

Enquiries: Kim Wilson
Our Ref: 0161_2017_1204
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14/11/2017

Ecological Communities Section
Department of the Environment
GPO Box 787
Canberra ACT 2601

Attention: Trudy O'Connor

Dear Trudy

Submission on proposed listing of "Tuart (*Eucalyptus gomphocephala*) woodlands and forests of the Swan Coastal Plain" as a critically endangered threatened ecological community under the EPBC Act

Thank you for the opportunity to provide a submission on this important assessment.

The Peel-Harvey Catchment Council (PHCC) is an incorporated, not-for-profit, community based Natural Resource Management organisation that promotes an integrated approach to the management of our natural resources. The PHCC is also the NRM regional body responsible for the Peel-Harvey Natural Resource Management (NRM) Region.

The PHCC values the opportunities provided through the EPBC Act to protect and better manage the rare and threatened species and ecological communities of the Peel-Harvey Catchment. The following comments are provided within the context of our mission statement: 'as environmental stewards we will encourage and enable effective catchment management to create a healthier natural environment in the Peel-Harvey by building community education and capacity, influencing and leading critical thought and environmental pride, and exemplifying and implementing best practice'.

The PHCC believes the *Tuart (Eucalyptus gomphocephala) woodlands and forests of the Swan Coastal Plain* ecological community merits listing as 'critically endangered'. We also suggest that the assessment levels for Criterion 1 and 3 could be increased from 'endangered' to 'critically endangered', thus providing greater justification for this level of classification. It is pertinent to note that the Tuart community occurs in one of the world's Biodiversity Hotspots, recognised as such due to the high level of endemism and high level of threats.

Notwithstanding our additional comments in Attachment 1 the PHCC is generally supportive of the draft Conservation Advice, it provides sufficient detail to understand and act. However, we suggest the Conservation Objective be reworded to strengthen it to, "To eliminate the risk of extinction of the Tuart (*Eucalyptus gomphocephala*) woodlands and forests ecological community..."

Tuart Woodlands are a characteristic feature of the coastal and near-coastal portion of the Peel-Harvey catchment and have declined significantly in extent and condition since European settlement.

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*We acknowledge the Noongar people as Traditional Custodians
of this land and pay our respects to all Elders past and present*

Over recent decades they have been, and continue to be, impacted by severe decline and bushfire, cleared for urban development, horticulture and extractive industries and affected by other threats such as weed invasion.

PHCC over the past two decades has worked with our community and agency partners to protect and enhance our tuart woodland communities. This has included implementing a number of consecutive on-ground restoration projects, through various sources of funding, to restore Tuart Woodlands impacted by the extensive decline of last decade and other historical disturbances. These projects have addressed a range of threats and threatening processes which will continue to reduce the condition of the Woodlands if not actively managed. Through working with our community and other partners such as Murdoch University, we have come to appreciate how difficult it can be to restore Tuart Woodlands. Protection and management of remnants is clearly a better option.

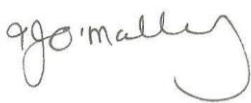
Other efforts to improve their protection include actions such as involvement in the Tuart Response Group and the review of the Lake Clifton Herron Structure Plan and more recently engagement in the decision-making processes for the Strategic Assessment of the Perth and Peel regions.

As re-establishment of the Tuart community is often an expensive exercise, preventing degradation is a far more efficient and effective management approach. The listing of the Tuart Woodlands as a TEC will provide strong support to prevent further degradation and loss of the community and its intrinsic values and valuable ecosystem service functions which cannot easily be replaced. These values include providing habitat for a suite of native mammals and birds that are under threat on the coastal plain including the EPBC Act listed *endangered* Carnaby's Cockatoo and the *vulnerable* Western Ringtail Possum along with a great diversity of unique species of flora.

I reiterate PHCC's support for the listing of the "Tuart (*Eucalyptus gomphocephala*) woodlands and forests of the Swan Coastal Plain" as a critically endangered threatened ecological community under the EPBC Act. Please refer to Attachment 1 which provides further detail in regard to this submission.

Should you require further information, please do not hesitate to contact Kim Wilson on (08) 6369 8800 or email admin@peel-harvey.org.au.

Yours sincerely



Jane O'Malley
Chief Executive Officer

Encl:

*Attachment 1 – PHCC detailed response: Submission on proposed listing of “Tuart (*Eucalyptus gomphocephala*) woodlands and forests of the Swan Coastal Plain” as a critically endangered threatened ecological community under the EPBC Act*
Attachment 2 - Dead_Dangerous WANDRA Activated event AGRN694 Bushfires Peel South West Observation Report
Attachment 3 - FINAL WANDRA AGRN694 Yarloop Bushfires rv 2017-09-12
Attachment 4 – R.E. & C. Johnstone and T. Kirkby TargetedThreatenedFaunaSurvey_2006_for distribution
Attachment 5 - R. Johnstone and T. Kirkby Black Cockatoo Research Project Progress Report 2016 DOH - PUBLIC version
Attachment 6 – Att6_SoHExtractive Industry_Tuart Forest_May 2017
Attachment 7 - Excerpt from: 2001 COMMUNITY CONSERVATION GRANTS Assisting Tuart Reafforestation in Lake Clifton
Attachment 8 - Tuart Conservation & Protection Report 2002