government Area.

Accordingly, the Society wishes to contribute a submission to BMCC's Natural Area Volunteer Program 2024-2029 (NAVP) review process.

The Society submits the following propositions and draft NAVP 2024-2029 amendments.

1. General principles and provisions

In general, the Society supports and endorses the Natural Area Volunteer Program 2024-2029 and its various branches of operation: Bushcare, Landcare, Bush Backyards, Catchment Groups, Bushcare Network and Trackcare.

The NAVP is a valuable environmental management and conservation program.

The Society endorses Rights of Nature (RON) as adopted by BMCC on 29 April 2021 but notes that acknowledgement of Rights of Nature is not documented in the draft NAVP 2024-2029.

The Society proposes these amendments (p.18):

Aims and Objectives

A further Aim of Council's Natural Area Volunteer Program is to respect the Rights of Nature, as adopted by BMCC 29th April 2021

Objectives of the NAVP

Raise community awareness about Rights of Nature

The Society believes that BMCC must ensure that funding of NAVP programs is adequate and enables fulfillment of the program's objectives. The Society believes that BMCC should ensure that NAVP funding is annually reviewed, in order to meet its objectives, and at the least, is increased in line with inflation.

The Society believes that Climate Change poses a major threat to the natural environment of the Blue Mountains and the Greater Blue Mountains World Heritage Area. This threat and the need to manage it should be acknowledged in the NAVP 2024-2029. The Society believes that catchment and bushcare groups contribute to mitigation of Climate Change and its impacts and that future expansion and funding of the NAVP 2024-2029 should take this contribution into account. For the Society's recommendations re Climate Change, see Specific Principles.

The Society believes that Climate Change associated stream degradation poses a major threat to the natural environment of the Blue Mountains and the Greater World Heritage Area. This threat should be acknowledged in the NAVP 2024-2029. For recommendations see Specific Principles.

2. Specific principles and provisions

2.1 Engagement with Indigenous communities and knowledge (pp.12-13)

The Society strongly endorses Indigenous community and knowledge engagement with the NAVP, as set out in the NAVP (pp.12-13). However, this engagement is not incorporated into the Objectives of the NAVP (p.18).

The Society proposes these amendments:

Objectives of the NAVP (p.18)

Promote and engage with Indigenous communities of the Blue Mountains and their cultural and ecological knowledge.

This objective should be formalised in the Action Plan (p.36).

Provide opportunities for BMCC Aboriginal Cultural and Development Officer and Indigenous communities and representatives to share cultural and Traditional Ecological Knowledge (TEK) with NAVP volunteers and the community.

2.2 Aims and Objectives (p.18)

The Society believes that improving stream health is an important NAVP objective and should be mentioned in the Objectives. This is consistent with BMCC Community Strategic Plan 2035.

The Society proposes this amendment (p.18):

Objectives of the NAVP...

Raise community awareness about environmental weeds and stream degradation, and the detrimental ecological impacts that arise from urban infrastructure.

The Society believes that Climate Change should be acknowledged in the Objectives.

The Society proposes these amendments (p.18):

Objectives of the NAVP...

Raise community awareness about the detrimental ecological impacts of Climate Change on bushland ecosystems.

6. Provide volunteers with the skills and knowledge to effectively maintain and manage bushland and assets in natural areas and mitigate the impacts of Climate Change.

The Society believes that environmental advocacy by NAVP volunteers should be endorsed in the NAVP, in line with similar documentation in the BMCC Bushcare Manual.

The Society proposes this amendment (p.18):

Objectives of the NAVP...

5. Support conservation volunteer groups to function on a regular basis and produce positive environmental outcomes and engage in constructive environmental advocacy.

2.3 Landscape-scale management approach (p.20)

The Society endorses the landscape-scale approach to natural area management, as set out in the draft NAVP.

However, the Society has identified a gap in the conservation landscapes mentioned in the NAVP. Faulconbridge to Lawson Transitional Hawkesbury-Narrabeen Sandstone Complex is omitted.

This is an important conservation landscape, containing a distinctive, significant vegetation community. Also, the dominant, urban settled ridge and associated transport corridor is at its narrowest point in Linden, raising concerns about weed transfer to stream systems and protected areas.

The Society proposes this amendment (p.20):

Insert *Faulconbridge to Lawson Transitional Hawkesbury-Narrabeen Sandstone Complex.*

2.4 Community Catchment Groups (p.20)

The Society commends the establishment of community catchment groups, as a contribution to landscape-scale natural area management.

However, the relationship between catchment groups and bushcare groups does not appear to be fully explicated and requires clarification.

For example, do catchment groups, being comprised of NAVP volunteers, formally represent bushcare and landcare groups? Do catchment groups determine bushcare and landcare group on-site actions and plans?

Discussion and principles: Bushcare groups are subject to the BMCC Bushcare Manual, and their on-site work is supervised by BMCC Bushcare Officers representing BMCC. BMCC asserts its right to make final decisions about land management. Membership of catchment groups by NAVP volunteers is optional. Membership of catchment groups is not necessarily representative of bushcare groups in the catchment. Catchment groups are self-governing and independent of Council, as stated, and apparently are not subject to the Bushcare Manual. Administratively, it would be completely inappropriate and quite possibly illegal for BMCC to delegate management authority for publicly funded bushcare and landcare groups to catchment groups that operate under a completely separate set of governance provisions and are independent of and operate externally to Council. BMCC should not be supporting (with rate-payers' funds) catchment groups that espouse environmental policies and governance provisions inconsistent with Council's NAVP and Bushcare Manual.

To provide clarity for NAVP volunteers, the Society proposes this amendment (p.20):

...[Catchment Groups] are initiated by NAVP volunteers working within a specific catchment or landscape area, to develop and promote shared landscape-scale ~~a shared vision for~~ environmental visions and outcomes, that are consistent with Council's Natural Area Volunteer Program and Bushcare Manual. They are self-governing and independent of Council. Catchment Groups do not represent, manage or make binding decisions on behalf of Bushcare and Landcare Groups.

2.5 Bushcare Network (p.21)

The Society commends Council's creation and support of the Bushcare Network, as a means of improving bushcare and conservation outcomes.

However, the Society believes that the relationship that exists between the Bushcare Network, on the one hand, and BMCC bushcare and landcare groups, on the other hand, is not clearly explicated, and requires clarification. The relationship is described as "includes". This is not precise.

For example, does the Bushcare Network formally represent bushcare and landcare groups? Does the Bushcare Network make binding policy and field work decisions on behalf of bushcare and landcare groups?

Discussion and principles: Bushcare groups are subject to the BMCC Bushcare Manual, and their on-site work is supervised by BMCC Bushcare Officers representing BMCC. BMCC

asserts its right to make final decisions about land management. Membership of the Bushcare Network by individual bushcarers and bushcare groups is optional and is not necessarily representative of bushcare and landcare groups. The Bushcare Network is self-governing and independent of Council, as stated, and apparently is not subject to the Bushcare Manual. Administratively, it would be completely inappropriate and quite possibly illegal for BMCC to delegate authority for the management of publicly funded bushcare and landcare groups to organisational bodies such as the Bushcare Network that operate under a separate set of governance provisions and are independent of and operate externally to Council. Council should not be supporting (with rate-payers' funds) a Bushcare Network organisation that espouses policies and governance provisions inconsistent with Council's NAVP and Bushcare Manual.

The Society proposes this amendment (p.21):

The Network has a membership beyond Council supported groups, extending to all groups and individuals who work to restore bushland in the Blue Mountains. The Bushcare Network is self-governing and independent of Council, although works closely with Council's Bushcare team to organise regular meetings to discuss issues of importance to Bushcare / Landcare groups and all groups and individuals who work to restore bushland in the Blue Mountains. Accordingly, the Bushcare Network does not formally represent, manage or make binding decisions on behalf of BMCC Bushcare and Landcare Groups. The vision and outcomes of the Bushcare Network should be consistent with the BMCC Natural Area Volunteer Program and Bushcare Manual.

2.6 Community Water Monitoring (p.21)

The Society endorses Council's engagement with community water monitoring. However, the Society notes that the current operations of the Community Water Monitoring program are not explicated in the draft NAVP: i.e. number of groups, number of participants, hours contributed, services rendered, details of the support that BMCC actually contributes. The Society recommends that these details be provided in the draft NAVP.

2.7 Relationship to other parts of Council (p.22)

The Society notes that the following provision applies to NAVP groups: *In the case of Council reserves, Council's Natural Area Management and Property Management Services, retain overall responsibility for all land management decisions.*

The Society endorses this statement and as already set out in this submission, maintains that Council's legal responsibility for land management infers that it cannot delegate this authority and responsibility to external, independent organisations, such as catchment groups and the Bushcare Network.

The Society suggests that the meaning of *reserves* should be further explained. Does *reserves* refer to all Council owned or managed land, or only to recreation reserves? The former definition would appear to be more comprehensive and is probably intended.

The Society proposes this amendment (p.22):

*In the case of Council **owned or managed land**, Council's Natural Area Management and Property Management Services retain overall responsibility for all land management decisions.*

2.8 Bushcare and Landcare (p.25)

- How We Do It (p.25)

As the draft NAVP document makes it clear that catchment groups and the Bushcare Network *are self-governing and independent of Council*, the Society recommends that the administrative status of bushcare and landcare groups is also fully explicated.

Bushcare groups conduct their work on land over which Council exercises management and legal responsibility (p.22). Bushcare groups are supervised by BMCC Bushcare Officers (p.26) and are subject to the BMCC Bushcare Manual.

The Society proposes this amendment (p.26):

How We Do It

The on-site work programs of Bushcare Groups are ultimately determined by BMCC Bushcare Officers, Council natural area and land managers and Council policies. The knowledge, skills and advice of Bushcare Group volunteers are highly valued and can inform development of on-site works and policy.

The Society notes that Landcare is conducted on private land, following consent by the landowners. Presumably, the administrative and support arrangements between Council and landcare groups is documented.

- Delivery model (p.26)

Part-time supervision.

Due to previous instances where bushcare groups/individuals have engaged in unskilled work (e.g. rampant clearing of vegetation, planting of non-local indigenous Australian species), the performance of groups receiving part-time supervision should be regularly reviewed.

The Society proposes this amendment (p.26):

*Part supervision: Bushcare Officer attends a minimum of four work sessions annually. This model is part of the flexible service delivery and is currently only applicable to a trial number of Bushcare/ Landcare groups **exhibiting suitable experience and training**. Council may **exercise its option to reinstate full supervision**.*

2.9 Trackcare (p.29)

The Society endorses full supervision of all trackcare activities and the non-offering of a part-supervision option, for the reasons mentioned in the NAVP.

2.10 Bush backyards (p.31)

The Society notes that *agreed property management plans* are in place for all involved properties and organisations and presumably these agreements cover all administrative scenarios.

2.11 Action Plan (p.36)

The Society commends the various educational initiatives outlined.

The Society believes specific mention should be made in the Action Plan of the need to provide education about Indigenous communities and their cultural (important places and items) and ecological heritage to NAVP volunteers, as is deemed appropriate i.e. respecting cultural sensitivities.

The Society proposes the following amendment (p.36):

Appropriate, culturally sensitive education about Indigenous communities and their Blue Mountains historical heritage, Traditional Ecological Knowledge (TEK) and cultural heritage is to be provided for NAVP volunteers.

It is important to note that bushcare groups are not autonomous and it is not proposed in the draft NAVP that any bushcare groups will operate autonomously i.e. independently, self-governing. The draft NAVP proposes that approved bushcare groups will have part-time supervision. The Society proposes the following two amendments (p.36):

Review existing Bushcare / Landcare groups that have requested ~~autonomous~~ part-time supervision.

...Bushcare / Landcare groups assessed for ~~autonomous~~ part-time supervision (flexible delivery model).

The performance of bushcare groups receiving part-time supervision should be regularly reviewed.

The Society proposes this amendment (p.36):

Flexible delivery model implemented for authorised groups in trial program. Group performance to be regularly reviewed by Bushcare Officer and reinstatement of increased or full-time supervision to be implemented if necessary.

The Society will be pleased to answer any enquiries concerning its draft NAVP submission and assist with further development of the draft NAVP 2024-2029. If you have any questions in regard to this letter, please contact me on email president@bluemountains.org.au .

Thank you for providing the opportunity to comment.



Mrs Annette Cam

President
Blue Mountains Conservation Society