

9<sup>th</sup> August 2023

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The Director  
Ecological Communities Section  
Protected Species and Ecological Communities Branch  
Department of Climate Change, Energy, the Environment and Water  
PO Box 3090  
Canberra ACT 2601

Dear Director,

**RE: ‘Honeymyrtle shrubland on limestone ridges of the Swan Coastal Plain Bioregion’  
threatened ecological community.  
Draft Conservation Advice**

### **Proposed conservation status**

The Urban Bushland Council WA Inc. (UBC) submits that this ecological community is eligible for listing as *critically endangered* under the *EPBC Act*.

Indeed, this listing is strongly supported, and as stated, its listing is consistent with the listing of '*Melaleuca huegelii* – *M. systema* shrublands of limestone ridges (Floristic Community Type 26a as originally described in Gibson *et al.* 1994)' under the *WA Biodiversity Conservation Act 2016* as critically endangered.

The UBC is the peak WA community organisation for urban bushland recognition and protection. UBC is an incorporated, not for profit organisation registered as a charity.

<https://www.bushlandperth.org.au/>. We are a voluntary community association with an active membership of **88 volunteer groups** (each with their own local membership from 10-165 individuals) and an additional 100 individual ‘supporter’ members – all with a common interest in conservation and protection of areas of urban bushland in WA. UBC advocates to all levels of Government for natural areas protection. We do this with limited resources through the amazing efforts of our ‘Friends Groups’ and their many volunteers – from all walks of life ‘working’ to improve and maintain the health of patches of neighbourhood nature.

### **Draft conservation advice**

The UBC makes the following comments on the draft Conservation Advice, and comments on some of the questions asked.

## **1. Ecological community name and description**

### **1.1 Name**

The name is appropriate although it could have a sub-heading added: **Honeymyrtle shrubland on limestone ridges of the Swan Coastal Plain Bioregion** – *Melaleuca huegelii* – *Melaleuca systema* shrublands of limestone ridges.

This would help people who are familiar with the WA listed Floristic Community Type (FCT) 26a know that it is the same ecological community.

## **1.2 Description of the ecological community and the area it inhabits**

This is supported.

### *1.2.3 Key ecological processes*

We do not agree that long periods of fire exclusion are likely to be detrimental to the ecological community.

We agree that frequent burns, and post-fire grazing (e.g. by rabbits) will be, and already are, detrimental to the ecological community.

## **2.1 Key diagnostic characteristics**

These are sufficient as described.

## **2.2 Additional information to assist in identifying the ecological community**

### *2.2.1 Identifying a patch*

Good points made.

#### *2.2.1.1 BREAKS IN A PATCH*

This is well described and is supported.

#### *2.2.1.2 VARIATION WITHIN A PATCH*

This is well described and is supported.

#### *2.2.1.3 BUFFER ZONE*

The buffer zone should explicitly include FCT 26b as it is part of the whole community as FCT 26a and FCT 26b co-occur. Thus, addition of FCT 26b into the buffer zone is essential for ecological functioning. With this addition, the recommended buffer zones are strongly supported and should be legally required and legally enforced under the *EPBC Act*.

The required buffer zone of at least 200m should be formally protected as a Matter of National Environmental Significance (MNES).

#### *2.2.1.4 REVEGETATION AND REGROWTH*

This is an important issue and is supported.

### *2.2.2 Survey requirements*

This is a very important section and is supported.

### *2.2.3 Mapping and vegetation classifications*

Well described and supported.

### *2.2.4 Intergrading and closely allied vegetation communities.*

It is recommended that FCT 26b be added to the buffer zone as it is a closely allied community as explained above.

### *2.2.5 Relevant listed ecological communities*

Well described and supported.

Manning Ridge is in very good to good condition and should be included.

The mapping is very good.

## **2.3 Condition classes and thresholds**

This section is important and is strongly supported.

Quote: *'Because less than 200 ha of the ecological community remains, all areas of the ecological community are critical to the survival of the ecological community, regardless of their condition, and are to be protected as MNES as stated.*

It is important that they are legally protected and that this is legally enforced under the EPBC Act.

## 2.4 Habitat critical to the survival of the ecological community

This section is strongly supported as stated.

We certainly agree that all patches are critical to the survival of the ecological community, including a 200 m native vegetation buffer as described in 2.2.1.3.

## 2.5 Surrounding environment and landscape context considerations when protecting, managing and restoring the ecological community

Well described and is supported.

## 3 Cultural and community significance

Supported. We do not have additional information.

## 4 Threats

Well described and supported.

Fire is a significant threat, and management capacity and management action is needed to **avoid** fire **and to quickly detect and quickly extinguish any fire.**

Prescribed burning is a threat.

### 4.1 Threat table - Table 3 on pages 21 – 25 incl.

The threat factors are well listed.

We agree that the threat of fire is extreme.

We are also aware that fire is a key Threatening Process (KTP) under the *EPBC Act*.

Under the threat factor of 'Fire regimes that cause decline in biodiversity' (on page 23), we do not agree that long periods of fire exclusion is detrimental to the ecological community. After fire, weed invasion increases and results in increased fire risk.

Indeed, long unburnt areas have the lowest fire risk, especially on the Swan Coastal Plain.

Prescribed burning should not be conducted in this vegetation complex as it results in increased grassy weed invasion and thus increased fire risk, and thus is also a greater risk to wildlife and kills large numbers of native fauna, especially reptiles, invertebrates.

Invasive plant species: the data quoted is from 1994 (nearly 30 years ago) and the weed and native plant surveys need to be updated to provide current data.

Also the threat status is likely to be higher than minor.

It is likely to be major.

Other disturbance due to urbanisation: this threat as described is higher than minor, especially with so few patches of the ecological community remaining.

This threat level should be at least major.

#### 4.1.1 Key threatening processes (KTP)

Pet cats and domestic cats should be added to the KTP 'Predation by feral cats' to:

'Predation by feral, pet and domestic cats' or alternatively change the wording to 'Predation by cats'.

## 5 Conservation of the ecological community

### 5.1 Primary conservation objective

Strongly supported.

The following statement in this section is very important: 'This includes retaining and

*protecting all remaining patches and natural buffer zones from key identified threats and restoring them to higher condition classes.*’ It therefore requires that there be no clearing or incursions permitted. This must be legally enforced under the *EPBC Act*.

This also means that offsets to justify clearing cannot be used or allowed by any level of government.

## **5.2 Existing protection and management plans**

### **5.2.1 Existing protections**

This shows that there is a gap in protection of the ecological community at the WA State level – as a Clearing Permit can be issued. Thus it is imperative that no clearing will be permitted be explicit under the *EPBC Act*. This must be legally enforced.

The information given shows the existing management plans are not adequate and need to be updated for the State FCT 26a, and for the *EPBC Act* listing.

## **5.3 Principles and standards for conservation**

This is very important information which explains why **retention of all remaining areas of the TEC** is essential and must be legally required and enforced under the *EPBC Act*.

Offsets must not be allowed to justify clearing or incursions as it is contrary to retention of all remaining areas.

The priority conservation actions (on page 29) under the first dot point should be amended to: PROTECT the ecological community to prevent further loss of extent and condition;

## **5.4 Priority conservation and research actions**

### **5.4.1 PROTECT the ecological community**

This is essential and must be legally enforced under the *EPBC Act* and must apply to **all landholders and land managers of the ecological community**.

#### **5.4.1.2 CONSERVE REMAINING PATCHES**

All points made in this section are critically important and are strongly supported. They must be made legally binding and be **enforced at all levels of government**.

#### **5.4.1.3 MANAGE ACTIONS TO MINIMISE IMPACTS**

This section is well worded and is strongly supported.

Avoiding impacts and the statement that **‘offsetting is not suitable for this ecological community’** is of paramount importance and must be made legally binding.

#### **5.4.1.4 APPLY BUFFER ZONES**

This section is strongly supported and must be legally enforced.

#### **5.4.1.5 PREVENT THE INTRODUCTION AND SPREAD OF EXOTIC SPECIES AND DISEASES**

These comprehensive actions are well explained and are strongly supported.

### **5.4.2 RESTORE and MANAGE the ecological community**

Supported.

#### **5.4.2.1 FIRE MANAGEMENT**

It is recommended that this section be revised.

Fire is a listed Key Threatening Process (KTP).

Too frequent fire is a major threat to this community – it has been burnt far too often as described on page 39.

A change is recommended to have no prescribed fires (called prescribed burns in WA), rather than ‘limit the use of prescribed fires ....’ This could be re-stated as ‘**avoid all prescribed fires in the ecological community and in its buffer zone**’.

Fires **do not support the habitat and do promote the invasion** of exotic species as well as killing native invertebrates and reptiles.

Avoiding the use of fire retardants is strongly supported.

#### **5.4.3 COMMUNICATE, engage with and support**

This section (on pages 32 – 34) is well explained and is supported.

#### **5.4.4 RESEARCH AND MONITORING**

There is too much focus on fire research.

Patches of this community should not be burnt at all.

The second and third dot points which concern fire should be deleted.

The last dot point should be put first on the list: ‘*Actively promote research and development in restoration science and technology to enable communities to protect and restore the biota of the ecological community.*’ This covers all the necessary research and monitoring.

Restoration research is much needed.

A key example of this is for Manning Ridge.

##### **5.4.4.1 MAPPING**

The mapping and monitoring with field surveys as stated is much needed and is strongly supported.

This will provide essential data for effective management and protection.

##### **5.4.4.2 OPTIONS FOR MANAGEMENT**

The second dot point to support management in the role of fire is not supported and should be deleted.

The sixth and seventh dot points concerning fire regimes should also be deleted.

Notably there is an excessive focus on fire and prescribed burning by the WA Department of Biodiversity, Conservation and Attractions (DBCA), and this is not supported by many scientists and community organisations which care for bushland areas in the south west of WA.

As a management option, the northern Ridges need to be added to Yanchep National Park as was described in the Management Plan for Yanchep National Park in 2010.

Indeed, this was first recommended 40 years ago in the System 6 Plan. These ridges have been known to be significant for a long time (G. J Keighery *pers. comm.* 2023)

##### **5.4.4.3 MONITORING**

This monitoring is much needed and supported.

#### **Recovery Plan**

A Recovery Plan using updated data and clear conservation actions as described is much needed and should be an added priority.

## **6 Listing Assessment (pages 37 – 45)**

**The listing as per this section under criterion 2 as *Critically Endangered* is strongly supported.**

## **CONCLUSION**

The ecological community faces ongoing threats from clearing, fire regimes that cause biodiversity decline, climate change, recreational use and introduced species. It is very susceptible to the

cumulative impact of these threats because of the very restricted area of occupancy and almost all occurrences are small in size.

Therefore, the ecological community has a **very restricted** geographic distribution, and the nature of this distribution makes it likely that the action of a threatening process could cause it to be lost in the **immediate future** (within 3 generations of the predominant shrubby layer species of the ecological community, estimated to be 45–90 years). The Committee's preliminary assessment is that the ecological community may meet the relevant elements of Criterion 2 to make it eligible for listing as **Critically Endangered.**”

The ecological community is also eligible under criterion 1 and under criterion 4 for listing as vulnerable.

There is insufficient data available for listing under criteria 3, 5 and 6.

We do not have any additional information to help assess the criteria.

The UBC hopes the above comments on the Draft Conservation Advice are helpful.

We may be contacted directly to clarify any comments - by email to [ubc@bushlandperth.org.au](mailto:ubc@bushlandperth.org.au) and to me directly at [christine.richardson@bushlandperth.org.au](mailto:christine.richardson@bushlandperth.org.au) or by phone direct to me at 0427 777 135.

Sadly, due to limited distribution and threats, we look forward to the listing of the ‘Honeymyrtle shrublands on limestone ridges of the Swan Coastal Plain Bioregion’ as Critically Endangered under the *EPBC Act* so that they can be better protected and managed for conservation.

Yours sincerely

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Chairperson  
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